

Date: 19th June 2025
Letter Reference: 81-730-L2



By email

ECOLOGY STATEMENT – LUZLOW BESS, STOKE ON TRENT

E3P has prepared a Letter Statement in response to ecology comments received from Staffordshire Wildlife Trust, received 25th March 2025, regarding the planning application at Luzlow BESS, Stoke on Trent (Application Reference: SMD/2024/0568). This statement has been produced in relation to comments received about the Biodiversity Net Gain (BNG) Assessment.

Comment received: *Ditch creation- There is a ditch on site in the baseline. The metric states that the entirety of the ditch is to be lost. The on-site creation tab states that a ditch of the exact same length and condition is going to be created. When looking at the proposed map, the ditch is in the same location on site. Instead of the metric showing the ditch to be lost and created, it should simply say that it is being retained.*

Response: Regarding the on-site ditch, due to the encroachment of the proposed development on the western bank of the ditch, the ditch will be in a poorer condition post development than it currently is during the baseline. As a result, we have followed standard guidance in which we have to show the ditch as being lost and then created with moderate encroachment on the western bank, even though the ditch is technically being retained. We have detailed this in Section 3.6 of the report as follows: *Due to the proximity of the development to the right bank top of the ditch, there would be an increase in riparian encroachment, as this will increase the encroachment from 'no encroachment' to 'moderate'. The ditch has been input into the metric as 'created', which will decrease the overall river units on site.* Therefore, as the ditch will become more deteriorated from its current state as a result of the development, there is a loss of watercourse units, which is compensated by the proposed new ditch on site.

Comment received: *Other Neutral Grassland. The baseline suggests all the other neutral grassland on site is being lost, and in the creation tab that it is being created again. However, it should state that some of the grassland is to be lost, and the rest is going to be enhanced to moderate condition. This is the same for the off-site grassland, some areas of it will be lost to the ditch but the rest is to be enhanced.*

Response: We have proposed that the grassland will be lost and re-created, as it is easier and more effective to create a new grassland rather than trying to enhance an existing grassland. This is reflected by the metric as enhancing grassland scores lower than if a grassland is removed and a new grassland is created in its place. Enhancing the grassland would result in a net gain of 16.15%, whilst creating a grassland results in a net gain of 24.58%.

Comment received: *Red line boundary. The off-site area is directly adjacent to the site. It may be better for the metric that the whole area is included in the red line boundary so that all the enhancement and creation take place on-site.*

Response: The boundaries have now been updated, and all habitat creation is proposed on-site.

Yours sincerely,
For and on behalf of E3P Ltd

Huw Morgan
Principal Ecologist

