

Land East of Cellarhead Substation SWT Comments

Sept 2025

Date: 18th September 2025

Application Reference: DOC/2024/0090

Location: Land East of Cellarhead Substation, Rownall Road, Wetley Rocks

Proposed Development: Discharge of conditions 12, 14 and 19 relating to SMD/2022/0444

Staffordshire Wildlife Trust has been asked to review documents to discharge the above conditions as part of a service level agreement with Staffordshire Moorlands District Council to provide ecology advice regarding planning and development management functions.

Documents Viewed:

- Biodiversity Impact Assessment, C.B.E Consulting, 15th November 2022
- CELDC-SH-ELS-DR-LS-001 rev13, 04/10/2024 Stephenson Halliday
- CELDC-SH-ELS-DR-LS-002 01, Rev 10 04/10/2024 Stephenson Halliday
- CELDC-SH-ELS-DR-LS-006, Rev 00 24/06/2025 Stephenson Halliday
- Landscape and Ecological Management Plan, Landscape Maintenance and Management Plan, and Soft Landscape Mitigation Plan. 0898-SH-XX-XX-RP-L-1200, 25th June 2025
- Illustrative Landscape Y10 Planting Section Sheet 1 of 3 CELDC-SH-ELS-DR-LS-003, 14/10/2024 Stephenson Halliday
- Illustrative Landscape Y10 Planting Section Sheet 2 of 3 CELDC-SH-ELS-DR-LS-004, 14/10/2024 Stephenson Halliday
- Illustrative Landscape Y10 Planting Section Sheet 3 of 3 CELDC-SH-ELS-DR-LS-005, 14/10/2024 Stephenson Halliday
- Biodiversity Net Gain Assessment, RSK Biocensus, May 2025

Summary: We recommend that the following queries are resolved before the LEMP and LMMP can be accepted. We envisage these should be relatively quickly rectified.

- Include enhancement of watercourses from BNG into the LEMP
- Please respond to the query relating to Green-leaved Hawkweed
- Minor changes to grassland management
- Details of number, type and citing of bat boxes to be provided.
- Query about grassland mix under woodland and hedges
- Answer queries relating to monitoring schedule

Further detail

Conditions to be discharged

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

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.

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

BNG

Watercourses

The BNG metric and report state that watercourses on site are to be enhanced from 1.49 units to 1.65 units. The BNG report states '*The LEMP will be updated to include Ditches, once the plans have been revised to include how they will be enhanced or newly created to provide a net gain*' The LEMP does not mention watercourse enhancement, so it is unclear how this will be done and maintained for 30 years. This needs to be included.

LEMP and LMMP

LEMP and SWT Previous Comments

SWT Previous relevant comments recommendations to consider (in green)

Wooded areas should be sown with a woodland or hedgerow wildflower mix

It appears that areas of woodland and under hedgerows are being sown with EG10 tussock mix and EM2 standard general purpose mix. An explanation as to why these have been chosen over a woodland mix is requested.

Records from Staffordshire Ecological Record show that a scarce plant, Green-leaved Hawkweed *Hieracium acuminatum* has been recorded on the site at SJ951495. This area is not proposed to be affected but would be planted with trees. The plant, if still present, should be identified by a botanist and protected as part of the LEMP.

This is not mentioned in the LEMP – please provide an explanation for this

Subsoil should be spread over topsoil when making level changes and creating bunds, so that more nutrient poor areas are created for seeding. Details to be included in the LEMP.

Recommendations are for rotovating, which is not as good for creating species rich grasslands as spreading subsoil over topsoil, however, given the low aspirations for grassland quality in the BNG metric, we feel that the current suggestions are sufficient.

T31, an over mature/veteran tree would potentially be removed? This should be avoided.

The only trees to be removed are T10 and T11, therefore we are happy that this comment has been upheld.

Scrub Planting

Please check the number of plants being provided in the scrub is appropriate, 4379 plants mention in the plan CELDC-SH-ELS-DR-LS-001 rev13 appears quite high for an area of 0.0847ha mentioned in the BNG metric.

Neutral Grassland

Species Rich Meadow

11.5. The first-year maintenance recommendations are not in line what we would recommend and also with the supplier's recommendations, the LEMP should be updated accordingly; the supplier's recommendations for EM2 are '*Most of the sown meadow species are perennial and are slow to establish. Soon after sowing there will be a flush of annual weeds, arising from the soil seed bank. These weeds can look unsightly, but they will offer shelter to the sown seedlings, are great for bugs, and they will die before the year is out. So resist cutting the annual weeds until mid to late summer, especially if the mixture contains Yellow Rattle, or has been sown with a nurse of cornfield annuals. Then cut, remove and compost. Early August is a good time. This*

will reveal the young meadow, which can then be kept short by grazing or mowing through to the end of March of the following year. Dig out any residual perennial weeds such as docks.'

Bat Boxes

12.1 Please provide details of the number, type and citing of bat boxes, ideally incorporated into the landscape plan.

Monitoring

General – please add the type of habitat to the maintenance operation title to avoid any confusion.

13.1.1 We would recommend a slightly later monitoring period (survey) to allow more grassland species to be visible and more easily identified. We would suggest May to mid-July prior to being cut.

Appendix A: Annual Maintenance Schedule

Trees / hedges / scrub

Monitoring and pruning / remedial surgery is recommended in June – August. This is during the bird breeding season. This will not be a problem when plants are small and growth is not dense. However, measures should be taken to either avoid the bird breeding season or have checks before any work is done by a suitably qualified Ecologist if work is to be done in the bird breeding season once the trees / scrub is taller and nesting birds may be hidden.

Hedge cuts are usually undertaken in winter months – we recommend January or February as this will provide a maximum amount of time with berries for wildlife. The maintenance schedule suggests October, we would recommend this is updated.

Species Rich Neutral Grassland

Include collecting up cuttings on the schedule – this is vital for species rich grasslands to remove nutrients.

Resowing – spring and autumn are both ok for this, however, some seeds need to be frosted before germination, so ideally autumn would be preferred.

Bat boxes

Implies monthly inspections of bat boxes by a licenced Ecologist which seems excessive – clarification may be required if this is not intended.

Watercourses

The BNG metric and report state that watercourses on site are to be enhanced from 1.49 units to 1.65 units. The LEMP does not mention watercourse enhancement, so it is unclear how this will be done and maintained for 30 years. This needs to be included.