

SMDC Planning Reference –	DOC/2024/0090		
Site Name –	Rownall Road BESS		
Summary of proposals -	Review of Landscape Design Proposals – Option 1 and BNG Report both dated May 2025		
Consultation Note Subject –	Landscape and Visual Matters		
Planning Case Officer –			
Landscape comments prepared by –	Ryder Landscape Consultants		
Date(s) of site visit —	2022 & 2024	Date of this response	11/6/25
Number / Purpose of note	No.1 - To consider the submitted detail landscape design and BNG reporting and whether they satisfy Conditions 12, 14 & 19 of Decision Notice SMD/2022/0444.		
Summary of consultation response	• General satisfaction with soft landscape element of the proposals and the BNG Report subject to written confirmation/clarification of minor details. • The updated Landscape Management and Maintenance Plan provides a good level of information to help reduce the risk of planting failure and subject to minor additions/clarifications can form the basis of ongoing landscape management and maintenance on Site. • Notwithstanding the existing agreement to stone surfacing and tarmac apron off Rownall Road where the details of the hard landscape proposals are required to aid in the discharge of Condition 12. • Condition 14 can be discharged with a series of minor modifications to the existing Stephenson Halliday LEMP. • Condition 19 can be discharged based on the current submitted information.		

Dear Madam

Cellarhead BESS (Rownall Road side) - Landscape and Visual Consultation on Discharge of SMD/2022/0444 Planning Conditions 12, 14 & 19.

This note is ordered on a Condition by Condition basis with a digital snip of the original condition set first and then discussion of submitted material before finishing on what I consider to be required to complete the discharge of the individual condition.

1. Condition 12 – Landscape Treatment Condition

Landscape/Visual Impact

12. Notwithstanding the submitted details, no development including site clearance and stripping shall commence until such time that a detailed hard and soft landscape mitigation scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on Landscape Mitigation Plan (Figure 6, Dec 2022 Revision 1) and be at an appropriate scale. The soft landscape proposals approved shall subsequently be implemented in the first growing season after construction has commenced and replacement of dead, diseased or dying stock should be undertaken in accordance with the Landscape Maintenance and Management to be approved under Condition 14. Hard landscaping shall be carried out as approved and before the development is brought into use

Reason:- To protect the character and appearance of the area

To consider Condition 12 the two Landscape Planting Plan drawings prepared by Stephenson Halliday and dated 15th May 2025 were reviewed:

- Landscape Planting Plan Option 1 – Sheet 1 of 2 Dwg No. CELDC-SH-ELS-DR-LS-001 01 Rev 12
- Landscape Planting Plan Option 1 – Sheet 2 of 2 Dwg No. CELDC-SH-ELS-DR-LS-002 01 Rev 09

Overall I found the plans to be reflective of the **soft landscape mitigation proposals** as discussed previously with the Applicant and their Landscape Architects. Likewise the species types, planting centres and suggested mixes are considered appropriate for native planting at the Site. The inclusion of Horse Chestnut to reflect the others in the area is welcome. I do however have a series of minor points that can be clarified by an exchange of e-mails.

Drawing 01 Key

- The tree removal symbol states 'Potential Tree Removal / Aspirational Tree Retention' – Am I correct in reading this that these are the proposed trees for felling but the aspiration is to retain them if possible?
- Reference to Proposed Specimen Tree (Form) – what does the reference to Form mean in this situation?
- Reference to 'Specimen' trees in the key – are they really specimens, or is standard a more apt description?
- Proposed seeding on re-profiled ground is indicated as EG10 Tussock Grass Mix or equal approved. Tussock Grass sward when mature basically precludes mowing as a management technique, this is not specifically covered off in the LEMP?
- I could not find details of the ESG2 Fine Grass Mixture that is proposed for use as an overseeding mix for larger areas of retained grass. Is it an old Emorsgate Mix as they do not seem to detail it on their website?

Drawing 01 Plant Schedule

- In the proposed Infill Hedge Schedule the trees section is indicated as 50% Hawthorn, please confirm that these are just part of the overall hedge mix and they have been placed as 'trees' due to the nature of the scheduling package? I see they are to be planted as a single species 'back' to the hedge as described in the LEMP.
- There are no planting distances or discussion of double staggered rows for the hedge planting. I have scaled the drawing and it appears at 5No. plants per linear metre – this is now confirmed in the LEMP.
- Within the proposed woodland planting I would suggest that the Oak planting is better as light standards or feathered whips to reduce the planting stress and stasis that larger oak can go into.

Drawing 01 Proposals

- Top north west corner of the proposals where the Electric HV cable is proposed will existing trees need to be felled and will its presence restrict planting that can occur at this corner of the Site?
- I was somewhat concerned that there is an annotation stating, 'Earthwork design is indicative. Client / suitably qualified Engineer to design embankments in line with appropriate legislation.' This is too loose a description for a final drawing that is to be used to discharge a planning condition. I understand that the final amount of excavated material is subject to change but if SMDC agree to an indicative shape and area it has no control over height, profile or how it is blended back into surrounding ground levels. One suggestion is to

give parameters for the embankment's gradients and description of its profile so that they are enforceable on the ground.

- What is the mid-green hatch with yellow cross hatch running through it on the west side of the embankment? It is not indicated in either drawings key but a large quantity of scrub plants are keyed into the area in the bottom right corner of the drawing.

Drawing 02 Proposals

- Trees species set within the retained grass field to the east are insignificant in size and presence and could be swapped for larger parkland stock such as oak, lime or beech that will deliver longer term and more characterful landscape benefits.
- The distribution of tree species within the entrance hedge should be more randomised, at present they are shown as short blocks of the same tree species which would appear artificial in form.

Drawing 02 Establishment Notes

- The desire for local provenance stock is welcome but not likely achievable for all species, it could be widened out to stock of 'local or regional provenance'.
- No reference to tree protection measures such as individual tree guards, shelters or wider rabbit proof fencing for larger blocks of planting. Rabbit browsing should be anticipated and arguably deer and brown hare as well.

Hard landscape information

There is no information regarding hard landscape proposals on either drawing.

Material required to discharge Condition 12

The Applicant is advised to submit additional information or direct the Planning Authority to existing details contained in the overall planning submission to address the following:

- **Hard landscape treatments** – typically related to proposed surfacing types, fenestration and gates. Site furniture such as bollards and crash barriers, lighting and signage should also be detailed in terms of location, size and appearance. Typically a Hard Landscape General Arrangement Drawing (GA) backed up with a Hard Landscape schedule would be sufficient. Careful consideration of how the boundaries address the adjacent land and Rownall Road corridor is advised. Hard landscape details associated with the attenuation basin can be dealt with via Condition 22.
- **Addressing soft landscape minor points** – an e-mail to answer the questions identified above and an undertaking to reflect the changes in an updated revision of the soft landscape plans is suggested.

2. Condition 14 – Landscape Maintenance and Management Plan (LEMP)

14.No development shall take place until such time that a Landscape Maintenance and Management Plan (LMMP) has been submitted to and approved in writing by the Local Planning Authority including measures for its operation for the life of the development.

Reason: – To reflect the importance of the soft landscape mitigation proposals for the local landscape character.

I initially reviewed the document from 14/10/2024 prepared by CBE Consulting, I then reviewed the later Stephenson Halliday document which contains more specific details and is a more helpful document. Its reference is 0898-SH-XX-XX-RP-L-1200 dated April 30th 2025. Set below are a series of minor comments and clarifications suggested to aid the implementation of the described works and

to allow its use as a reference by SMDC should there be concerns about the standard of care for the mitigation works.

- Section 1.1.7 it is stated that the document is not a contractual document but it will be relied upon by Staffordshire Moorlands District Council for the oversight of delivery and establishment of the landscape works.
- Section 2.1.1 the objectives should list out 'retain as many existing site trees as possible' and 'deliver a positive interface with the Rownall Road corridor'.
- Section 3 . 1.1 the site has been used as pasture and the report should perhaps say cereal or arable crop and grazing land use.
- Section 4 . 1.1 the gabions are a potential habitat and later in the report at section 12.4 this is acknowledged perhaps a forwarding reference to this section can be included.
- Section 5 . 1.4 it is suggested that the reliance on local provenance stock is widened 2 local and regional prominence stock as I suspect they will not be sufficient or broad enough species available with a local provenance.
- Section 5 . 1.9 is the use of man-made topsoil as an imported source of topsoil being ruled out by this section? It will be highly unlikely that imported topsoil is required as the materials management plan is suggesting but 3000 cubic metres are exported from site.
- Section 5 . 2.1 is the overall vision as cited in this section the same as the landscape strategy described it Section 2 . 1.1?
- Section 5 . 2.5 the inclusion of the ap.ed contractor who will it be take that on Skype establishment works after the first 12 months is a welcome one please can be updated version of this report with the landscape contractors name included within it be shared with Staffordshire Moorlands Council when it is confirmed.
- Section 5 . 2.6 here there is a suggestion of assessment or a biannual basis it would be useful to have the work activity frequency i.e. how often the landscape contractor will visit the site listed here.
- Section 7.2 implementation of individual tree planting. The pits are described at 750 mm deep, it would be better to describe their depth to match the root ball that is being planted this is to save saturated organic matter sitting underneath the root ball. There is no description of any tree protection from either grazing stock dear all the streaming of grass in the vicinity of the individual trees. This is particularly important for the individual trees set within the meadow to the east of the Site. The replacement of planting annually within the first five years is specifically requested within this section.
- Section 8.2 implementation of woodland. Scots pine and holly stock require larger diameter shelters than 75 to 100 mm diamter given their broader coniferous habit. What is the applicant's assessment or strategy towards deer browsing of this wooded stock? Finally replacements of failed whip transplant another tree planting should be replaced annually within the first five years in the first planting season to the identification of failure.
- Section 9.2 implementation of scrub planting. The holly needs a broader planting tube. Likewise replacement to failed scrub plants should become rooted on an annual basis.
- Section 10.2 implementation of native hedgerow planting. The planting of the hedgerows with the hawthorn species set at the back is interesting and will hopefully present a mixed hedgerow to the front side that is visible. With regards to the actual planting two methods are given notched and the digging of a trench which is the actual one that is proposed. Like previous comments the holly will require a wider planting tube. I know that there is no barrier or bark mulch specified so the applicant will be relying on her beside treatment to control weed species along the hedge lines a figure of maintaining an 1 metre diameter area

around each tree he suggested. This may be a carryover from the tree planting section above. It is recommended that an easiest statement to make is kick the hedge line in a weed free condition. Continue in section 10.2 there is reference to the application of fertiliser but who actually specifies the amount for the first three years ideally this should be given in a grammes per linear metre measure. Like the other planting forms replacement or failed hedgerow plants should become rooted annually. The stated clipping of the hedgerow to take a hedge form is unlikely to be required at Year 5 given this is a semi upland location and plant growth may be slower than anticipated. It is suggested that the decision to cut the shape the hedge is taken after one of the annual inspections of the landscape management plan.

- Section 11.1 neutral grassland it's good to see up-to-date references with regards to the grass seed mixtures book I do not think that they correspond with those given on the drawing. Please can the drawing be checked and updated to match this specification.
- Section 11.2 wildflower plugs. It is assumed that the wild flower mix has now been dropped from the general neutral grassland seeding. This appears to have been replaced with the use of wild flower plugs however the location and area of such plug planting is not shown on the landscape drawings.
- Section 11.5 maintenance operations for neutral and species rich neutral grassland. There are repeated references to wild flowers but none are specified other than the wildflower plugs.
- Section 13 A 5 year monitoring and update is considered appropriate.
- Section 13 . 1.2 this section recognises replacements in the next growing season but please can you include in the earlier tables a similar reference to replacement to failed stock on an annual basis.
- Section 13 . 1.3 discusses the replacement of failed species with a suitable alternative as suggested by the ecologist. Please can the word native be inserted into this section to confirm but it is native stock that is required.
- Appendix A - it is good to see that monthly maintenance visits will be undertaken and I presume this is for the first year post planting only. This level of attendance will be beneficial for the successful establishment of stock.
- Appendix A - The reference to back boxes and the checking of them should have a warning associated with it saying the bat boxes can only be opened disturbed moved or taken down by a licenced and competent bat trained ecologist.

The discussion of soil preparation is given under each planting type. It gives a broad enough description of the works to be acceptable. The description of soiling and grass seeding does not extend to the proposed deposition area to the South of Rownall Rd. It is advised that the reinstatement of any deposition areas so they can be successfully sown have or planted is covered within the Materials Management Plan.

Material required to discharge Condition 14

Updating of the Stephenson Halliday report to respond to the points laid out above will bring it to a point where it discharges Condition 14.

3. Condition 19 – Biodiversity

There are five elements within this condition that need to be addressed by the submitted information.

Biodiversity

19. No development including site clearance and stripping shall commence until such time that a Landscape and Ecology Management Plan (LEMP) has been submitted to and approved in writing by the Local Planning Authority. It should include the following although this list is not exhaustive

- (1) Details of habitat creation and species enhancements
- (2) Updated BNG calculation using latest Defra metric and UK Habs baseline and post-intervention plans
- (3) Soil preparation details.
- (4) Appropriate planting/ seeding specifications.
- (5) Long-term habitat management plan.

The development shall be carried out strictly in accordance with the approved LEMP

Reason:- In the interests of biodiversity enhancement and to ensure a new gain in biodiversity

The primary sources of information addressing these Condition 19 sub-points are:

- BNG Net Gain Report by RSK Biocensus dated May 2025;
- The two Soft Landscape proposals drawings; and
- The Stephenson Halliday LEMP document.

Taking the five sub-points in turn I have found the following:

- 1) That the details of habitat creation and species enhancement are provided in both the BNG report and the soft landscape drawings;
- 2) An updated BNG calculation has been provided and this indicates a minimum 10% enhancement for all habitat types;
- 3) Soil preparation details are given in broad terms within the description of implementation of the various habitats to an acceptable level;
- 4) Appropriate planting / seeding specifications have now been given within the LEMP; and
- 5) The long-term habitat management plan with actions marked out across forthcoming years is supplied in Appendix B of the Stephenson Halliday LEMP.

Material required to discharge Condition 19

- No other information is required and Condition 19 can be safely discharged.

4. Overall summary

At this stage Condition 19 of the three landscape orientated conditions can be discharged .

The landscape drawings and LEMP are almost at a point where they can fully discharge the other two conditions. I consider the landscape proposals are appropriate it is more a case of further details with regards to hard landscape treatments and clarifications of some planting and establishment matters are required.

Continued assistance to the Applicant has been given by setting down what outstanding information is required to discharge each of the three Conditions.

Please contact me should you wish to discuss these points further.

Ryder Landscape Consultants

11/6/25