

SWT Comments Land off Leek Road

Date: 18th March 2026

SMD/2025/0354

Erection of a 300 MW Battery Energy Storage System (BESS)

Land off Leek Road, Werrington, Staffordshire, ST9 0DQ

Site Area: 7.98ha (taken from Application Form)

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.

An application (Full Planning - Large scale MAJOR) is being sought for the construction of a Battery Energy Storage System (BESS) facility and substation with associated infrastructure on land off Leek Road, Werrington, Staffordshire, ST9 0DQ. The site is located within the Staffordshire Moorlands Green Belt.

We have viewed the following documents:

- The Preliminary Ecological Appraisal (PEA) Report (RPS Group, December 2024);
- Bat and Barn Owl Survey Report (RPS Group, July 2025);
- GCN eDNA Statement (RPS Group, dated 15 May 2025);
- The Biodiversity Net Gain Metric spreadsheet (RPS Group, date 10 July 2025);
- Site Layout Plan (Drawing Number LEEK-D-PL-INT-004, Revision 05, dated 05/08/25);
- Detailed Planting Plan, Sheets 1 – 3 (Drawing Number 250402-RAP-XX-XX-DR-L-4101, Revision P04, dated 25/07/25); and
- Conceptual Drainage Strategy (Document Number 00181-RPS-SD-ZZ-DR-D100-P03, dated 16/07/25).

SUMMARY – We recommend a **holding objection** until the following information is supplied and our comments are resolved.

Information/clarification is required on the following:

1. Updates to both the PEA report and Bat and Barn Owl Survey report to reflect the Proposed Site Boundary as presented in the Site Layout Plan – to ensure all necessary baseline data and potential impacts (both direct and indirect) are evaluated for the proposed scheme.
2. Review of losses of and/or impacts on trees, hedgerows, watercourses and other ecological features to fully reflect the proposals within the Detailed Planting Plan, and adjustment of ecological impact assessment and report(s) as required.
3. Further surveys of trees with high bat roost potential (PRF-M) that are proposed to be lost to development, as per current guidelines, or confirmation that all PRF-M trees will be retained and suitably protected.
4. Internal inspection of both buildings (B1 and G) for bat and barn owl usage is required, or clarification as to why this was not possible, to enable a full assessment of the potential of

these structures to support roosting bats (both summer and winter use), barn owl and nesting birds.

5. Further summer bat emergence surveys on Buildings B1 and G (classed as Low and Moderate potential for roosting bats, respectively), as per current guidance or clear justification as to why these detailed surveys are not required.
6. Justification of level of bat habitat assessment undertaken, with reference to current guidelines on habitat classification criteria Low, Moderate or High value, followed by an assessment of the potential impacts of the proposed scheme (including indirect impacts such as lighting).
7. A detailed badger survey is recommended, given there is evidence of badgers being present on/near site.
8. Update the Application Form so that BNG minimum validation requirements are met
9. We have insufficient information to determine whether the Biodiversity Gain Condition is capable of being discharged. This will need to be determined by the planning case officer when making their decision. Please provide the results of soil tests or detail on how suitable soil conditions for the proposed habitats will be achieved and a draft HMMP.

We also recommend that a pre-development condition referring to the preparation of a comprehensive Reasonable Avoidance Method Statement (RAMS) for all protected species potentially impacted by the construction phase is applied, should consent be granted.

Please note that we will submit a more detailed planning response including other biodiversity comments once the issues stated above have been resolved. This may include planning conditions.

We have viewed aerial photographs, the netgainstaffs website and information on DEFRA's MAGIC map to inform our response.

DESIGNATED WILDLIFE SITES AND PRIORITY HABITATS

We note that March Lane/Windycote Lane SBI is located approximately 500m to the east of the site and we agree with the assessment that it is unlikely that the SBI would be impacted either directly or indirectly by the proposals, due to distance from the site and lack of direct habitat connectivity. The assessment should, however, also consider the cumulative impact on this designated site.

There are no other statutory or non-statutory designated sites, Ancient Woodlands or Priority Habitats (other than on site Hedgerows – see below) within or adjacent to the proposed development.

HABITATS

We have reviewed the Preliminary Ecological Appraisal (PEA) Report prepared by RPS Group (December 2024) and note that habitat survey (5th August 2024) was undertaken at an appropriate time of year for the habitats included.

The Site Boundary presented in the PEA report does not match the Proposed Site Boundary provided in the Site Layout Plan, with some areas within the Proposed Site Boundary missing from the PEA survey area. The baseline UK Habitat (UKHab) map and potential impacts on habitats/features within the Proposed Site Boundary are, therefore, not clear/incomplete. This also results in confusion in

terms of understanding how the BNG Metric relates to the PEA report's UKHab Map (Figure 1) – as reiterated under the BNG assessment section.

It is unclear which trees and hedgerows are to be lost or otherwise impacted by the proposals. For example, the Detailed Planting Plan shows a section of hedgerow H8 with trees (possibly including trees identified as holding PRF for bats) being lost to development, however this is not identified/assessed in the conclusions of the report(s). Furthermore, T3 and T4 (the latter being identified as a PRF tree for bats) appear to be lost, but this is not specifically addressed in the assessment/report(s).

It is unclear how the ditch on site and the stream adjacent to site will be impacted. For example, the Detailed Landscape Plan suggests a series of outfalls and swales, including an outfall to the stream. Furthermore, the proposed temporary construction access track appears to cross a wet ditch adjacent to hedgerow H8, but this is not addressed in the evaluation. On the Site Layout Plan the section of the 'temporary construction access track' looks to become a permanent 'emergency access track' and it is not clear how this is captured in the ecological impact assessment.

We welcome the retention of the majority of trees, hedgerows and watercourse features within the proposals. There is, however, no indication how (broadly speaking) these retained features will be protected to confirm this approach is feasible within the proposed layout.

PROTECTED SPECIES

As outlined in PEA report, the site has the potential to support a range of protected species and we welcome the bat and barn owl surveys and great crested newt (GCN) eDNA assessment completed as part of the assessment.

The eDNA analysis confirms no GCN were detected within the nearby pond.

The Site Boundary presented in the Bat and Barn Owl Survey report does not align with the Proposed Site Boundary presented in the Site Layout Plan, with some areas being omitted from this assessment, including what appears to be a mature tree along the northern boundary. This should be amended to ensure the assessment include all features of interest for bats and birds.

Two Buildings (B1 and G) were assessed for potential for bat and barn owl usage.

Paragraphs 2.1.2 of the survey report indicates the exterior only of the buildings was inspected, with no internal inspections completed. This internal inspection should be completed or, if not possible, justification as to why this omission occurred and this potentially significant constraint accounted for in the recommendations provided.

Both Buildings were identified as holding some potential for roosting bats (B1 = Low, G – Moderate). However, neither further recommendations for summer bat emergence surveys nor justification for not undertaking such surveys is given in the report's conclusions.

The report does not present how the proposed scheme impacts upon each tree with FAR, PRF-I or PRF-M status in relation to roosting bat. This should be clearly presented in the report and all trees captured by the Site Layout Plan boundary should be included.

All PRF-M trees should be subject to further inspections (close aerial inspection or summer emergence surveys) to rule out the presence of roosting bats, unless a clear justification for not undertaking such detailed surveys is provided.

Justification as to why PRF-FAR trees could not be assigned a PRF-I or PRF-M status should be given, and if necessary PRF-FAR trees may need to be precautionarily assigned PRF-M status and assessed accordingly.

Potential impacts on bat foraging and commuting habitat is not fully assessed, including for example any proposed lighting schemes, and an assessment using current guidance should be completed.

We note that a range of other protected species have the potential to be present and details of measures to avoid disturbance or harm to these species should be secured by condition.

BIODIVERSITY NET GAIN

Minimum Validation Requirements

This application does not meet the following minimum validation requirements as stipulated in the [Biodiversity Net Gain Planning Practice Guidance](#):

- The date of the pre-development value incorrect, it should be either the date of the application or an earlier proposed date as agreed between the LPA and the person writing the net gain plan. If the date is earlier than the application date, evidence for the agreement of this date between the local authority and the individual who will be writing the Biodiversity Gain Plan should be provided. Alternatively use the application date.

BNG Metric and Baseline

A completed Statutory Metric (dated August 2024) has been provided including baseline and proposed habitats/landscape features. There is insufficient information and some uncertainty around the calculation of the baseline units which should be clarified before the Biodiversity Gain Condition can be applied.

Some points of clarification/further information on the BNG baseline are as follows:

- As noted above, the UKHab map (Figure 1 of the PEA report) presenting the baseline habitats and features does not align with the Site Layout Plan, with areas omitted from the UKHab map. The baseline survey area appears to be incomplete.
- Detailed baseline Condition Assessment information (including River Condition Assessment data) is missing for most habitats and features within the baseline, with the exception of hedgerows.
- No habitat reference numbers are included in the Metric, meaning cross-reference to the UKHab map cannot be undertaken and baseline areas cannot be confirmed.

- It is not clear if any losses of trees within hedges have been appropriately accounted for.
- The impact(s) on ditches and the stream is not clearly presented in the baseline information (watercourse and riparian encroachment).
- The presence of bramble scrub as mapped in the UKHab map is not presented in the baseline information and it is unclear why.
- Six Line of Tree features are included in the PEA report, however, only two are presented in the baseline dataset for BNG and it is unclear why these features are omitted.
- Numbers of individual trees within the baseline is not clearly presented, and losses of trees is unclear.
- Looking at the netgainstaffs map, some of the site is in a semi strategic area for woodland and watercourses, the metric should be updated to reflect this for the relevant parts of the site and these habitats.

We also note that the post-development calculation for proposed newly planted individual trees records the trees as Medium size (DBH of 31 – 60cm). Tree size categories for new tree planting must be assessed as the size at time of planting. The largest tree size proposed for planting is 'extra heavy standard' at a circumference of 14 – 16cm, which equates to a DBH of <30cm so all proposed individual trees should be classed as Small size category. Tree numbers proposed for planting also appears to vary across various documents and this should be reviewed for the BGP submission.

As individual tree losses and gains have considerable weight in the Statutory Metric, we would strongly recommend this post-development information is reviewed and amended at this stage to assist in the understanding of the likely net gain achieved on the site.

We note that wildflower planting is proposed. This will require nutrient poor soils. Please either provide the results of soil tests showing that the soils are appropriate for this or provide details of how suitable soils will be provided to achieve other neutral grassland in moderate condition.

The proposals include significant on-site BNG. Significant on-site gain will need to be secured through a S106 which needs to be finalised at the time a planning decision is made. To do this we would require details of what is proposed, whether it is feasible and a draft HMMP to show that the desired habitats and conditions are achievable and also to set monitoring of management and monitoring costs. We would expect the draft HMMP to include everything set out in the Natural England template along with specific targets for each monitoring year and remedial measures for if things are not going to plan.

The presence of Himalayan Balsam requires the production of an invasive species management plan if works are within 15m of this species which should be included in the CEMP.

Please note that we may wish to make additional comments and will suggest conditions upon receipt of the requested information in due course.