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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: DWTHPK713c

4th November 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 23rd August 2024, an updated metric and BNG Calculations report have been submitted (Mabbett, September 2024), alongside a response letter to our comments.



We are aware that a landscape plan is currently awaited and therefore it may be necessary to further update the metric.

We noted that that many of our previous comments had been addressed, however we considered that a site visit would be useful to finalise our response. The purpose was to verify the grassland classifications, gain an understanding of the interface between the Carpenter site and the LWS, and to understand the general layout and topography of the site.

After our site visit, we can confirm that we are satisfied with the habitat classification provided by the ecologists and agree that 'other neutral grassland' is more representative of the habitat present than 'Purple moor grass and rush pasture' (both onsite and offsite).

As previously acknowledged by all parties, the grassland within the red line area does include a fair number of LWS indicators species but some of these are at low abundances and therefore the application area in isolation would not qualify under Local Wildlife Site (LWS) criteria. Hard rush is very dominant across much of the site, with little opportunity in some areas for floristic diversity. However, given the number of indicator species recorded during an October visit and the general damp and rushy character of the grassland, we consider that the land within the red line boundary would contribute to the wider grassland resource within the LWS.

Proposals now include enhancement of the retained grassland within the red line boundary, plus enhancements of grassland outside the red line boundary, including an area of grassland to the north-west and a strip of grassland in the north-east. All onsite grassland will be enhanced to at least moderate condition and all offsite grassland to good condition, to provide the uplift in units required to achieve the net gain. Based on the BNG report, a net gain of +1.17 habitat units (10.11%) is predicted.

Management of the site will be essential to maximise the floristic diversity and biodiversity value of the retained and enhanced grassland. This would require an annual cut at the end of the summer, as per the BNG Calculations Report (September 2024). We advise that the value of the site to invertebrates and small mammals should be recognised in the detail of the management prescriptions and recommend that all of the grassland should not be cut every year. Either 50% could be cut one year and 50% could be cut the next or 70% cut and 30 % left each year. The grassland management will require suitable machinery and expertise due to the topography of the site and the rushy / tussocky nature of the grassland and arisings should be removed, potentially to a designated area to form a habitat pile. This detail can be agreed in a

Landscape and Ecological Management Plan (LEMP) or a Habitat Management and Monitoring Plan (HMMP), post-determination.

Currently, the report recommends sowing the grassland to increase its diversity. We would recommend a combination of over-sowing in some areas and allowing the existing seedbank to emerge once the vegetation is kept in check with regular management. Sowing after installation of the panels would take advantage of the bare ground created. The report suggests RE2 Lowland Meadow (MG9 Grassland) seed mixture, however we suggest a mix such as Naturescape's N7 Wetland Meadow mixture, which includes devil's bit scabious and great burnet, which are present in low abundances in the adjacent LWS.

In our previous letter, we commented that we would expect to see enhancements across the wider LWS, to offset the impacts of the proposal. Whilst we recognise that 10 % gain is currently predicted with only a strip of the wider LWS included in enhancement proposals, we would remind the LPA that proposals will encroach within the boundary of the LWS and therefore a more ambitious target may be appropriate. Given that the LWS is within the applicant's landholding and that management will be taking place each year anyway, we would encourage a larger area of the LWS to be included within the yearly management regime. Furthermore, the narrow strip of grassland adjacent to the former access track has no actual boundary and will be tricky to manage and monitor in isolation.

Further to the grassland enhancement, hedgerow planting is proposed along the eastern boundary of the site. Whilst not essential from a BNG perspective, this is considered acceptable and species should be chosen to complement the existing species and local landscape. Management of the hedgerow should be included within a LEMP / HMMP.

Careful consideration should be given to the timing of works to avoid impacts to herptiles and nesting birds. Preferable times of year would be early spring and autumn, to avoid nesting birds and overwintering herptiles.

We advise that the following conditions are attached:

HMMP / LEMP

Wording to be agreed. As the application was submitted prior to mandatory 10% BNG, either a LEMP or a HMMP should be secured to specify management and monitoring prescriptions to achieve the agreed BNG targets. Either document would suffice and we advise that prescriptions are set for a 30-year period.

Construction Environmental Management Plan (CEMP: Biodiversity)

No development shall take place (including ground works, vegetation clearance and movement of plant, machinery and materials) 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 be produced by an ecologist and shall include the following.

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of “biodiversity protection zones”.
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction to common amphibians, reptiles, nesting birds and other wildlife.
- 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.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h) 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, unless otherwise agreed in writing by the local planning authority.

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.