



Directorate for Planning, Growth & Sustainability

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For Ecology Planning Application Response

Date: 29 November 2024

From: Paul Holton, Ecology Officer and
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Application reference:	23/03875/APP
Site:	Rookery Farm Granborough Buckinghamshire MK18 3NJ
Proposal:	Development of a battery energy storage system (BESS), connected directly to the national Grid with associated infrastructure including access, drainage and landscaping

Summary

Evidence of the GCN district licence is to be provided for the LPA to review. Once this has been provided it is recommended to consult and refer to the Newt Officer comments.

Once the above information has been provided it is recommended to secure the following conditions:

- LEMP
- CEMP

Discussion

Further correspondences has occurred for this proposed development. Please see below updated comments in relation to ecological matters.

Works

Temporary work area

Further clarification has been provided.

Geo-style matts (or similar) will form the temporary road construction along with two bridges spanning over the width of the banks, to avoid impacts to the watercourse banks. These features are proposed to be erected and removed within two years and therefore does not require BNG. Some gaps through existing hedgerows will be required for the temporary works however these will be inspected prior to removal and replanted with appropriate native species.

Temporary works can be secured via Construction Environmental Management Plan - Biodiversity. (CEMP). The proposed landscaping can be secured via the Landscape & Ecological Management Plan (LEMP).

Protected species

Reptiles

Mitigation and compensation measures can be secured via CEMP.

Breeding and Overwintering birds

Mitigation and compensation measures in accordance with the wintering bird survey report (MKA, July 2024) and preliminary ecological appraisal (MKA, October 2023) can be secured via CEMP and LEMP. This includes detailing the Skylark measures as identified within the 'provision for skylark' plan (November 2024). The details of these Skylark plots will also need to be include within the LEMP detailing management and protection measures for the required nesting plots.

Bats

Clarification has been provided that no bat roosting potential trees are proposed to be removed. It is recommended avoidance measures for these trees are to be provided within the CEMP. It is recommended to reduce impacts for commuting and foraging bats by securing a wildlife sensitive lighting strategy for the site. Should lighting be required.

GCN

Evidence of the GCN district licence is to be provided to the LPA for review. Once this has been provided it is recommended to consult and refer to the Newt Officer comments.

Water vole and Otters

Mitigation and compensation measures can be secured via CEMP.

Badgers

Mitigation and compensation measures can be secured via CEMP. This is to include pre commencement checks and surveys.

Invertebrates

Mitigation and compensation measures particularly for black and brown hairstreak butterflies can be secured via CEMP. Details should include pre-commencement checks of impacted areas of hedgerow with egg inspections to those sections of hedge being removed in line with current standards on these procedures.

Natural Buffers

All permanent built works will be at least 10m away from the existing watercourse similarly 5m away from hedgerows and is therefore in accordance with NE2 and NE8 of the local plan.

Biodiversity net gain

Appropriate evidence has been provided in the form of BNG metric copy and biodiversity net gain assessment & reasoning for proposed habitat creation and enhancement (wildlife trust consultancies,

July 2024). The proposed development will result in the gain of 27.85 (47%) habitat units, 18.43 hedgerow units (40.95%) and 0.77 watercourse units (4.38%).

Can be secured within the CEMP and LEMP.

Enhancement features

In line with recognised good practice and government policy on biodiversity and sustainability, all practical opportunities should be taken to harmonise the built development with the needs of wildlife.

The provided reports identify many and different enhancement features such as bat boxes, Tawny Owl boxes, hibernaculum's, general bird boxes etc. The static bat detector survey recommended a minimum of 20 bat boxes.

It is imperative that the biodiversity features are integrated into suitable structures (as far as can be expected), rather than vulnerable, isolated and temporary boxes for example, in order to help ensure the success of such features. The location and model of the features need to be clearly marked on the approved plans and drawings. Alternatively, these features can be secured by condition within the LEMP if this application is approved.

Conditions

Landscape and Ecological Management Plan (LEMP)

Condition: No development shall take place (including demolition, ground works, vegetation clearance) unless and until the Landscape and Ecological Management Plan (LEMP) has been submitted to and approved in writing by the local planning authority. The content of the LEMP shall include the following.

- a) Description and evaluation of features to be managed;*
- b) Ecological trends and constraints on site that might influence management;*
- c) Aims and objectives of management which will (without limitation) include the provision of biodiversity net gain within the Site as shown within the biodiversity net gain assessment & reasoning for proposed habitat creation and enhancement (wildlife trust consultancies, July 2024);*
- d) Appropriate management options for achieving aims and objectives;*
- e) Details of appropriate species specific biodiversity enhancement features;*
- f) Should the site require lighting, details of appropriate wildlife sensitive lighting strategy to include a lux plan of the site is required;*
- g) Appropriate information in relation to Skylark plots and ground nesting bird habitat in accordance with 'provision for skylark' plan (November 2024). This should include use of fencing;*
- h) Prescriptions for management actions;*
- i) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a thirty-year period);*
- j) Details of the body or organization responsible for implementation of the plan; and*
- k) 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 be for no less than 30 years. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEcMP 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.

Reason: To ensure appropriate protection and enhancement of biodiversity, to make appropriate provision for natural habitat within the approved development and to provide a reliable process for implementation and aftercare.

Construction Environmental Management Plan: Biodiversity

Condition: No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following.

- a) Risk assessment of potentially damaging construction activities;*
- b) Identification of "biodiversity protection zones." This should include protection of watercourse, trees and hedgerow;*
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements specific species including reptiles, water voles, otters, breeding birds, bats, badgers, hairstreak butterflies);*
- d) The location and timing of sensitive works to avoid harm to biodiversity features;*
- e) The times during construction when specialist ecologists need to be present on site to oversee works. Including pre commencement surveys for reptiles, badgers and brown & black hairstreaks;*
- f) Should any lighting be proposed, details of appropriate wildlife sensitive lighting strategy to include a lux plan of the site;*
- g) Responsible persons and lines of communication;*
- h) The role and responsibilities on site of an ecological clerk of works (ECOW) or similarly competent person; and*
- i) Use of protective fences, exclusion barriers and warning signs.*

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details.

Reason: *To ensure that development is undertaken in a manner which ensures important wildlife is not adversely impacted.*