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19<sup>th</sup> October 2024

FAO: Mr David Cadman  
Staffordshire Wildlife Trust,  
The Wolseley Centre,  
Stafford,  
ST17 0WT

**RE: Weddles response to Staffordshire Wildlife Trust holding objection to planning application at Cellarhead Substation and West of Rownall Road, near Wetley Rocks, Staffordshire (SMD/2024/0055)**

Dear Mr David Cadman,

Thank you for your comments in relation to the application at Cellarhead Substation and West of Rownall Road, near Wetley Rocks, Staffordshire for the erection of a flexible energy facility, associated works, landscaping and habitat creation (SMD/2024/0055).

In the intervening period between the comments made 1<sup>st</sup> October 2024 and the date of issue of this letter 20<sup>th</sup> October 2024, Weddles have produced an Ecological Impact Assessment Report (EclA), written and prepared in accordance with the Guidelines for Ecological Impact Assessment in the UK and Ireland, CIEEM (2018). Revisions have also been made to a previously submitted Biodiversity Net Gain (BNG) Report.

This note provides a response to the Staffordshire Wildlife Trusts comments, with the majority of points raised now resolved by the relevant section within the EclA, which have been signposted

We consider that all potential material constraints have been addressed, and that appropriate and adequate avoidance, mitigation, and compensation measures are detailed allowing for the approval of the associated planning application from an ecological perspective.

The text overleaf (in black) are comments made by Mr David Cadman within the issued comment, with response made by Mr John Harvey of Weddles (in red), the lead author of the EclA and other submitted ecological documents (Preliminary Ecological Appraisal (PEA) and Biodiversity Impact Assessment (BIA)).

I hope that you find this useful in any further consultation.

Yours Sincerely,



John Harvey MA (Hons.) ACIEEM.

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).
  - a) An EclA now supports the application, and details the surveys undertaken for each of the above identified ecological constraints, detailing appropriate avoidance, mitigation, compensation and enhancements as required..
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).
  - b) All trees within and adjacent to the application site were subject to a Ground Level Tree Assessment (GLTA) to determine the suitability to hold roosting bats, in line with survey guidance found within the Bat Conservation Trust Guidance 4<sup>th</sup> Edition (2023) using the updated evaluation methods found within Table 6.2 (i.e no suitability, PRF-I and PRF-M) and appropriate actions (i.e FAR and PRF).

None of the recorded PRFs identified within trees were accessible by a ladder and therefore this survey method was not deployed. However, it is stated within section 4.5.3 of the submitted PEA report:

*“The trees are understood to remain unaffected by the development proposals with an adequate buffer between the trees and the development footprint. On the basis that the roosting resource for bats is to be retained, this ecological receptor is not a constraint to the development and is not considered further in this report.”*

It has now been confirmed that no trees will be impacted and as such, it was determined that close inspection surveys were not considered to be required. However, the EclA document does expand on this and provides an additional protection method to cover inadvertent indirect / short term impacts (dust kick

up, noise, light) which may possibly occur during the construction phase, as detailed within section 4.3.3.1. Mitigation measures are provided within section 5.1.5.2 relating to a 10m buffer from the trees displaying PRF-I for the duration of the construction phase and supplementary bat box provisions as enhancements result in a residual effect of 'Positive' to roosting bats.

The location of the trees is shown within the UKhabs Map found within Appendix E of the previously submitted PEA Report and Appendix B of the EclA Report (Trees with PRF-I are indicated in yellow).

To locate and identify the trees, cross reference this with the submitted Tree Protection Plan (DWG 1629-003 (Weddles, November 2023)).

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.

- c) It has been acknowledged that several stretches of hedgerow removal will take place to allow for the footprint of the development compound. The site was assessed as supporting 'Low' suitability for foraging and commuting bats on the basis that the hedgerows, although extensive, were themselves low quality, within a very low-quality environment (arable crops with few woodland edges and few potential roosting opportunities present within immediate surroundings).

On the basis that, appropriate mitigation and habitat enhancement has been designed into the submitted Landscape scheme (Landscape Mitigation Plan, Stephenson Halliday, January 2024), it was considered to be disproportionate to undertake full bat activity surveys. Further information supporting this is provided within sections 5.1.6.2 of the submitted EclA.

4. Cumulative impacts should be assessed and reported.

- d) Please refer to "1629 – Cellarhead BESS – Ecology EIA Screening Note and Cumulative Assessment, Weddles July 2024" Provided within Appendix A of this letter, which has been prepared and issued to the LPA, which assesses the cumulative impacts arising from this planning proposal and other, associated developments (i.e SMD/2022/0444, SMD/2022/0548, SMD/2023/0523 and SMD/2024/0019), concluding that all standard planning conditions arising will ensure that all schemes are designed to work within their existing green infrastructure and there is no perceivable habitat fragmentation, in the long-term.

It is determined that the impacts arising from the proposed development (SMD/2024/0055) are not additive (i.e not greater than the sum of their parts). The submitted BIA (showing a +126.41% gain) demonstrates the quantifiable improvement of habitats for the site and its immediate surroundings.

Further information is provided within section 5.2 of the submitted EclA.

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).
- e) The EclA, shows that no negative, or significant, residual impacts will arise from the development proposals, and that some positive effects are anticipated for Hedgerows, roosting bats, foraging and commuting bats, breeding birds and wintering birds.
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).
- f) No European Protected Species were recorded within the application site or respective zones of influence. A Great Crested Newt (GCN) District Level Licence Enquiry was made on 18<sup>th</sup> October 2024 to adequately compensate for any impacts on GCN. eDNA Surveys were also undertaken on ponds where access was possible, which resulted in a 'Negative' finding. As such, the BNG scores have not been altered.

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).

g) An amended BIA (see points below) and BNG Metric provided in .xls format.

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. **See comment (e).**

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. **See comment (b).**

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. **See comment (c).**

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. **See comment (d).**

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 have recommended that a Soft-lighting plan is submitted and secured as an appropriately worded planning condition, as found within section 5.1.6 of the EclA.**

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. **To confirm, the Statutory version has been used for this application.**

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. **Individual tree condition assessments are provided within Section 4.2.8 of the EclA.**

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. **These have been checked and confirmed as a typo and now amended within the revised BNG report. No fault was found for the condition assessments on the ditches, this comment may have arisen as the numbering within Table 13 of the PEA missed out a condition assessment criteria.**

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). **A excel version of the statutory metric is provided.**

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. **All details relating to the delivery of achieving habitat types and associated target conditions will be included within a Biodiversity Gain Plan as part of the Biodiversity Gain Condition. This will include a Habitat Monitoring and Maintenance Plan (HMMP) for onsite habitats, which will detail the responsibilities and legal obligation on implementing, monitoring and maintaining all habitats. We consider that the detail provided within the revised BIA provides the necessary information at this stage to inform a planning decision. If**

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. **No EPS were identified and therefore no further action was needed.**

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

**APPENDIX A** - 1629 – Cellarhead BESS – Ecology EIA Screening Note and Cumulative Assessment, Weddles  
July 2024

## CELLARHEAD BESS

### ECOLOGY EIA SCREENING NOTE AND CUMULATIVE ASSESSMENT

31<sup>st</sup> July 2024

Weddles is currently engaged as the project Ecologist for the proposed development of a Battery Energy Storage System (BESS) at Land South Of Cellarhead Substation And West Of Rownall Road, Wetley Rocks, Staffordshire, Planning reference SMD/2024/0055.

We have been asked to prepare a response to the ecological aspects of Staffordshire Moorlands District Council's EIA Screening Opinion dated 6<sup>th</sup> June 2024, which states:

*"In terms of ecology and biodiversity effects, the proposal has the potential to have impacts upon species, and habitats. The development does not directly affect designated sites and no significant effects on international, national or local sites are expected. A number of SSSI's have been identified within close proximity to the site. Individually, the development is unlikely to have any significant effect on this SSSI, although the cumulative effects remain unclear. There are ecological considerations that will need to be addressed through the planning application regardless."*

It is clear that individually, the council considered that from a Biodiversity (Species and Habitats) perspective, the proposed development individually is unlikely to result in any significant ecological effects:

The proposal has been designed to avoid or minimise ecological effects, and through appropriate mitigation and/or compensation measures any effects are fully mitigated. These measures can be secured through standard planning conditions.

However, from a cumulative perspective the council consider that ecological cumulative effects might arise.

In order to provide further clarity the following applications (cumulative schemes) within the surrounding context have been identified as part of a desk based study:

- [SMD/2022/0444](#) - Battery Storage (C&S) - Approved 22/12/2022
- [SMD/2022/0548](#) - Battery Storage (Sirius) - Approved 27/06/2023
- [SMD/2024/0019](#) - Battery Storage (Newfields Farm) - Pending
- [SMD/2023/0523](#) - Solar (Rownall Farm) - Pending

The ecological documents submitted with these schemes has been reviewed.

All of the schemes have been designed to work within existing green infrastructure corridors (hedgerows and woodlands). As there is no negative habitat fragmentation, there is no cumulative effect on species commuting, migrating or foraging in the local area, and in turn on wider connected designated sites.

As each of these schemes includes ecological habitat creation (such as scrub, trees, grassland, hedgerows, swales and ponds) and are individually having a positive effect on habitat availability, improving green infrastructure and connections to surrounding habitats, cumulatively there is likely to be a *beneficial* effect.

None of the schemes resulted in ecological effects that were not adequately mitigated within their site boundaries or through secured compensatory measures. As each scheme is fully mitigating its own ecological effects, then cumulatively the impacts cannot be more than negligible at worst.

In addition, all of the schemes aim to, or are required to deliver a Biodiversity Net Gain of 10% and in doing so the effect on habitats is quantifiably *beneficial*.

Overall, it is clear that no significant adverse ecological cumulative effects would arise. In fact schemes such as these result in a general beneficial ecological effect through establishment of more diverse habitats and long term management, on what is poor ecological value arable land.

For these reasons I do not consider that an EIA is required from an ecology and biodiversity perspective.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Neil Northrop', with a stylized, cursive script.

Neil Northrop  
Director