

Dear Declan Cleary

SMD/2024/0452

Environmental Impact Assessment (EIA) Scoping Opinion for a proposed development of a Battery Energy Storage System (BESS)

Land Adjoining New House Farm , Luzlow Lane , Bagnall , Staffordshire , ST9 9JZ

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:

- Request for Screening Opinion Letter, PWA Planning dated 17 May 2024
- Preliminary Ecological Appraisal, E3P, dated August 2024

SUMMARY –Staffordshire Wildlife Trust, having reviewed the information provided, has **no objection** and advises that there are unlikely to be any significant ecological effects arising from the proposed development.

The following documents would be required in support of any planning application:

1. An updated PEA (if more than 12 months has passed since current PEA was undertaken)
2. Full BNG Assessment
3. Protected species surveys for bats and GCN as outlined in the PEA prepared by E3P, dated August 2024

DESIGNATED WILDLIFE SITES

We note that Wetley Moor SSSI is located approximately 140m south west of the site but in our view it is unlikely that the SSSI would be impacted either directly or indirectly due to distance from the site and lack of direct habitat connectivity. There are no other statutory or non-statutory designated sites within or adjacent to the proposed development.

HABITATS

We have reviewed the PEA prepared by E3P (August 2024) and concur with the survey results which have identified that the site does not contain any habitats of significant ecological value. The survey was undertaken at an appropriate time of year by a suitably experienced ecologist, and the results can be considered robust.

PROTECTED SPECIES

As outlined in the PEA report prepared by E3P (August 2024) the site has the potential to support a range of protected species and we note and welcome the recommendation for further protected species surveys to be carried out for bats and great crested newts. These surveys should be completed within the appropriate survey window by suitably experienced and licenced surveyors, and the reports submitted in support of any planning application, including details of any mitigation and/or licences required to avoid disturbance or harm to protected species.

We note that a range of other species have the potential to be present and we note and welcome the recommendation for precautionary measures in relation to badgers, hedgehog, brown hare, nesting birds and reptiles. Details of measures to avoid disturbance or harm to these species should be set out in a Construction Environment Management Plan (CEMP) which can be secured by condition in due course.

INVASIVE SPECIES

We note the invasive non-native species Himalayan Balsam is present and we recommend that a suitable strategy for control/removal of this species is set out in a CEMP which can be secured by planning condition in due course.

BIODIVERSITY NET GAIN

Any future planning application will need to be accompanied by a full BNG Assessment carried out using the Statutory Metric. This should be based on an up-to-date baseline habitat survey and condition assessment, and the report should set out full details of proposed post-development habitats and target condition, including condition assessment sheets to justify how target condition will be achieved.

It should be noted that the Statutory BNG condition will be applied to any planning approval in due course, and this will require a Habitat Management and Monitoring Plan (HMMP) to be submitted. It is recommended that outline management recommendations are included in the BNG Assessment report to provide assurance that the stated habitat condition can be achieved.

In line with the requirements of the Statutory Metric, the development must deliver at least 10% net gain for habitat units, linear units and watercourse units (if applicable). If it is not possible to delivery 10% net gain within the site boundary, the applicant should set out in the BNG Assessment how the necessary net gain will be delivered e.g. through off-site habitat enhancement, or purchase of biodiversity credits.

Please note that we may wish to make additional comments upon receipt of the required information in due course.

Regards,

Dated 23 October 2024