

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

For the attention of Rachael Simpkin

Your ref: HPK/2022/0484

Our ref: DWTHPK680

3rd February 2023

Dear Rachael

Proposal: Proposed glamping site, to include 10 glamping units, 5 units for facilities and covered parking for 10 cars

Location: Land off Long Lane, South of Chapel-en-le-Frith High School, Chapel-En-Le-Frith, Derbyshire, SK23 0TQ

Application Ref No: HPK/2022/0484

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

The Trust commented on the previous application at this site in 2021 (HPK/2021/0388). At that time, the ecological survey was undertaken out of season (December 2020) and the report did not include a desk study. As such, it did not consider impacts to the nearby Local Wildlife Site: Down Lees and Barlow Farm Fields. No Biodiversity Net Gain Assessment was undertaken.

We have reviewed the documentation provided with the current application, including the Extended Phase 1 Habitat Survey and Daytime Bat Survey (Rachel Hacking, October 2022), Proposed Site Plan Landscaping Details Rev. A and the Design and Access Statement (Oulsnam Design, August 2022). We still consider that **information is outstanding**, as detailed below:

The recent ecological survey was carried out in September, which is at the end of the survey season but a reasonable characterisation of the habitats should be possible. The grassland is described as being drier than in 2020 and characterised as 'improved grassland' rather than 'marshy grassland'. No particularly notable species or diversity of species was recorded. It is currently horse-grazed. We recognise that removal of grazing and change of use could provide opportunities to enhance the grassland in certain areas and that this could potentially offset the loss of grassland within the footprint of the glamping accommodation, footpaths and access road. However, this still hasn't been quantified through use of a metric and therefore it is difficult to advise the LPA whether no net loss / a net gain will be achieved. For the LPA to be able to assess proposals against net gain policies, and to guide any new landscaping, a biodiversity metric should be submitted.

The other main concern at this site is the potential for the change of use to impact the nearby LWS, namely via disturbance to the ground-nesting bird assemblage it supports, and to a lesser degree brown hare.

The nearby LWS comprises an important site in the local area for species such as snipe, lapwing and curlew, with numerous records of these and other species held on the Trust database. Currently the ecology report recommends several measures to minimise disturbance to birds in the LWS, including signage to site users to keep dogs on leads, clear maps showing where footpaths are and encouragement to visit other greenspace nearby. No guarantee can be made that users will follow such guidance. We advise that this minimal mitigation does not provide sufficient confidence that the species using the LWS will be safeguarded against adverse impacts.

We note that some additional information is provided in the Design and Access Statement regarding lighting and times of operation of the glamping site and we advise that a more thorough Assessment and Mitigation Strategy to safeguard the LWS should be submitted with this

application. This should consider the various potential impacts to the LWS and detail the mitigation measures that would be implemented, should permission be granted. Timings of operation are important to consider as the LWS will be used differently by species during different seasons and is likely most sensitive during the core breeding period. As well as management of dogs and walkers, we suggest consideration should be given to mitigating noise levels through landscape screening and site noise/curfew policies, minimising lightspill, and providing visual screening via landscaping along the boundary closest to the LWS. It would also be helpful to provide a clear map of footpaths connected to the site and investigate whether the route of any footpaths / tracks could be fenced to prevent dogs entering the fields within the LWS.

We would be happy to review the additional information, once made available.

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,

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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.