

Dear Sir/Madam

SMD/2024/0055

**Erection of a Flexible Energy Facility, associated works, landscaping and habitat creation
Land South of Cellarhead Substation and West of Rownall Road, Wetley Rocks, Staffordshire
22.40 ha**

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.

An application (Full Planning - Large scale MAJOR) is being sought for the construction of a Battery Energy Storage System (BESS) facility incorporating a substation and emergency and perimeter roads on land to the south of Cellarhead Substation and west of Rownall Road, near Wetley Rocks. The site is located within the Staffordshire Moorlands Green Belt.

We have viewed the following documents:

- Site plan Rev. A (Avon, dated 18/10/23)
- Site layout plan Rev. C (Avon, dated 22/12/23)
- Preliminary Ecological Appraisal (Weddles, dated 31/01/24)
- BNG Biodiversity Impact Assessment (Weddles, dated 24/01/24)
- Tree Protection Plan DWG 1629-003 (Weddles, dated Nov. 23)

SUMMARY – Having reviewed the information provided we have a **holding objection** – further information required:

1. Detailed protected species surveys and assessments should be undertaken at the appropriate time of year and conforming to published guidance, to include great crested newt (GCN), breeding birds, wintering birds and water voles and/or details of an alternative suitable approach (such as District Licensing Scheme for GCN, where feasible and appropriate).
2. Clarification is requested on which trees were closely inspected using ladders and which were subject only ground level assessment with binoculars, with a plan to show location and classification of all trees assessed with categories to follow Collins 2023. In addition, those trees to be directly or indirectly impacted should be clearly identified (cross-referenced to the Arboriculture Survey).
3. The proposed scheme removes numerous sections of hedgerow and several trees. The potential impact of this should be more fully addressed with regards to potential impacts on local bat populations.
4. Cumulative impacts should be assessed and reported.
5. In the light of the above, the impact assessment should be updated to include the potential impacts on protected species and habitats and follow the Ecological Impact Assessment (EclA) guidance of CIEEM 2018 (updated April 2022).
6. Review and update the BNG assessment in the light of the presence of any European Protected Species (EPS) on the site once surveys completed (as this may impact upon the outcome of the BNG assessment).

7. A full copy of the completed Statutory Metric is required, ideally as the original Excel spreadsheet (only the Headline results are presented in the report).

A number of items are also recommended to be included as suitable worded planning conditions, should consent be granted.

ECOLOGY SURVEY

An ecology assessment is provided, which recommends detailed protected species surveys for great crested newts, wintering birds, breeding birds and water vole. We welcome this recommendation and advise that such surveys should be completed prior to determination of the application as protected species are a material consideration within NPPF.

Ground Level Tree Assessments (GLTA) only provide an estimate of bat roost value and additional close inspection may need to be undertaken to confirm roost potential of PRF trees (see Collins 2023, Figure 6.1). Clarification is requested on how trees were classified under the None, FAR, PRF classification scheme given in the methodology. In addition, it is not clear which trees were closely inspected using ladders (an approach noted in the methodology) and which trees may have some constraints on their GLTA approach (which may require further inspections). NB – under Collins 2023 there is no 'Negligible' or 'Low' categories for trees.

An assessment identifying those trees to be directly impacted, indirectly impacted and unimpacted/protected by the scheme both during construction and operational phases should be completed.

Losses of grassland, trees and hedgerow may have a significant impact on local bat populations. This should be evaluated further and supported by more detailed baseline surveys to understand the way in which local bat populations currently use the site.

Cumulative impacts of other projects in the vicinity of this scheme on ecology and biodiversity have not been assessed and this analysis should be completed.

We welcome the inclusion of an Ecologically Sensitive Lighting Plan and recommend that this is reviewed by a suitably experienced ecologist as part of any condition applied. If, following additional data collection, lighting may have a significant impact on bats (including in combination with other projects) there may be a need to request a draft lighting plan at the application stage.

We welcome the recommendation for reasonable avoidance method statements (RAMS) to be developed for the construction phase of the scheme, alongside a Construction Environmental Management Plan (CEMP). Alongside the protected species mentioned in the ecology report, the RAMS should include measures for badgers (including a pre-commencement survey), brown hare, common toad and other species as required following the additional detailed surveys undertaken (birds, bats, GCN and water vole). Measures to protect all retained habitats should be included in the CEMP. An approach for the control and eradication of Himalayan balsam should be included in the CEMP.

BIODIVERSITY NET GAIN (BNG) ASSESSMENT

We have assumed the Statutory Metric within the BNG Assessment report supersedes the Metric V4.0 presented in the ecology report.

Individual Tree Condition Assessment data should be presented (this is not available within the ecology report).

The line of tree reported in the ecology survey has not been noted in the BNG and it is unclear if this feature should be included in the baseline.

As a minor point - there is a slight mismatch between the condition assessment pass/fail categories for hedgerows H8 and H10 and ditches D1 and D2 between the ecology report data and the summary presented in the BNG report. This should be checked and amended in case it affects the BNG outcome.

The BNG report only provides a 'screenshot' of the Headline Results tab of the Metric. To enable a full evaluation the complete Statutory Metric document should be supplied with the report (ideally as the original completed Excel spreadsheet).

The management of the proposed landscape features to achieve the target uplift in Condition (which affects the number of units achieved) identifies some options that may not be feasible of the site, such as 'mob stocking' with sheep to maintain short swards, tree removal to reduce shading over the ditches and using nutrient poor soils to create and maintain a diverse grassland sward (soil testing may be required). The recommended habitat establishment and management actions should be expanded on to give confidence that the target condition of the habitats can be achieved and maintained.

The BNG Assessment report should take account of the updates to the proposed landscaping plan that result from the presence of any EPS (as this can impact upon the BNG outcome), once additional protected species surveys are completed and mitigation/compensation measures are identified.

We look forward to receiving the additional information and results of the further surveys in due course.

We may wish to make further comments on this application in due course, upon review of the additional requested information.

Regards,

Dated 01 October 2024