

Planning Applications Manager
High Peak Borough Council
Planning Department
Municipal Buildings
Glossop
Derbyshire
SK13 8AF

For the attention of Rachael Simpkin

Your Ref: HPK/2023/0442

Our ref: DWTHPK713b

23rd August 2024

Dear Rachael,

Proposal: Proposed solar array, supporting energy infrastructure and associated site works incorporating, access, security fencing and landscape planting.

Location: Carpenter Plc, Dinting Lodge Industrial Estate, Dinting, Glossop, Derbyshire, SK13 6LE

Application Ref No: HPK/2023/0442

With reference to the above application, I am responding as the Biodiversity Planning Officer responsible for work relating to the Service Level Agreement, which the High Peak Borough Council and the Trust have signed. The following comments are aimed at providing accurate and up to date information on the nature conservation issues associated with the proposed development.

Response

Further to our response dated 8th January 2024, we have reviewed the following additional documents:



- Biodiversity Net Gain Calculations Report (Mabbett & Associates Ltd., August 2024)
- Botanical Report (Mabbett & Associates Ltd., July 2024)
- Updated metric and condition assessments (Mabbett & Associates Ltd., July 2024)

Habitat and Local Wildlife Site Designation

A botanical survey of the site was carried out in June 2024, in the optimal survey season. It has also been confirmed that the entire application area was stripped around four years ago in association with the expansion of the business park and therefore the habitats present have re-established since then.

The June 2024 survey assesses the site to support the following (UKHabs) habitats, the first three of which correspond to the LWS description of rush-pasture:

- Holcus – Juncus neutral grassland (g3c8)
- Deschampsia neutral grassland (g3c7)
- Other neutral grassland (g3c)
- Bramble scrub (h3h)

None of the areas are reported to comprise lowland meadow, as suspected during the Preliminary Ecological Assessment carried out in March 2023. However, we would query whether the habitats on site have been assessed against the UKHabs priority habitat 'Rush pasture and purple moor-grass'. It may be that the habitats would not meet the criteria, however given that no quadrat data or DAFOR ratings have been supplied, it is difficult for us to determine this and we advise that confirmation is sought from the ecologists.

The report states that several LWS indicator species were recorded on site but it is apparent that a sufficient number were not present to qualify against the LWS criteria, in isolation. We would point out however that the LWS comprises a mosaic of grassland, with species-richness varying across the site. Whilst the area included within the red line boundary may only support several indicator species, this still contributes to the wider LWS.

BNG

We note that strategic significance is set to low in the metric. We would not agree with this given that part of the site is located within an LWS and the rest is immediately adjacent. This should be amended to high and medium, respectively.

We are pleased to see that the area beneath the solar arrays have been classed as sealed surface in the metric calculations.

We consider that the target of achieving 'good' condition for the various types of neutral grassland is ambitious. It is evident that this is what is required to achieve at least 10% gain in the metric, however there will undoubtedly be damage to the grassland from the installation and then ongoing shading effects between panels. We do not often see solar farms predicting 'good' condition grassland between panels for these reasons and it is more common to see 'poor' quality 'other neutral grassland' or even 'modified grassland' between panels and 'good' quality grassland around the site perimeters. Achieving 'good' quality would also be reliant on appropriate management and it is not clear how the site would be managed in the future. Recommendations for an annual cutting regime are made but due to the wet and rushy nature of the site, it is not clear if cutting is feasible or if it could be grazed as an alternative. We advise that additional information should be sought on land ownership and feasible management options for the site. Currently we are not confident that good condition could be achieved across the whole site.

There appears to be an error in Section 4.0 of the BNG report, which states that the metric predicts 'good' condition in only one-year post-completion. We note that this is incorrect and the metric predicts that it will take between 10 and 15 years to reach the target condition.

If a lower condition grassland were predicted between panels, then additional offsite measures are likely to be required to achieve a minimum of 10% gain.

Conclusion

Despite its history of recent degradation, the application area supports various marshy grassland communities, which complement the adjacent LWS. The proposals will also directly affect 0.355 ha of the LWS, which is included within the application boundary.

Policy EQ5 of the High Peak Local Plan seeks to conserve and enhance regionally and locally designated sites. *"On these sites the Council will not permit any development proposal which would directly or indirectly result in significant harm to geological and biodiversity conservation interests"*, unless numerous requirements can be demonstrated, as listed in the policy wording. These include achieving a net gain and securing adequate mitigation or compensation.

Even with retention of grassland around the solar panels, the target condition is questionable due to impacts of the solar arrays and the queries surrounding future management. Installation

of solar arrays would likely require reassessment of the LWS in the future and could result in a potential reduction in size of the LWS. Furthermore, additional degradation may result from the temporary access track in the north of the LWS. Whilst we welcome the recommended measures to protect the habitats with matting, the ground is likely to be compacted and vegetation damaged to some extent.

To fully compensate for impacts within the LWS boundary, we would expect to see enhancements across the wider LWS. In order to grant consent for the proposed works, we consider it reasonable to secure onsite habitat measures, alongside securing improved long-term management across the LWS as a whole.

It is hoped that the information provided is helpful to the Council. If you require any further information or wish to discuss any of the comments made, please do not hesitate to contact me.

Yours sincerely,

Libby Duggan-Jones MBiolSci MCIEEM
Biodiversity Planning Officer

Endnote:

Please see our planning pages <https://www.derbyshirewildlifetrust.org.uk/planning> for ecological advice on submitting a planning application, finding an ecological consultant and information on mitigation and enhancement.