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Wildlife Trust

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

For the attention of Declan Cleary

Your Ref: HPK/2024/0467

Our ref: DWTHPK763c

8th May 2025

Dear Declan,

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

Reptiles – matters addressed

In our letter dated 27th March 2025, we advised that a Reptile Mitigation Strategy could be secured via pre-commencement condition. However, a Reptile Mitigation Strategy V1.0 (Ellendale



Environmental, April 2025) has been recently submitted at this stage of the application. The Strategy contains the mitigation details previously outlined in the Reptile Survey and Assessment (Ellendale Environmental, October 2024) and still includes the requirement to finalise the details of the mitigation with High Peak Borough Council. Therefore, a condition will still be required to update the Strategy prior to commencement. The comments provided in our previous letter are still applicable and we advise that the ecologists contact DWT to agree the final details of the mitigation, prior to commencement and to enable the condition to be discharged. The figure in Appendix A now reflects the final proposed layout, however it should clearly show any required reptile fencing and label the areas for translocation.

Suggested condition wording

Prior to commencement of works, including any habitat clearance, ground works and movement of machinery or materials, the Reptile Mitigation Strategy V1.0 (Ellendale Environmental, April 2025) shall be updated with the final details of the mitigation approach. These details shall be agreed with High Peak Borough Council and the agreed Strategy implemented in full to safeguard slow worms at the site.

BNG – matters outstanding

An updated version of the BNG Report (Ellendale Environmental, not dated) has been submitted, along with a revised metric (V1.5, 7th April 2025) and condition assessments. The metric incorrectly assigns ‘poor’ condition to the grassland, instead of ‘moderate’, however we still question the overall classification of modified grassland.

We remain concerned that the grassland classification used in the metric may have undervalued the grassland type due to the differences in the description and terminology used in the reports. If the applicants’ ecologists could provide their justification and data to support the grassland being assigned to the modified grassland type rather than other neutral grassland that would be appreciated. As previously noted the grassland was mapped as semi-improved grassland in the Preliminary Ecological Appraisal (not species-poor semi-improved). This typically equates to other neutral grassland in UKHabs. The species list is also indicative of other neutral grassland, and we remain concerned that the habitat is currently undervalued in the BNG calculations.

The report reflects the proposed layout and the metric indicates the retention of 0.65ha of onsite grassland (~40% of existing grassland). We assume the losses are to facilitate the proposed BESS and landscaping and any temporary disturbance during works. Any requirements for a site compound etc should be set out and approved, and grassland which can remain entirely

unaffected should be fenced off during works (we assume that would comprise the reptile receptor site). We still maintain that there should be no tree planting in the western grassland, other than any essential screening measures and query why the scattered trees are required? A detailed Landscape Plan should be submitted and agreed, including a suitable grassland seed mix, as per our previous letter.

In conclusion, our previous comments made regarding BNG have not been addressed and a habitat baseline on which to base the BNG assessment has not been agreed.

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.