



Derbyshire
Wildlife Trust

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

For the attention of Declan Cleary

Your Ref: DWTHPK/2024/0467

Our ref: DWTHPK763a and b

27th March 2025

Dear Declan,

Proposal: Battery Energy Storage System and associated works.

Location: Land West of Buxton Road, Dove Holes, Derbyshire

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 previously commented on this application in our letter dated 25th January 2025. Since then, we have received two re-consultations on new or updated documents. We have reviewed the following:



- Site Layout Rev. 7
- Landscape Plan Rev. A
- Updated PEA (Ellendale Environmental, February 2025)
- Reptile Survey and Assessment (Ellendale Environmental, October 2024)
- BNG Assessment (Ellendale Environmental, Not dated)
- Response to DWT comments (Ellendale Environmental, Not dated)

In summary, mitigation to safeguard reptiles appears possible but this will be dependent on a suitable Reptile Mitigation Strategy secured via condition. Habitats should be retained where possible and post-development landscaping must be appropriate to the site / local area and to maintain the confirmed slow worm population. We advise that amendments are required to the Landscape Plan, unless details can be finalised at a later stage. We have some queries regarding BNG and cannot currently advise whether a net gain will be delivered onsite. The updated lighting plan is now considered acceptable. Full comments are provided below:

Habitats and Species

A data consultation has been undertaken, as per our previous comments, and added to the PEA. It transpires that reptile surveys were undertaken in late August and September 2024, which recorded a single slow worm on one survey occasion. Mitigation measures are recommended in the Reptile Survey Report, which should be finalised and agreed with the LPA in a Reptile Mitigation Strategy secured via a pre-commencement condition. Consultation with Natural England is not considered necessary, given the species and low numbers present.

We suggest that a combination of displacement (by supervised habitat cutting and clearance) and active movement of any individuals found to adjacent habitats would be suitable. Refugia could be utilised on the site to increase the likelihood of capture, prior to habitat clearance, however a prolonged capture period does not seem proportionate. Temporary fencing may be required, dependant on the locations of the receptor area and the extent and timing of onsite habitat clearance. This type of work is typically undertaken during the active season and therefore it will need to be preceded by a nesting bird check, to include ground nesting species.

Onsite habitats surrounding the BESS compound should be designed with reptiles in mind. As per the Reptile Report recommendations, stone walls should be retained and hibernacula creation is welcomed. The grassland outside the compound should ideally be retained (depending on the area required to facilitate construction) or recreated to match the tussocky / rushy grassland currently in situ. We do not consider that tree planting is necessary within the grassland, as this

will likely alter on site water levels. Tree planting should be limited to only what is necessary for screening purposes. Appendix 1 of the Reptile Report is based on an old Landscape Plan and does not reflect the current layout. This should be updated in the final Reptile Mitigation Strategy.

BNG

A copy of the metric (V1.0, 22nd August 2024) has now been provided. Based on the species list and photographs, we are surprised at the classification of modified grassland. Species recorded, including bird's-foot trefoil, pignut, vetches, meadow foxtail, tufted hair grass and rushes, would suggest that it aligns more closely with other neutral grassland. This should be amended or justification should be provided as to the baseline classification, with reference to the UKHabs habitat definitions.

The response from Ellendale Environmental states that “*grassland habitat within the site will be retained and enhanced with additional seeding as required*”, however the metric currently reflects the total loss of all onsite grassland, with habitats re-created after works. As per our previous letter, the existing grassland is of value and we advise that further detail should be provided by the applicant as to which areas can feasibly be retained and fenced off during construction. Based on the current landscape Plan, the footprint of the BESS appears reduced and we would hope that much of the western area could be retained and fenced off from impacts. If this is possible, the metric should then be updated.

Where grassland must be re-sown, it should be representative of the damp tussocky / rushy grassland appropriate to the area and currently used by slow worm. We suggest that a seed mix such as NV7 (Naturescape) or Damp Meadow (Cotswold Grass Seed), or similar, should be used for enhancement and creation. As previously mentioned, we would not suggest tree planting within the grassland, even if this reduces the gains, as it does not seem ecologically appropriate.

Lighting

An updated Environmental Lighting Impact Assessment Report has been submitted, showing reduced lightspill to the northern woodland. We can confirm that we are satisfied with this aspect.

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

Libby Duggan-Jones MBiolSci MCIEEM

Biodiversity Planning Officer

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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.