

34 BALLYVALLAGH RD BESS

Technical Clarification Report

Contents

1	INTRODUCTON	2
1.1	Overview	2
2	BIODIVERSITY	3
2.1	Smooth Newt	3
2.2	Invasive Species	3
2.3	PRF-I Tree Locations	4

1 INTRODUCTION

1.1 Overview

This document addresses queries in relation to biodiversity and the natural environment as set out in a letter from the Department for Agriculture, Environment and Rural Affairs (DAERA) on 17 February 2026 in relation to a planning application for a proposed BESS installation & associated infrastructure. The response from DAERA was based on the following submitted documents:

Biodiversity

- Ecological Impact Assessment (EcIA)
- Shadow Habitats Regulations Assessment (sHRA)

2 BIODIVERSITY

2.1 Smooth Newt

2.1.1 NED Comment

NED notes from the EclA, suitable habitat on site for smooth newt, a fully protected species under the Wildlife (NI) Order 1985 (as amended). Drainage channels from a watercourse east of the site flow into marshy grassland within the application area which then drains toward several ditches to the west. NED has concerns that in spite of baseline ecological conditions, smooth newt is not referred to in the EclA.

Therefore, NED requests clarification on survey effort for smooth newt and consideration of the need for full survey of the site for this protected species to NIEA specifications.

2.1.2 RPS Comments

RPS can clarify that as part of the wider Extended Phase 1 Habitat Surveys conducted on site, an assessment for smooth newt suitability and presence was conducted.

No historic records of smooth newt were found during the NBN atlas records search conducted to inform the EclA.

No suitable habitats were found on site, with all drainage channels and ditches either possessing flowing water (originating from the eastern watercourse) or otherwise showing low habitat suitability for smooth newt being dry with no standing water. No ponds or other waterbodies are present on the site. The site primarily consists of improved grassland with low suitability for smooth newt.

No evidence of smooth newt using the site was found during the extended phase 1 habitat survey. Smooth Newt was therefore scoped out of assessment in the EclA and not assessed any further.

2.2 Invasive Species

2.2.1 NED Comment

Invasive Non-Native (plant) Species

NED notes a slight discrepancy in the EclA regarding presence/ absence of invasive nonnative species (4.3 and 5.3). NED considers it unclear whether any species are to be considered or not. NED would highlight that some species previously listed under Schedule 9 of the Wildlife (NI) Order 1985 (as amended) are now regulated under the Invasive Alien Species (Enforcement and Permitting) Order (NI) 2019.

In such cases, the relevant team in NIEA is informed and the landowner contacted by them in due course. If, however, any invasives listed under Schedule 9 are present, then an Invasive Species Management Plan (ISMP) is likely to be required by NED.

Therefore, NED requests Natural Environment Division clarification regarding the presence/ absence of any invasive non-native plant species. If any plants listed under Schedule 9 of the Wildlife (NI) Order 1985 (as amended) are present, then an ISMP will be required.

Please refer to DAERA's Standing Advice for further information on Invasive Alien Species: <https://www.daera-ni.gov.uk/publications/standing-advice-development-land-may-affect-natural-heritage-interests>

2.2.2 RPS Response

RPS can clarify that no invasive non-native species listed under Schedule 9 of the Wildlife (Northern Ireland) Order 1985 were found within the application site boundary.

Section 5.3 highlights that “Pre-construction site clearance and construction works will not result in the disturbance and potential spread of the non-native species present on site”, therefore “No Schedule 9 listed invasive species with the ability to aggressively spread (e.g Japanese Knotweed, Himalayan Balsam) were present on site.”

The site boundary has been reduced in size since the habitat and species-specific surveys were conducted. Nuisance species and garden escapees are now found outside the boundary of the site (*rhododendron*, *winter heliotrope* and *cherry laurel*) (See **Figure 1.0 Target Note Locations**). These species will be removed/controlled if found within the proposed BESS development’s boundary.

No significant impacts on the application site, nearby designated sites or nearby habitats are expected due to invasive non-native species. No schedule-listed species were found; therefore, no Invasive Species Management plan is required.

2.3 PRF-I Tree Locations

2.3.1 NED Comment

NED also notes that two trees classified as having Potential Roost Features for individual bats or a small number of bats (i.e. PRF-Is), are to be retained. As such, NED are also satisfied that no further survey of these trees is required. However, the locations of both trees identified as PRF-Is are not shown on any site plan. Therefore, NED requests that all PRF-I trees are clearly shown, as retained, on a Landscape Plan (or equivalent). PRF-I trees are clearly shown, as retained, on a Landscape Plan (or equivalent).

2.3.2 RPS Response

RPS has prepared the following map below (**Figure 1.0 Target Note Locations**) showing the proposed development boundary and the location of the two trees (TN1 and TN5) with PRF-I features. Both trees will be retained, and are located outside the development boundary. No works will occur on either tree.

The details of both trees have been summarised below in **Table 1.0 Preliminary Roost Assessment for Bats**

Table 1.0 Preliminary Roost Assessment for Bats		
Structure Ref No.	Description	Bat Roost Suitability
TN1 Beech Tree	Target Note 1 is a Beech Tree (<i>Fagus sylvatica</i>) embedded within a hedgerow on the northwestern boundary of the application site. The tree lacked any ivy cladding but possessed a few examples of deep notches or cracks that could be used a roosting habitat for individual bats. This tree is to be retained.	PRF-I (Notches/Cracks)
TN5 Ash	Target Note 5 is an Ash Tree (<i>Fraxinus excelsior</i>) embedded within a hedgerow on the northwestern boundary of the application site. The tree lacked any ivy cladding but possessed numerous examples of deep notches or cracks on its bark that could be used a roosting habitat for individual bats. This tree is to be retained.	PRF-I (Notches/Cracks)



Figure 1.0 Target Note Locations