

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.

These comments have been revised to take account of the Statutory BNG Metric calculator tool supplied on 27 June 2024.

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
- BNG metric calculator tool dated 4th January 2024

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

1. Bat survey of tree requiring arboricultural works

Secure via condition should approval be granted:

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

BIODIVERSITY NET GAIN

We have reviewed the BNG metric calculator tool which was completed on 4th January 2024. Although the Statutory version of the metric has been used, the planning application was submitted and validated in January 2024, prior to the formal introduction of the Statutory metric on 12th February. Therefore, the development is not captured by the requirements of the Statutory metric in this case.

We are generally in agreement with the baseline and post-development habitat types and condition that have been used to populate the metric and welcome the use of appropriate native species throughout the planting scheme.

There appear to be some minor inconsistencies between the details in the metric and the proposed strategic planting plan (drawing ref: P23-0415_EN_0007_D_0001) in respect of the proposed grass seeding of the earth bund. Grassland creation on the earth bund is described in the BNG metric as re-seeding of the new bund but is shown in the strategic planting plan as overseeding of existing grassland.

There also appears to be an inconsistency in the extent of proposed grass seeding between the BNG metric (0.73ha created/enhanced) and the strategy planting plan (5750m²). However, it is unlikely that these apparent discrepancies will have a significant impact on the overall BNG score which demonstrates a significant net gain.

We note that the attainment of the stated target habitat condition is reliant on appropriate long-term management. We therefore recommend that a Landscape Habitat Management Plan is requested and secured by planning condition. Further details are provided below.

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 and to ensure that the development is able to achieve the stated BNG habitat condition.

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