

Technical Note 01

Project: 6769

Planning Ref: SMD/2024/0423

Date: 29/01/2025

Greenfields BESS

Consideration of Consultation Response Received

1 Introduction

- 1.1 Aspect Ecology Ltd is advising Enso Green Holdings Ltd in relation to ecological matters at the site, located at Greenfields Farm, Thorney edge Road, Stoke-on-trent.
- 1.2 The site is proposed for the construction, operation, maintenance and decommissioning of a Battery Energy Storage System (BESS) for distribution of electricity to the National Grid, for which a full planning application has been submitted to Staffordshire Moorlands District Council (SMD/2024/0423). The application was informed by ecological survey and appraisal work, the results of which are set out within the submitted Baseline Ecological Appraisal and Biodiversity Net Gain Assessment Reports (ref: 6769 EcoBase vf & 6769 BNG vf1, both dated August 2024).
- 1.3 Further to the application, consultation comments have been received in relation to ecological matters (dated 30th October 2024), which are stated to be provided by Staffordshire Wildlife Trust who are advising the Council with regard to ecology.
- 1.4 This note provides further consideration/response in regard to the ecological matters set out within the consultation response, with reference to the previously submitted information where appropriate.

2 Consideration of Matters Raised

- 2.1 The consultation response sets out a number of queries and concerns in relation to the submitted information. The comments from the Staffordshire Wildlife Trust are set out under the following headings:
 - Baseline Ecological Appraisal
 - Ecological Impact Assessment (EclA)
 - Biodiversity Net Gain
- 2.2 Further consideration is therefore set out below in relation to each of the individual headings raised.

3 Baseline Ecological Appraisal

Baseline Ecological Appraisal Addendum

- 3.1 As discussed within the Baseline Ecological Appraisal, a number of surveys were ongoing at the time of submission and needed to be reported within an Addendum report. A number of consultation comments received are in relation to the reporting of further survey work undertaken at site. We can confirm the Ecological Addendum report has been completed and is submitted alongside this response and will address the relevant comments.

Methodological Approaches and Assessment Criteria

- 3.2 A number of comments relate to the methodological approaches and assessment criteria used and will be addressed in turn below.

- *“Further habitat assessments against local criteria and clarification of some methodological approaches.” and “We would recommend that the habitats are also assessed against the Sites of Biological Interest (SBI) Guidelines for Staffordshire, to understand the importance of each habitat/features within the Local/Regional context as required under the CIEEM Guidelines for Ecological Impact Assessment in the UK and Ireland. The information is available here <https://staffs-ecology.org.uk/partners/sbi-guidelines/sbi-guidelines-introduction/>.”*

- 3.3 Habitats within the site have been assessed against the Sites of Biological Interest (SBI) Guidelines for Staffordshire as requested; this is detailed in Table 3.1 below.

Table 3.1. Assessment of on-site habitats against SBI Guidelines

Habitat	Level of Importance within Baseline Ecological Appraisal	Assessment Against SBI Guidelines
Semi-improved Grassland	Not an Important Ecological Feature	Does not score above 14 on the checklist provided within the guidelines
Modified Grassland	Not an Important Ecological Feature	Does not score above 14 on the checklist provided within the guidelines
Scrub	Not an Important Ecological Feature	Not listed within the guidelines
Tall Ruderal Vegetation	Not an Important Ecological Feature	Does not meet the definition within the guidelines
Bare Ground	Not an Important Ecological Feature	Not listed within the guidelines
Woodland	Not an Important Ecological Feature	Less than 0.5ha present on site, in any case, the woodland does not score the required minimum of 6
Hardstanding	Not an Important Ecological Feature	Not listed within the guidelines
Hedgerows	Local	A single hedgerow (H2) qualifies under the SBI guidelines as it has five woody species. This hedgerow has already been identified as an important ecological feature and as such, has been retained where possible and new planting is proposed to compensate for any losses.
Tree Lines	Local	Not listed within the guidelines
Ditches	Not an Important Ecological Feature	Not listed within the guidelines
Individual Trees	Not an Important Ecological Feature	Not listed within the guidelines

- *“The ‘Bare Ground’ habitat is described as including plant species developing over crushed aggregate / waste building materials and as such the habitat should be checked against the Open Mosaic Habitat on Previously Developed Land and/or sparsely vegetated land definitions to more fully describe/evaluate the habitat type.”*

3.4 The areas of bare ground comprised a gravel, crushed aggregate, and soil farm access tracks, currently in active use, with little vegetation present. These areas were also uniform in nature and no friable soils were present, and as such, did not meet the definitions for either of these habitats.

- *“We note that the Methodology does not refer specifically to a hedgerow survey using the Hedgerow Survey Handbook methodology but that some aspects of the assessment does appear to be presented in Table 4.1. We would welcome clarification on the approach taken.”* and
- *“We agree that all hedgerows on site constitute an important ecological resource along with their associated features such as ditches or trees. We note that all ditches and trees are reported as not constituting an important ecological habitat feature, however where they are associated with a hedge we would recommend they are included in the hedge classification and treated appropriately.”*

3.5 We are pleased to confirm that, although not explicitly stated, the methodology within the Hedgerow Survey Handbook was followed during the survey undertaken. As shown within Table 4.1 in the Baseline Ecological Appraisal, the ditches and trees associated with the hedgerows are captured within the hedgerow description and assessed as a part of these features as important ecological features.

- *“The Baseline Ecological Appraisal report does not include hedgehog or brown hare, both of which are Species of Principal Importance.”*

3.6 As set out within the Baseline Ecological Appraisal, no specific evidence from the desktop study or survey work undertaken identified the present of these species on site or in the surrounding area. The site is therefore clearly not of importance to these species, and as such, no likely significant effects are anticipated in the absence of mitigation for these species, nonetheless safeguarding measures set out in regard to other mammals will serve to safeguard these species, if present. In addition, any fences included within the proposed development will be permeable to allow movement across the site.

4 Ecological Impact Assessment (EcIA)

4.1 A number of comments referred to updates to the Environmental Statement Ecology Chapter, if required, following the Ecological Addendum. Given the conclusions within the Ecological Addendum are in line with those reported in the Baseline Ecological Appraisal, the Environmental Statement Ecology Chapter does not require updating.

- *“We note that Wetley Moor SSSI is located approximately 450m to the west of the site and we agree with the assessment that it is unlikely that the SSSI would be impacted either directly or indirectly by the individual scheme proposals, due to distance from the site and lack of direct habitat connectivity. The assessment should however also consider the cumulative impact on this designated site.”*

4.2 Cumulative impacts on Wetley Moor SSSI are addressed at paragraph 5.10.3 within the Environmental Statement Ecology Chapter.

- *“The limitation of the assessments for great crested newts (GCN) due to lack of access, and this is not captured sufficiently within the ES.”*

4.3 As discussed within the submitted information, the closest ponds to the site were confirmed to have no evidence of Great Crested Newts following an eDNA survey for this species. The remaining two ponds, to which access was denied, are both approximately 250m or more from the proposed area for development. In any case, using the Rapid Risk Assessment tool from Natural England to assess impacts of the development on these ponds returns a result of ‘Green: Offence Highly Unlikely’, such that even if newts are present within these ponds, development of the site is highly unlikely to negatively impact this species.

4.4 A number of comments referred to need for updated bat survey work which is provided within the Ecological Addendum submitted alongside this response.

- *“In Table 5.4 consideration should be specifically made to ground nesting birds (alongside hedge/scrub/tree nesting species) given the extensive pasture on the Site, with appropriate supporting information provided as required in the ES. If ground nesting birds may be present, this should be included in the precautionary measures for nesting birds.”*

4.5 Ground-nesting birds are considered unlikely to be present at the site given the largely unsuitable habitats present in the form of grazed, short-sward grassland. As such, no specific precautionary measures are necessary in regard to ground-nesting birds and nesting birds are already provided for in general at 5.7.9 of the Environmental Statement Ecology Chapter. As discussed within the submitted information, new habitat creation will provide enhanced opportunities for nesting birds, including ground-nesting species, along with enhanced foraging for this species group.

- *“We would expect trees to potentially develop a greater number of features for roosting bats over time and would a narrative on this should be included in the Future Baseline section.”*

4.6 It is agreed that the suitability of trees to support roosting bats changes over time, indeed some trees will likely become less suitable for roosting bats as weather events cause features to be lost and degraded, at the same time as other trees become more suitable. The boundaries of the fields, where the trees are located, are identified within the submitted information as being of importance for roosting, foraging, and commuting bats, and it is considered they would remain important in the Future Baseline. Therefore, the statement that *“baseline conditions within the Application Site would be expected to remain relatively constant in the future”* made within paragraph 5.4.9 of the Environmental Statement Ecology Chapter is considered appropriate and accurate.

- *“The proposed enhancement measures are welcome however information on bat/bird box numbers and number of habitat piles is required for clarity, ideally with a corresponding draft location plan.”*

4.7 It is considered that this can be secured by means of a suitably worded planning condition.

5 Biodiversity Net Gain

- *“Does the note that some habitats are included in the Local Plan (see Metric spreadsheet notes) warrant increasing the Statutory Significance of these habitats and if not, why not.”*

5.1 Following the guidance within the Statutory Biodiversity Metric User Guide, it is understood that no formal LNRS is available, and no alternative documents have been specified. The

habitats are not considered, using professional judgement, to meet the criteria for 'Medium' significance and have thus been categorised as 'Low' within the metric.

- *"Do any ditches on site (as described in the Baseline Ecology Appraisal report) meet the 'ditch' criteria for BNG and if not, why not."*

5.2 None of the on-site ditches were considered to meet the BNG criteria due to not holding water for more than four months of the year.

- *"A clear and full justification for the selection of 'Good' condition (the highest condition category) for created shrub and grassland (as presented in the Metric spreadsheet) should be provided. Our opinion is that 'Moderate' would be a more realistic assessment."*
- *"Please note, in the BNG Assessment report, created mixed scrub is given a 'Moderate' condition which is different to the Metric spreadsheet submitted."*
- *"The summary of net change in the BNG Assessment report (Table 4.4) does not wholly match that within the Metric spreadsheet, and this should be checked."*

5.3 A justification for the selection of 'Good' for proposed mixed scrub has been provided within the submitted information within the BNG Assessment report within Table 4.1. The condition rationale addresses each of the BNG condition criteria and how the proposed habitat will pass them. The BNG Assessment report contains a typo where the target condition has been labelled as 'Moderate', this should be 'Good'.

5.4 An error is present within the submitted BNG document. Paragraphs 4.5.2 and 4.5.3, along with Table 4.4 of the BNG Assessment report should read as follows:

"4.5.2 When considering the current proposals, and on the basis of the assumptions set out, the Metric calculates that the development will likely result in the following changes in biodiversity, summarised in Table 4.4 (below):

Table 4.4. Anticipated change in biodiversity

	Change in Units	% Change
Onsite Habitats	+4.98	+12.64%
Onsite Hedgerows and tree lines	+3.13	+84.69%
Onsite Watercourses	N/A – No watercourses present	

4.5.3 On the basis of the considerations and proposals set out (including the assumptions and limitations set out above and within the comments in the spreadsheet tool), the Statutory Metric calculator indicates a net habitat biodiversity unit change for the proposals within the site boundary of +4.98 Habitat Units (representing a calculated gain of 12.64%) and +3.13 Hedgerow Units (representing a calculated gain of 84.69%) within the site boundary."

- *"Consideration should be given to opportunities to enhance retained habitats."*

5.5 Where possible within the site habitats will be retained and enhanced. The precautionary approach within the BNG Assessment demonstrates even if this is not possible due to the construction works, net gain can still 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.”

- 5.6 These are provided at Table 4.1 within the BNG Assessment report within the submitted information.

6 Other Considerations

- 6.1 With the exception of the individual matters discussed above, no other specific ecological considerations or concerns appear to be raised within the comments received and accordingly no such matters appear to require further consideration in relation to the proposed development.