

SWT Comments New Buildings Farm

Date: 20th March 2026

SMD/2025/0388

Solar farm with ancillary infrastructure, security fence, access, landscaping and designed to allow continued agriculture

New Buildings Farm, Sandon Road, Sharpley Heath, Stone, Staffordshire, ST15 8SL

Site Area: 102.50ha (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 solar farm with ancillary infrastructure, security fence, access, landscaping and designed to allow continued agriculture at New Buildings Farm, Sandon Road, Sharpley Heath, Stone, Staffordshire, ST15 8SL (hereafter referred to as the 'site').

Part of the site falls within East Staffordshire Borough Council and any comments made by this Local Authority should be read alongside this information.

We have viewed the following documents:

- The Preliminary Ecological Appraisal (PEA) Report (Enzygo, dated 16th August 2023);
- [REDACTED]
- Great Crested Newt (GCN, *Triturus cristatus*) Environmental DNA (eDNA) results for ponds P1 and P2 (SureScreen Scientifics, dated May 2023);
- The Biodiversity Net Gain (BNG) Metric spreadsheet (Enzygo, dated 20th December 2024);
- BNG Statement (Enzygo, dated 18th September 2025);
- Location Plan (Drawing Number 1115 01, Revision 06, dated 3rd June 2025);
- Preliminary Layout Plan (Drawing Number 1115 02, Revision 09, dated 25th January 2024);
- Detailed Landscape Design, Sheets 1 to 10 (Drawing Number LB404_D01, Revision A, dated 15th November 2024); and
- Arboricultural Appraisal (Salopian Consultancy, dated October 2024).

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 the ecology assessment and BNG baseline to reflect the Application Site Boundary as presented in the Location Plan – to ensure all necessary baseline data and potential impacts (both direct and indirect) are evaluated for the proposed scheme. Ensure the hectarages align across all documents;
2. Justification for the very early season (January 2023) habitat survey and additional information of method and results for habitat Condition Assessments as required for baseline BNG;
3. Surveys are out of date and will need repeating;

4. Review of losses of and/or impacts on trees, hedgerows, ponds, 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. Further information is given under the Habitats section of this letter;
5. Further surveys of trees to identify Potential Roost Features (PRF) for bats and evaluation of the potential (direct and indirect) impact of the proposed scheme, with compensation/mitigation measures as appropriate. A number of trees are noted as impacted in the Arboricultural Survey Report;
6. Clarification of whether Himalayan/Indian balsam (*Impatiens glandulifera*) is present on/near to site and if so assessment of potential impacts during the construction phase.
7. Justification of the 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 and compensation/mitigation measures as appropriate. The adjacent Ancient Woodland block should be included in any habitat assessment for bat use of the site as such habitats can support a range of bat species;
8. Further detailed information on how the 'no significant impact' assessment has been reached for ground nesting birds (skylark (*Alauda arvensis*) and lapwing (*Vanellus vanellus*)) should be provided and/or a suitable compensation approach for loss of breeding territories supplied to offset predicted impacts;
9. An ecological impact assessment of all watercourses (streams and ditches) on or close to the site should be undertaken, including but not necessarily limited to a River Condition Assessment (RCA). Presentation of any compensation/mitigation requirements to be included;
10. Watercourses mapped as Statutory Main Rivers should have at least 10m wide buffer zone;
11. Review of the buffer zone around the Ancient Woodland to ensure it consistently meets the minimum 15m width from canopy edge; and
12. We have insufficient information to determine whether the Biodiversity Gain Condition is capable of being discharged. Please see the information in main body of this letter for details. This will need to be determined by the planning case officer when making their decision.
13. Minimum validation requirements for BNG are not met.

A number of planning conditions are also required, as detailed in our response below.

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 additional/updated planning conditions.

We have viewed aerial photographs and information on the Defra Multi Agency Geographic Information for the Countryside (MAGIC) map to inform our response.

PRELIMINARY ECOLOGICAL APPRAISAL

This is dated August 2023, the habitat survey was carried out On 26/01/2023. As per the CIEEM advice note on the lifespan of ecological reports and surveys, the surveys will need repeating. CIEEM advice note states 'A professional ecologist will need to undertake a site visit and may also need to update

desk study information (effectively updating the Preliminary Ecological Appraisal) and then review the validity of the report, based on the factors listed below. Some or all of the other ecological surveys may need to be updated. The professional ecologist will need to issue a clear statement, with appropriate justification, on:

- *The validity of the report;*
- *Which, if any, of the surveys need to be updated; and*
- *The appropriate scope, timing and methods for the update survey(s).'*

DESIGNATED WILDLIFE SITES AND PRIORITY HABITATS

Bromley Wood is adjacent to the application site and is noted as an Ancient Semi-Natural Woodland, Priority Woodland, Local Wildlife Site (LWS) and is subject to a Tree Preservation Order. The PEA report recommends a minimum 15m buffer around this protected site to minimise impacts from the proposed scheme, which is welcomed. However, this recommended depth of buffer appears to have been inconsistently applied on the Preliminary Layout drawing. This should be reviewed and the ecological assessment updated as required. The assessment should also consider the likely cumulative impact on this designated site.

HABITATS

We have reviewed the PEA report and note that habitat survey (January 2023) was undertaken at a time that is likely to be inappropriate for the habitats on site and for the collection of accurate baseline data for the BNG assessment. The Limitations sections of the report notes the significant impact of this date on plant species data collection and indicates ‘further surveys’ were completed to account for this. Full details of these further surveys should be presented.

The Site Boundary presented in the PEA report does not match the Site Boundary provided in the Location Plan, with some areas missing from the PEA survey area. The baseline UK Habitat (UKHab) map and potential impacts on habitats/features within the Site Boundary are, therefore, not clear/potentially incomplete. There is also a difference in the site hectareage reported between Application Form and the ecology documents. Any updates to the site boundary should be reflected in both habitat and species impact assessments.

We welcome the retention of the majority of trees/tree lines, hedgerows and watercourse features within the proposals. However some points of clarification have arisen, as follows:

There are no individual trees mapped on the UKHab map, however, the Detailed Landscape Design plans suggest they are present. For example, there appear to be individual trees with no associated hedge feature mapped in Fields 1, 4 and 19. The approach taken to mapping trees as a Line of Trees feature as opposed to Individual Tree features should be clarified and trees more appropriately mapped as Individual Trees added to the UKHab map (this distinction is also important for baseline BNG – see page 60 of the Metric User Manual). This evaluation should be provided.

Hedgerows should be individually labelled and assessed to ensure any impacts and proposed enhancements can be understood for each individual hedgerow feature (this is also important for the

assessment of the baseline BNG – see page 60 of the Metric User Manual). For example, hedgerows are mapped along the top of Fields 21 and 22 but do not appear as retained features on the Detailed Landscape Design (although trees are shown). This evaluation should be provided.

It is unclear how watercourses on or adjacent to site will be impacted and the recommended buffer zones are not clearly shown on the Detailed Landscape Design. In addition, a drain is noted on the northern edge of Field 12 on the Detailed Landscape Design plans, but it is not included in the habitat map (or baseline BNG) and watercourses that run along hedgerows between Field 1 and 6, and also along Fields 4, 6 and 9 do not appear on the UKHab map. It is unclear what the status of these features is and how they have been assessed (including for baseline BNG). The assessment should detail all watercourses and ditches and provide information on how these features are impacted by the scheme. Where a watercourse is mapped as a Statutory Main River it is recommended there is a 10m wide buffer as a minimum, rather than a minimum of 5m. The PEA report identifies the need for additional survey and assessment in relation to the proposed construction of bridges and/or outfalls and any bank engineering works. Any watercourse assessments that do not relate to baseline BNG assessments can be secured through a suitably worded planning condition in due course.

Ponds appear to be fed by surface water catchment inputs as opposed to watercourse inputs. There is no assessment of how changes in the catchment may impact upon the water supply to these ponds (i.e. whether the ponds will still receive sufficient water to maintain Priority status and support the expected range of habitats and species over the long-term). This evaluation should be provided.

PROTECTED SPECIES

As outlined in PEA report, the site has the potential to support a range of protected species and we welcome the provision of additional [REDACTED] survey, breeding bird survey and GCN eDNA/Habitat Suitability Index (HSI) assessments.

We note the Site Boundary presented in the PEA report does not match the Site Boundary provided in the Location Plan, with some areas missing from the PEA survey area. This should be amended to ensure the assessment includes all features of interest for protected and/or notable species (and is also important for the baseline BNG assessment).

The ecology information provided does not present a detailed assessment of trees for their PRF status for bats or clearly justify why Ground Level Tree Assessments have not been undertaken. It is likely that at least some trees will have PRF given the number on/adjacent to the site. The Arboricultural Report indicates a number of trees are impacted by the proposals, and this information should be used to identify potential impacts on PRF. This evaluation should be provided.

The PEA report does not present a detailed assessment of the value of the habitat for commuting or foraging bats or clearly justify why this has not been undertaken. The habitat looks likely to meet at least Medium value according to current guidelines and loss of foraging habitat and/or severance of flightlines may be a significant issue. The presence of adjacent Ancient Woodland should also be considered in terms of bat habitat impacts, as these habitats can support important bat populations (the potential presence of PRF on trees in the woodland is mentioned in the PEA report). This evaluation should be provided.

[REDACTED]

The PEA report provides a comprehensive breeding bird survey that confirms the site and immediate surrounding habitat supports a range of bird species and is assessed as being of District importance for breeding birds. We agree that the proposed scheme retains many habitats that will be used by nesting birds, such as trees/hedgerows and ponds/watercourses and this is welcomed. Measures to protect nesting birds are provided in the report and these should form part of the RAMS/CEMP documentation.

Surveys also identified three potential skylark and two potential lapwing breeding territories on site (the latter species confined to fields in the south-east) and the evaluation concludes that *'works will not lead to any significant loss of habitat impacting this species at a local level'*. We consider that these territories will be lost to the proposed development and it is highly unlikely that these breeding territories will be retained on site. The assessment suggests there is *'an abundance of suitable habitat'* in the surrounding area and it is implied that either the breeding pairs on the site will move to alternative habitat and/or the loss of this number of breeding pairs will not significantly impact on the local populations. However, no data/evidence are provided to support this assessment. These species typically nest in open fields, away from tall vegetation and boundary habitats, and require long unbroken sight lines. The majority of breeding activity would likely be displaced from areas proposed for solar panels, as these structures will obstruct sightlines. Furthermore, cumulative impact assessments are not provided.

Populations of both species are reported to be in decline, lapwing especially so (the British Trust for Ornithology (BTO) report a 63% decline from 1967 to 2023) and the classification of these species as both High Conservation Concern and Species of Principal Importance reflects this. We consider that off-site compensation is appropriate for both these species of ground nesting birds, preferable on habitat adjacent to the existing territories. A suitable compensation approach should be prepared or further detailed evidence of how the assessment of *'no significant impact'* has been reached for each species.

The HSI indicated two on site ponds have Good suitability for GCN, however, eDNA analysis confirms GCN were not detected within the ponds. We note the PEA report assesses the site in the context of the Staffordshire Moorland District Council GCN Impact Risk Zone map and that the site is largely within a Green Zone (GCN may be present) with no higher risk zones present. The precautionary approach to site clearance as recommended in the report is considered proportionate. The ponds also support suitable habitat for commoner amphibians. The site may support small numbers of the commoner reptile species and brown hare (*Lepus europaeus*). Recommendations for the use of RAMS to avoid impacts on these species is appropriate and proportionate. This should include hedgehog

(*Erinaceus europaeus*), which is likely to be present on parts of the site and may be impacted by site clearance. Other protected species may also need to be included once further assessment as outlined above is completed (for example, bats, otter (*Lutra lutra*), water vole (*Arvicola amphibius*) and white-clawed crayfish (*Austropotamobius pallipes*)). The requirement for RAMS can be secured by planning condition in due course.

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN (CEMP)

A CEMP is recommended in the PEA report to manage potential pollution and run-off during construction. The required RAMS for all protected and Priority species present/potentially present on site and the retained habitats, as detailed in the ecology documentation and any later updates, should also be included in the CEMP. The CEMP should include provision for an Ecological Clerk of Works (ECOW) throughout the construction phase. The preparation of the CEMP can be secured by planning condition in due course.

SENSITIVE LIGHTING SCHEME

We welcome the proposed sensitive lighting scheme as recommended in the PEA report. This should include details of the location, design and lux levels of lighting to be used during the construction and operational phases of development, to minimise disturbance to retained habitats and associated wildlife, in particular foraging bats. The lighting scheme can be secured by planning condition in due course.

BIODIVERSITY ENHANCEMENTS

The Detailed Landscape Design plans provided with the application present locations and specifications on the proposed landscaping. The inclusion of a range of native and semi-natural habitats and use of appropriate planting/seeding mixes is welcomed. There are some apparent inconsistencies between the ecology documentation and these plans (as detailed above), and this should be reviewed and aligned to ensure all documents align. Adjustments to the design may need to be made to ensure all necessary ecological protection and mitigation/compensation measures are presented within the plans, particularly where updated ecological information is collected and/or additional ecological evaluation is undertaken.

We note that a Landscape and Ecological Management Plan (LEMP) will be produced to ensure the continued appropriate management and monitoring of ecological features. This document should cover the full period of the scheme's operational phase and include details of how the site will be maintained and managed during and after decommissioning and refer closely to current guidance (e.g. *Natural Capital Best Practice Guidance: Increasing biodiversity at all stages of a solar farm's lifecycle*, Solar Energy UK). The document should also align with the documentation required under the Biodiversity Gain Condition. The preparation of the LEMP can be secured by planning condition in due course.

We note and welcome the inclusion of hibernaculum along with bird and bat boxes (as shown on the Detailed Landscape Plans) and suggest that a plan showing the number, location and specification of

bird and bat boxes to be installed is secured by planning condition (in due course) and illustrated in the LEMP.

APPLICATION FORM

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.
- The site area on the application form is 102.5ha; the area on the BNG metric is 82.10ha – BNG should be calculated for the whole site – please update the incorrect document.

BIODIVERSITY NET GAIN

A completed Statutory Metric (dated 20th December 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, 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 Location Plan, with areas omitted from the UKHab map. The baseline survey area appears to be incomplete;
- Baseline Condition Assessment forms (including RCA data) are missing and may have been affected by early season survey (specific date of Condition Assessment surveys is not provided);
- No habitat reference numbers are included in the Metric, meaning cross-reference to the UKHab map cannot be undertaken and baseline areas/lengths cannot be confirmed;
- Hedgerows and Lines of Trees should be presented as individual features, one feature per Metric row and losses/enhancements clearly presented for each feature;
- It is not clear if any losses of/impacts on individual trees (including within hedgerows) have been appropriately accounted for. We note that the Arboricultural Survey Report indicates that some trees are impacted by the proposals (including significant impacts to Root Protection Area) and this impact on tree loss or reduced condition is not clearly shown. This should be reviewed;
- The baseline watercourse tab is omitted from the Metric and should be included/completed as there are watercourses, including Statutory Main Rivers on/near to the site. RCA is likely required and impacts such as bridge crossing, bank engineering works and/or outfall construction should be accounted for within the encroachment sections; and

- Given the proposed buffer zones around the watercourses, the Metric may need to include 'Watercourse footprint' within the baseline habitats tab. This should be reviewed.

Please note that there is increasing evidence that the detailed design of solar farms (such as solar panel spacings, height above ground level) are important factors to consider when assessing post-development grassland type and condition. We would expect these factors to be given due consideration within the Biodiversity Gain Plan should the scheme be consented and subject to the Biodiversity Gain Condition.

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

Regards,

Dated 12th March 2026