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

**For the attention of Rosie Dinnen**

Your Ref: HPK/2024/0467

Our ref: DWTHPK763

29<sup>th</sup> January 2025

Dear Rosie,

**Proposal: Battery Energy Storage System and associated works.**

**Location: Land West of Buxton Road Dove Holes**

**Application Ref No: HPK/2024/0467**

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

We have reviewed the Preliminary Ecological Appraisal (Ellendale Environmental, July 2024), Biodiversity Net Gain Assessment (Ellendale Environmental, not dated), lighting details and Landscaping Plan. In summary, sufficient information has not been provided to date to enable determination of the application.



### Habitats and Species

No consultation was carried out with Derbyshire Biological Records Centre (DBRC) to inform the ecological assessment. Guidance provided by CIEEM<sup>1</sup> 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.

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.

Terrestrial habitat on site is suitable for amphibians and reptiles and the report recommends survey for GCN and reptiles in Section 4.1. Whilst records of common frog, grass snake and smooth newt are present locally, there are no records of great crested newt within 1km of the application area. No ponds are present within 250 m but two are recorded within 500 m to the west of the A6. We advise that encountering GCN on site is unlikely and that specific survey is not required. However, reptiles could be present.

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.

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

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<sup>1</sup> CIEEM (2020) Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. 2nd Edition. Chartered Institute of Ecology and Environmental Management. Winchester, UK.

woodland adjacent to the northern boundary, with levels of  $\geq 2$  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.

### BNG

No copy of the metric has been uploaded and the BNG report refers to metric 4.0. It is a mandatory requirement that the Statutory Metric is used and this should be checked. A copy of the metric should be provided for review.

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.

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 Landscape Plan should be cohesive with the BNG assessment and should include appropriate species mixes.

Once the above comments have been addressed, we can recommend suitable condition wording.

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.