

Dear Sir/Madam

SMD/2024/0423

**Battery Energy Storage System and substation with associated infrastructure and works
Land at Greenfields Farm, Thorney Edge Road, Bagnall ST9 9LA**

Site Area: 9.74ha

Staffordshire Wildlife Trust has been asked to review further information submitted as part of the above application.

We have viewed the following additional documents:

- Consideration of Consultation Response Received (Aspect Ecology, 29/01/25)
- Ecological Addendum: Further Phase 2 Protected Species Surveys (Aspect Ecology, January 2025)

SUMMARY – Staffordshire Wildlife Trust, having reviewed the additional information provided, recommends that the holding objection can be removed and that **additional suitably worded conditions** can be applied.

Further commentary is provided below.

DESIGNATED WILDLIFE SITES AND PRIORITY HABITATS

Cumulative assessment of potential impacts on Wetley Moor SSSI is provided and identify no significant impacts. No further comment.

HABITATS

Several points of clarification were requested on habitat assessment, and these have all been addressed within the additional material provided. No further comments are made.

PROTECTED SPECIES

Several points of clarification / requests for further data were made in relation to protected species, particularly in relation to surveys that were on-going at that time, and these have been addressed within the additional material provided.

Our previous comments identified that the details of measures to avoid disturbance or harm to protected species should be secured by condition and, based on the additional information provided, we recommend that measures for the protection of brown hare, hedgehog and ground nesting birds should also be included within this condition.

ECOLOGICAL IMPACT ASSESSMENT (EcIA)

A number of points were raised in relation to the EcIA, many of which are addressed through the provision of the additional detailed material provided. Further comments are however made, as follows:

We are still concerned that the potential for change in the PRF status of trees on site has not been fully integrated into the assessment and disagree that PRF status is likely to '*remain relatively constant in the future*'. We also note that the outline CEMP (oCEMP) includes the provision for some tree crown works and this needs to be considered alongside the PRF status of each tree at the time of works. We therefore recommend that this is addressed through a suitably worded condition requiring an update GLTA and, following the update GLTA, measures to adequately protect/manage any trees with roost features to be included in the CEMP.

CUMULATIVE IMPACT ASSESSMENT

No further comments.

BIODIVERSITY NET GAIN

Previous comments and points of clarification/further information on the BNG were requested and further information provided. After reviewing this information, we would like to make the following additional comments:

- Statutory Significance of habitats – we have reviewed the habitats on site against the Net Gain Staffordshire Nature Recovery Network Map (<https://netgainstaffs.com/map/>) and are content that the use of the Low criteria is acceptable. No further comment.
- Ditch classification – further information provided, no further comments.
- Justification for the selection of 'Good' condition (the highest condition category) for created shrub and grassland (as presented in the Metric spreadsheet) - our considered opinion is that 'Moderate' would be a more realistic assessment, particularly for other neutral grassland where achieving 10 or more vascular plant species per m² is an essential criteria for Good condition. We note that achieving Moderate condition for grassland creation areas results in the Metric not meeting the minimum targets. Furthermore, the proposed single grass cut may not achieve/maintain the desired result (ie may not remove sufficient nutrients from the grassland to maintain an appropriately diverse sward). To this end, we would recommend the Biodiversity Gain Plan, CEMP and LEMP documents are informed by the results of suitable soil nutrient testing and that management options and/or target habitat conditions are reviewed and adjusted in line with the soil nutrient results to demonstrate the feasibility of meeting the proposed condition targets set for scrub and grassland creation.
- Differences between the BNG report and the Metric have been corrected. No further comment.
- Opportunities for habitat enhancement – we recommend that habitat enhancement for retained habitats are included in the LEMP where possible.

I trust the above is clear and helpful.

Regards,

Dated 14 March 2025