

Dear Declan Cleary

SMD/2024/0019

Development of a Battery Energy Storage System (BESS) with ancillary infrastructure, security fence, access, landscaping and biodiversity enhancements, to provide balancing services to the local electricity grid.

Land at, Newfields Farm, Rownall Road, Wetley Rocks, Staffordshire, ST9 0BS

Staffordshire Wildlife Trust has been asked to review the above application as part of a service level agreement with Staffordshire Moorlands District Council to provide ecology advice regarding planning and development management functions.

We have viewed the following documents:

- Planning, Design and Access Statement, Pegasus Group, January 2024
- Preliminary Ecological Appraisal, Phlorum, December 2021
- Ecology Walkover and Assessment Note, Enzygo, 4th January 2024
- Strategic Landscape Planting Plan ref: P23-0415_EN_0007_D_0001 (13/12/23)
- Arboricultural Impact Assessment (AIA), Greenwood Surveys, January 2024

SUMMARY –Staffordshire Wildlife Trust, having reviewed the information provided, has a **HOLDING OBJECTION** – further information required in relation to the following:

1. BNG Assessment Report and BNG Metric
2. Bat survey of tree requiring arboricultural works

Secure via condition should approval be granted:

1. Precautionary method statements for protected species during construction
2. Sensitive lighting scheme to minimise disturbance to wildlife
3. Minimum 20m buffer zone adjacent to watercourse
4. Landscaping and habitat enhancement details e.g. seeding, planting, soil preparation
5. Landscape and Habitat Management Plan to ensure habitats are managed appropriately for biodiversity
6. Details/specification for species enhancement measures i.e. bird and bat boxes

BIODIVERSITY NET GAIN

We have reviewed the Planning, Design and Access Statement, Pegasus Group, January 2024 and note that a BNG assessment has been completed. We require a copy of the BNG Assessment report and the supporting metric to be able to review and provide comment on this.

BAT SURVEY

We note that arboricultural works (crown lifting) are required for a Category A beech tree (T63) as stated in the AIA report (Greenwood Surveys, January 2024). Figure 5 in the AIA report is a photograph of this tree which indicates that it is of sufficient size and age to have potential for roosting bats. A Ground Level Tree Assessment (GLTA) is required in the first instance to identify if the tree has bat roost potential with recommendations for further surveys and mitigation as required to avoid risk of harm to bats. We note that all other trees are to be retained which is welcomed.

PRECAUTIONARY WORKING METHOD STATEMENT FOR PROTECTED SPECIES

We have reviewed the PEA report (Phlorum 2021) and the Ecology Walkover and Assessment Note (Enzygo, January 2024) and note that the site has potential to support great crested newts, bats, nesting birds, hedgehog, brown hare and badger and agree that the risk of disturbance or harm to these species is low and can be adequately managed via a suitable Precautionary Working Method Statement (PWMS). The requirement for a PWMS can be secured by planning condition.

SENSITIVE LIGHTING SCHEME

We recommend that a sensitive lighting scheme is provided, as detailed in the Ecology Walkover and Assessment Note (Enzygo, January 2024). This should include details of the location, design and lux levels of lighting to be used during the construction and operational phase of development, to minimise disturbance to retained habitats and associated wildlife, in particular foraging bats. The lighting scheme can be secured by planning condition.

WATERCOURSE BUFFER ZONE

We note and welcome the intention to retain a minimum 20m wide undeveloped buffer zone between the development and watercourse corridor to the west of the site. We recommend that the requirement for an undeveloped buffer zone is secured by planning condition and for the avoidance of doubt the condition should state that the buffer zone is to be measured from the top of the bank of the watercourse.

LANDSCAPE AND HABITAT ENHANCEMENT AND MANAGEMENT

We note that the proposed development includes a strategic planting plan (drawing ref: P23-0415_EN_0007_D_0001) with native broadleaved woodland, scrub and native hedgerow planting. We note that the existing pasture is to be enhanced with meadow seeding using the Emorsgate 'Standard General Purpose Meadow Mixture' (or similar). The habitat creation proposals are welcomed and we recommend that the detail of the proposed planting scheme including all planting mixes, seed mixtures, soil preparation and methods of establishment is secured via planning condition.

We recommend that a Landscape and Habitat Management Plan (LHMP) is prepared to detail how the proposed habitats will be managed in the long term. The requirement for a LHMP can be secured via planning condition. The LHMP should include details of how the ecological value of the site will be maintained and managed after decommissioning which we note will take place after 40 years. In particular, the LHMP should include details of the habitats that will be established and managed within the footprint of the decommissioned works.

BIRD AND BAT BOXES

We note and welcome the recommendation in the PEA report (Phlorum 2021) to provide bird and bat boxes and suggest that a plan showing the number, location and specification of bird and bat boxes to be installed is secured by planning condition.

Regards,

Dated 27 June 2024