

Tean Leys Farm SWT Comments

Date: 12.02.2026

Application Reference: SMD/2025/0247

Location: Tean Leys Farm , Tean Leys , Lower Tean , Staffordshire , ST10 4NS

Proposed Development: Development of a battery energy storage system (BESS) connecting to the local electricity grid with associated infrastructure, customer substation, cable routing, access, security fencing and landscaping.

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

Documents Viewed:

- Application form
- Updated Ecological Impact Assessment- Clarkson and Woods, October 2025
- Biodiversity Net Gain Statement- Clarkson and Woods, May 2025.
- Tean Leys Statutory Biodiversity Net Gain Metric- Clarkson and Woods, May 2025
- Site Location Plan- Island Green Power, April 2025
- Offsite Biodiversity Net Gain Area- Island Green Power
- Site Layout Plan- Island Green Power
- Landscape Masterplan- Lanpro, February 2025
- On-site HMMP Draft- Clarkson and Wood, December 2025
- Off-site HMMP Draft- Clarkson and Wood, December 2025

Summary: We recommend a **holding objection** until the following information is supplied and our comments are resolved:

- Please supply the BNG condition assessments
- BNG metric and report and HMMP do not match for off-site habitat, metric and HMMP says creation of mixed scrub and unsealed surface , the plan in BNG report shows creation of other neutral grassland. The value of biodiversity units also does not match. We will re-assess the BNG information when the correct information has been provided.
- Please provide details of how the off-site habitat will be legally secured as a habitat bank
- If a S106 with SMDC is required to secure the off-site habitat, soil tests showing the soil is suitable to support other neutral grassland in moderate condition are required if the plan is to provide this habitat.
- Justification as to why the offsite provision is to be other neutral grassland - if the plan is to provide this habitat when it is between two woodlands and in a strategic area for woodlands.

- Confirmation is required that the development within 10m of the River Tean are temporary and will be restored within 2 years – only then can this be recorded onto the metric as not lost. Please clarify the rationale behind the extent of encroachment of both banks included in the BNG metric.
- Trees are shown on the baseline habitat plan but are not included in the metric calculation, please explain why. In addition, some of the hedgerows are mapped in the report as having trees (H5 and there appear to be additional trees mapped within H17 but in the key they are existing trees, not mapped as a hedgerow with trees – in the EclA H17 is listed as 'native hedgerow with trees' but there are no hedgerows with trees included in the baseline metric calculations. Please explain why.

Further detail

EIA

Figure 2 is missing from the updated report. Please provide this.

The cable route was surveyed in November 2024, this is considered a sub-optimal time of year to carry out a survey, in the report this was not considered a limitation and we accept the reasoning.

As per the EIA report:

- A badger walkover should be carried out no more than 2 months before the start of the works.
- There should be an Ecological Clerk of Works of all works by watercourses
- A District Level License should be obtained for the potential use of the site by Great Crested Newts.

Validity of EclA – 12 months from the date of the report 'If no action or development of the Site takes place within twelve months of the date of this report, then the findings of the assessment and supporting surveys should be reviewed. An update of the surveys and/or assessment may be required.'. Therefore if works haven't started before 31st October 2026, an update of the surveys and/or assessment will be required.

BNG

BNG metric and report and HMMP do not match for off-site habitat, some say creation of mixed scrub and unsealed surface, others show creation of other neutral grassland. The value of biodiversity units also does not match, between the BNG report and the metric for

on-site hedgerow units. The BNG report, metric and HMMPs should all relate to the same habitats in the baseline and being created. Please update as appropriate.

BNG Metric

If woodland is to be created in the offsite delivery area, the strategic significance will need to be updated in the metric as the area is in strategic and semi-strategic areas for woodland as per the netgainstaffs website.

Trees and Hedgerows with Trees

Trees are shown on the baseline habitat plan but are not included in the metric calculation, please explain why and update the metric if required. In addition, some of the hedgerows are mapped in the report as having trees (H5 and there appear to be additional trees mapped within H17 but in the key they are existing trees, not mapped as a hedgerow with trees – in the EcIA H17 is listed as ‘native hedgerow with trees’ but there are no hedgerows with trees included in the baseline metric calculations. Please explain why and update the metric if required.

Off-site delivery of BNG

Please provide details of how the off-site BNG will be legally secured and whether a S106 with SMDC will be required.

Any blue line boundary off-site BNG delivery will need to be registered as a habitat bank with Natural England. This will need to be legally secured either through a S106 with a LPA or a conservation covenant with a responsible body. If S106 will be needed to secure the monitoring of 30 years of management and monitoring after the development has finished, this will need to be agreed with the LPA prior to determination. This S106 agreement should either include the approval of the HMMP or this could be approved in a separate condition. The HMMP should include measures of success and remedial measures if things are not going to plan. We would need to see details of this to determine whether enough measures are in place to ensure that at least 10% BNG is delivered 30 years after development has finished.

In the BNG report, the off-site BNG proposes the delivery of other neutral grassland in moderate condition. As the baseline is modified grassland in poor condition, soil tests should be carried out to assess whether the soil is suitable to support other neutral grassland in moderate condition and whether remedial measures are needed to allow the creation of this habitat. If this is being registered as a habitat bank through someone other than SMDC, then it will be up to them to ensure that this is possible, however, if the applicants would like a S106 with SMDC, then we would expect to see the results of soil tests. Please justify why

other neutral grassland is proposed when the area is in strategic and semi-strategic areas for woodland as per the netgainstaffs website.

Offsite HMMP

Confirm whether this is for the correct habitat as the BNG report says other neutral grassland will be created.

Draft HMMPs

Please include target conditions and remedial measures for each of the monitoring report periods that the condition can be assessed against and trigger any remedial measures if required. Please provide further detail of what will be included in the monitoring reports – this has been partially addressed but does not include photographs or monitoring against specific targets set for each monitoring year.

At present the HMMPs just contain main condition assessments and these conditions will not be met in year 1, so targets should be set for each monitoring year and remedial measures for if targets are not met. This is partially done in the risk assessment but these do not contain measurable targets.

This is required to agree the monitoring schedule and set costs for the S106s securing the significant on-site and any off-site BNG.

Conditions

Pre-commencement

The ecologists reports state that no new lighting is planned for the site. If this changes an external sensitive nocturnal lighting strategy should be secured through a pre-commencement planning condition. The external nocturnal lighting strategy for both during and after construction should be designed in line with guidance from the [BCT on Bats and Artificial Lighting at Night](#). Lighting should include cowls / hoods or shields, operational timers and use a lighting spectrum ideally below 2700K. The strategy will identify features on site that are particularly sensitive for bats and that are likely to cause disturbance to their resting places, breeding sites and key areas for foraging and commuting and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that area to be lit will not disturb or prevent bats using their territory or having access to their breeding sites and resting places. All external lighting will be installed in accordance this the strategy and shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

A reasonable avoidance statement should be provided for amphibians, reptiles, badgers, dormice, bats and birds detailing Reasonable Avoidance Measures (RAMs) for these during

any further ground clearance works and construction and be included in the CEMP if applicable. This should include instructions detailing what should be done if a protected species is encountered and measures to avoid entrapment of mammals during construction works. This should be secured through a planning condition and a provision made for construction personnel sign to say that they have read, understood and will adhere to this.

A pre-commencement condition that a badger walkover should be carried out no more than 2 months before the start of the works.

A pre-commencement condition detailing the number, type and citing of bird boxes and bricks, bat boxes as detailed in the EclA along with installation instructions to be submitted to and agreed by the LPA Ecologist.

Details of the DLL agreement to be provided prior to the start of construction and evidence that this has been done provided.

HMMP

HMMP's have been provided for the on-site and off-site biodiversity enhancements. However, the on-site HMMP is missing specific management and monitoring information. The development shall not commence until a [Habitat Management and Monitoring Plan (the HMMP)], has been submitted to, and approved in writing by, the local planning authority. This should be prepared in accordance with the approved Biodiversity Gain Plan using the Natural England template or if the Natural England template is not used, the Natural England checklist 2.0 should be used to ensure all relevant information is included. HMMPs should include:

- a non-technical summary;
- the roles and responsibilities of the people or organisation(s) delivering the [HMMP];
- the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
- the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority,

LEMP

A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the Local Planning Authority prior to the commencement or of the development. The LEMP will be prepared for the operational Site that will cover how retained habitats and newly planted areas will be managed so as to maximise their biodiversity value and achieve the objectives of ecological mitigation and compensation.

The LEMP will also set out any measures necessary to ensure protected species are appropriately accommodated within the operational Site as detailed in the summary of assessment effects in the EclA.

This should cover aspects not included in the HMMP and ground preparation in advance of the HMMP being followed as well as:

- Description of creating appropriate ground conditions for the planned habitats
- Description and evaluation of features to be managed.
- Ecological trends and constraints on site that might influence management.
- Aims and objectives of management.
- Appropriate management options for achieving aims and objectives.
- Prescriptions for management actions.
- Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- Details of the body or organization responsible for implementation of the plan.
- Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

CEMP

No development shall take place until a Construction Environmental Management plan (CEMP) has been submitted to the local planning authority (LPA) this must include:

- Risk assessments of potentially damaging construction activities.
- Identification of biodiversity protection zones.
- Practical measures during construction to avoid or reduce impacts during construction (may be provided by method statements). This is to include all measures detailed in the EclA including those to protect nearby habitats and sites including woodlands and watercourses and species. Measures will include pollution prevention measures covering runoff, litter, chemical spillages, noise and lighting impacts through the construction-phase of the development. It should include the implementation of monitoring to be undertaken throughout the construction and operational phases of the development to ensure that the measures in place remain appropriate.

- RAMs for badgers, bats, amphibians, reptiles, otters, water voles, dormice and birds including all measures mentioned in the EclA.
- Invasive species method statements following further assessment and for Himalayan Balsam found in the MorPH survey.
- The location and timing of sensitive works to avoid harm to biodiversity.
- The times during construction works when specialist ecologists need to be present on site to oversee works.
- Responsible persons and lines of communication
- The role and responsibilities of an ecological clerk of works or similar competent person including for watercourses as detailed in the EclA.
- Use of protective fences, exclusion barriers and warning signs.
- Lighting used during construction should minimise impacts on wildlife – this is to be read and signed off by construction workers as part of the CEMP.
- Open excavations or pipes to be sealed at night. Ramps / planking to be installed to permit wildlife to escape being trapped in structures during construction.
- Pollution protection measures

As detailed in the EclA, the above points in the CEMP will detail how the habitats and species within and surrounding the Site will be protected during the construction phase. The CEMP will include details of appropriate fencing to restrict access into key ecological areas; information on any timing restrictions; and measures to prevent damage to sensitive ecological habitats and protected species. Creation of new wildlife features (such as bat and bird boxes) will also be included.

The CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with approved details, unless otherwise agreed in writing with the LPA.

Conditions

A planning condition to show six Schwegler 1B bird boxes (or similar) have been installed on mature trees within the retained hedgerows as per installation instructions.

A planning condition to show at least two Schwegler 2FN bat boxes (or a similar design) and a 1FS Large Colony bat box have been installed on retained mature trees within the existing hedgerows as per installation instructions.