

To:	Dylan Campbell (Masdar)
Cc:	Alex Inglis (Masdar), James Graham (Masdar), Camilla Fisher (Tetra Tech)
From:	Jo Atkinson
Date:	13 July 2026
Subject	SMD/2025/0354 - Leek Road BESS, Ecology issues

Tetra Tech Consulting Limited ('Tetra Tech') has prepared this technical memo on behalf of Masdar Arlington Energy to summarise the key issues raised by Staffordshire Wildlife Trust (SWT) in its response to the application to Staffordshire Moorland District Council (SMDC) dated 18th March 2026, and to set out how they will be addressed.

The table below presents the key issues log, which includes the comments from SWT and a response from Tetra Tech ecology, along with the further information to be provided where appropriate to assist SMDC in its decision-making in respect of the application.

Tetra Tech Leeds, 3 Sovereign Square, Sovereign Street, Leeds, United Kingdom, LS1 4ER

Tel 07763 208583 **Email** jo.atkinson@tetratech.com

Tetra Tech Consulting Limited. Registered in England: No.01470149
Registered Office: 101 Park Drive, Milton Park,
Abingdon, Oxfordshire, England, OX14 4RY

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SWT Comment	Key issue to be addressed	Tetra Tech comments	Further information to be submitted to SMDC
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	Inconsistencies between ecology documents and other planning documents submitted. Lack of clarity on impacts to protected species.	Mapping to be updated in PEA report and bat and barn owl survey reports. An ecological impact assessment (EcIA) will be prepared to assess clarify impacts to habitats/ protected species and to set out avoidance, mitigation and compensation as necessary.	Updated PEA report. Updated bat and barn owl report. EcIA report.
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.	Lack of clarity on BNG assessment.	BNG assessment to be updated as per various comments (see below).	Updated BNG report.
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.	Site boundary and post-development layout in BNG report inconsistent with other planning documents submitted.	BNG report to be updated with appropriate planning application boundary and post-development layout.	Updated BNG report.

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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.	Lack of sufficient baseline evidence within BNG report.	The habitat condition assessment sheets are already included as Appendix B in the BNG report – we assume that SWT are asking for further habitat information against each habitat type to evidence the conditions assigned. The raw data for river condition assessments is over various pages so doesn't tend to be included in BNG reports, but this can be added.	River Corridor Assessment data to be included as an appendix in the updated BNG report. Further habitat condition assessment information to be included in an updated version of Appendix B of the BNG report.
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.		This is not a standard requirement for BNG reports – we are unclear what SWT is requesting here. The baseline habitats have been mapped and then the areas entered into the BNG metric calculator tool (habitats of the same type and condition have been grouped together in the metric calculator tool for simplicity).	Suggest no further work to be undertaken here.
It is not clear if any losses of trees within hedges have been appropriately accounted for.		This is included as part of the linear calculation for hedgerows (based on the hedgerow types entered into the metric, which includes the 'native hedgerow with trees' hedgerow type). These are then accounted for in the metric calculator tool as a linear habitat type, rather than as individual trees within the hedgerow.	No updates to BNG report to be undertaken in respect of this comment. Clarification in EcIA to be provided regarding impacts to individual trees (including hedgerow trees).

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The impact(s) on ditches and the stream is not clearly presented in the baseline information (watercourse and riparian encroachment).	Lack of clarity on assumptions in BNG report.	Assumptions on watercourse and riparian encroachment to be included in updated BNG report.	Updated BNG report.
The presence of bramble scrub as mapped in the UKHab map is not presented in the baseline information and it is unclear why.		This forms part of the hedge/scattered scrub habitat type so has not been included in the baseline.	No further information to be provided.
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.		These habitat features have been grouped in the metric based on condition and there were only two different condition scores.	No further information to be provided.
Numbers of individual trees within the baseline is not clearly presented, and losses of trees is unclear.	Impacts to trees.	'Individual trees' has been entered into the metric calculator as a separate line item (line 6); the metric calculates an area for this habitat type based on the DBHs.	Clarification in EcIA to be provided regarding impacts on individual trees.
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.	Review Staffordshire and Stoke-on-Trent Local Nature Recovery Strategy.	This would not change the baseline BNG unit value but may be applicable to the Strategic Significance of some of the post-development interventions. This would be reviewed in the updated BNG report. The Strategic Significance scores for post-development interventions will be reviewed against the Staffordshire and Stoke-on-Trent draft Local Nature Recovery Strategy (LNRS) in the updated BNG report and amended as appropriate.	Updated BNG report.

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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.	Clarity on bat surveys undertaken, and evidence to support scoping out of further surveys where appropriate.	All PRF-M trees will be retained and suitably protected.	Updated bat and barn owl survey report. Clarification in EclA to be provided regarding potential impacts to bats and their habitats.
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.	Clarity on bat surveys undertaken, and evidence to support scoping out of further surveys where appropriate.	Building B1 is a commercial building within the operational haulage yard and is not suitable for barn owl. A PRF assessment concluded that it had low potential for roosting bats. Building G is a small agricultural building that was assessed as having moderate potential for roosting bats. An internal inspection of the building was undertaken by a licensed barn owl surveyor in summer 2025 and no evidence of barn owl nesting or roosting was observed.	Updated bat and barn owl survey report.
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.	Clarity on bat surveys undertaken, and evidence to support scoping out of further surveys where appropriate.	No further surveys are necessary because the buildings will not be directly impacted by the development. Justification for scoping out further surveys to be included in updated bat survey report. A precautionary working method statement (PWMS) has been recommended during the construction phase to minimise the risk of disturbance to building G.	Updated bat and barn owl survey report.
Justification of level of bat habitat assessment undertaken, with reference to current guidelines on	Lack of bat activity surveys.	Clarification will be provided regarding the bat habitat assessment.	Bat activity survey report. Impacts on bats to be assessed in EclA report.

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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).	Assessment of impacts to bats.	Bat activity surveys are in the process of being undertaken; these commenced in May 2026 and comprise a combination of seasonal walked transects and monthly static detector deployments. Results to date indicate low usage by mainly common species of bats (passes dominated by common pipistrelle).	
A detailed badger survey is recommended, given there is evidence of badgers being present on/near site.	Assessment of impacts to badgers.	All works will be >30 m from any active badger setts. However, an updated walkover to clarify the location and status of any setts will be undertaken in summer 2026. The PEA report recommended that a pre-construction badger presence/absence survey be completed to confirm the current status of badger activity on site. This could be secured with an appropriately worded planning condition.	Updated information on badger setts to be included in EcIA report (along with any required mitigation, if needed).
Update the Application Form so that BNG minimum validation requirements are met.			To be informed by updated BNG report.
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	BNG assessment insufficient.	We don't believe soil testing is necessary in this instance, as we are only proposing the establishment of moderate condition neutral grassland. The specified seed mix should reliably achieve the required condition across a wide range of soil types, making soil testing less critical than it would be for more sensitive habitats, such as calcareous grassland. Similarly, the provision of an HMMP can be secured by an appropriately worded planning condition. Given	Updated BNG report.

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for the proposed habitats will be achieved and a draft HMMP.		the limited post-development interventions, the habitat creation and enhancement proposals would be readily achievable on this site.	

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