

BESSEEL830 – Battery Energy Storage System and associated works at Land West of Buxton Road, Dove Holes, Buxton - Addendum

Ellendale Environmental Limited was commissioned by Grenergy to undertake a Preliminary Ecological Assessment (PEA) for land at Buxton Road, Wormhill, Dove Holes, High Peak, Derbyshire, SK17 7HR ('the site'). The scheme been undertaken in support of a planning application (ref. HPK/2024/0467) for the proposed to develop a BESS at the site which is approximately 1.5 hectares in size ('the proposed development'). Surveys undertaken at the site as part of the PEA included an Extended Phase 1 Habitat survey and a preliminary protected species walkover.

This addendum has been written to address comments received from Derbyshire Wildlife Trust, with regards to planning application HPK/2024/0467 received via e-mail on the 10th February 2025. This addendum relates to comments on Protected and Priority Species, Designated Sites, Priority Habitats, Important Ecological Features.

Comments received and responses are below;

1] Habitats and Species: No consultation was carried out with Derbyshire Biological Records Centre (DBRC) to inform the ecological assessment. Guidance provided by CIEEM advises that Local Record Centres are included within desk studies to contextualise the application site, inform requirements for further surveys and aid the assessment of impacts. Due to the absence of a data consultation, nearby Local Wildlife Sites (LWSs) have been omitted from the impact assessment and local records of protected and notable species have not been fully considered. A data consultation should be carried out and the report updated.

DBRC have been consulted and the PEA updated with local records within 2km of the site including LWSs which have been obtained through a data search from DBRC.

2] There are numerous records of ground nesting birds in the locality (particularly associated with a nearby LWS) and whilst there are factors that reduce the suitability of the application area, including livestock grazing and the northern woodland, there is potential for use by species such as curlew, snipe and meadow pipit, all of which are present locally.

Farmland birds may utilise this habitat, it is recommended that site works for the development of the site is undertaken out with the breeding bird season (March – August, inclusive), as all nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended). If works are undertaken within this period, a nesting bird survey would be

required no more than 24 hours prior to the works. If nesting birds were found, these areas of the site would need to be protected from disturbance until the young have fledged naturally.

The created grasslands will be cut every two years avoiding the bird breeding season to allow tussocks to develop and insect populations to increase. These areas will be cut in rotation to ensure plenty of uncut margins each year that provide a source of seed as winter food for species such as linnet and, provides a dense sward structure, suitable as nesting habitat. Some of the grassland arisings from management works should be stacked nearby and left as a food source

3] In an attempt to be proportionate, we query whether it would be possible to take precautions during works to reduce the risks to reptiles and avoid the need for survey. For example, if areas in the west could be retained and reduce the extent of impacts, if the field could be maintained as grazed / short sward prior to works and if the initial clearance could be supervised by an ecologist. If suitable, measures such as these could be secured through a CEMP: Biodiversity, along with measures to protect nesting birds including clearance outside the breeding season.

A reptile survey and assessment has been undertaken for the site¹ in which outline mitigation was recommended. This can be further enhanced in a CEMP and it is recommended that this is conditioned as part of the planning permission for the site.

4] The proposed lighting comprises 9No. 4m light fixtures. It is to be used as security lighting only, operating with motion sensors with a duration no longer than 3 minutes. Whilst the use of motion sensors is welcomed, we note that the Lighting Assessment does not refer to Guidance Note 08/23 - Bats and Artificial Lighting at Night (BCT and ILP, 2023). It is essential that lightspill is avoided to adjacent habitat which could be used by local wildlife. A rail line runs to the west of the site, which could provide a wildlife corridor. Lightspill to the rail line is less than 0.2 lux and therefore no impacts are anticipated. Lightspill does however encroach onto the woodland adjacent to the northern boundary, with levels of ≥ 2 lux calculated. Additional measures should be implemented to reduce backwards spill to the woodland edge. This may include using a different light fixture or the additional of features such as shields. The colour temperature of the chosen luminaire is 3000k, however the previously mentioned guidance note advises the use of 2700k or lower to reduce impacts to bats. We advise that the ecologists and lighting engineers should liaise to design the best possible design for the scheme.

¹ EEL830R241002EA Buxton Road Buxton Reptile Survey and Assessment Report CIC v1.0

An updated Environmental Lighting Impact Assessment Report has been produced, showing that the light spill into the closest woodland area is negligible, therefore it will not affect the species utilising this habitat. Compliance with the lighting strategy will allow a sensitive lighting installations while reducing the potential for obstructive lighting.

5] *BNG: No summary of the baseline habitat assessment is included in the report and existing habitats have only been reported in terms of Phase 1 terminology so far and not UKHabs. Condition assessments are not provided.*

Will supply UKHabs plan alongside updated BNG and Condition assessment.

6] *It is not currently known if all onsite habitat will be lost and re-created or if some will be retained and enhanced. The existing grassland is of value and should be retained where possible, not just destroyed and resown i.e. in the west of the site. The mitigation and BNG hierarchies should be evidenced in the assessment.*

The grassland habitat within the site will be retained and enhanced with additional seeding as required. Additional woodland planting and rural trees will enhance the site also.