TETRA TECH

Our Ref: 784-B039096

FAO: Derbyshire Wildlife Trust
C/O Wain Homes,
Kelburn Court
Daten Park
Warrington
WA3 6UT

12 May 2023

Dear Libby

DINTING VALE, GLOSSOP

Thank you for your comments relating to the ecological assessment at the above site, Tetra Tech have reviewed the comments raised by Libby Duggan-Jones MBiolSci MCIEEM, Biodiversity Planning Officer, DWT dated 1st December 2022, to the proposed development as Dinting Vale, Glossop planning reference HPK/2022/0456 and have provided the following response as set out over the following pages.

Two meetings have been held between Tetra Tech (TT) and DWT to discuss the comments raised:

- The first meeting on the 11th January 2023 between Associate Director Rachel Kerr (TT), Project Ecologist Jade Armstrong (TT) and Libby Duggan-Jones (DWT) was held to have a general discussion around the comments raised by DWT.
- The second meeting on the 1st February 2023 between Associate Ecologist Dr Tim Rich (TT), Project Ecologist Jade Armstrong (TT), Libby Duggan-Jones (DWT) and Kieron Huston (DWT) was held to discuss the botanical interest of the site in further detail.

BACKGROUND INFORMATION

The development site is located south of A57 Dinting Vale, Glossop, east Manchester and centred at Ordnance Survey National Grid Reference SK 01926 94214 (see Figure 1).

The site includes plantation broad-leaved woodland in the north with scattered broad-leaved trees throughout the site. The southern area of the site is dominated by neutral and marshy grassland with areas of dense/continuous scrub and tall ruderal. There is also a pocket of semi-improved neutral grassland to the north of the site and a hard standing road forming access to existing adjacent residential properties and an area of running water in the north-east and southern corners of the site.

A new residential development is proposed with 92 properties, associated infrastructure, and landscaping (Appendix A - Site drawing: 4263 101B Landscape Masterplan). Access will be via a new road to be created to the north of the site providing access from Dinting Vale Road (A57).

The proposed plan (see Appendix A) shows that the neutral grassland, plantation woodland, tall ruderal vegetation, pond, scattered trees, introduced shrub and scrub will mostly be lost to facilitate the proposals.

Existing Ecological Information

The site has previously been subject to an Ecological Appraisal in January 2021 (The Environment Partnership, 2022) which identified the habitats and ecological constraints present onsite.

Additionally, the site has undergone the following surveys and reports:

- Tetra Tech (2022a) Bat Survey Report (Activity) - Dinting Vale, Glossop.
- Tetra Tech (2022b) Bat Survey Report (Trees) - Dinting Vale, Glossop.
- Tetra Tech (2022c) eDNA Results Letter Report - Dinting Vale, Glossop.
- Tetra Tech (2022d) Invasive non-native species report – Dinting Vale, Glossop.
- Tetra Tech (2022e) Reptile Report - Dinting Vale, Glossop.
- Tetra Tech (2022f) Badger Report – Dinting Vale, Glossop.
- Tetra Tech (2023a) Biodiversity Net Gain Assessment (Rev4) - Dinting Vale, Glossop.
- Tetra Tech (2023b) LWS Criteria Letter Report – Dinting Vale, Glossop.
- Tetra Tech (2023c) Breeding Bird Survey Report - Dinting Vale, Glossop.
- The Environment Partnership (2022) Ecological Appraisal – Dinting Vale, Glossop.
- Baker Consultants (2022) Dinting Vale, Glossop Invertebrate Survey Report.

A NVC and large garden bumblebee report will also be produced following completion of surveys within summer 2023.

TETRA TECH

COMMENT REVIEW ADND RESPONSES

The table below provides extracts from the letter dated 1st December 2022 as well as TT response, including additional information and any further actions.

Table 1: Comments and Responses

	Comment raised by DWT	Response	Further actions
1	*We request justification for the habitat classifications in the BNG Assessment, including full species lists and a figure showing the locations of quadrats and plot references referred to in the condition assessments.* *Sufficient survey information should be available to determine if indicator species are present at sufficient abundance for the site to qualify as an Local Wildlife Site (LWS). The Trust are willing to share our data with the consultants undertaking this element of works.*	A species list collected in September 2022 by DWT was provided to TT. TT botanical specialist Dr Tim Rich reviewed the following data sets in combination and concluded that the occurrence of acid grassland on site is no longer accepted and all grassland on site is considered either **neutral** or **marshy grassland**: • The species list within The Environment Partnership (TEP) Ecological Appraisal (2022) • The species list collected during TT Condition Assessment survey (2022) to inform a biodiversity net gain (BNG) assessment • The supplementary species list provided by DWT. **Based on this review TT consider that the habitat classifications for the site are accurate.** A detailed review of the LWS criteria against the site conditions has been provided within a standalone letter report (Tetra Tech, 2023b). In summary this found that the site met one grassland criterion and	During the meeting of the 1st February 2023 (DWT and TT), DWT expressed concerns that the floristic value of the site was not fully represented and requested further survey in the form of a National Vegetation Classification (NVC) survey within the appropriate survey period. TT have been instructed by Wain Homes to complete an NVC survey during the 2023 season within the optimal period (currently proposed for late May / early June). Once the findings of this survey have been analysed these will be presented in a letter report.

	Comment raised by DWT	Response	Further actions
		three faunal assemblage criteria (in particular reference to bird species). As such, the site **may be** eligible for designation as a LWS. This review has also been considered during the BNG assessment and as such the grassland and woodland have been given high strategic significance and a precautionary principle applied during the assessment. • It should be noted that during the initial Condition and BNG Assessments inaccuracies in habitats present on site were noted and adjusted within the assessment as follows: ○ Areas of grassland on-site appeared similar during the condition assessment and were merged into one habitat: other neutral grassland.	
2	*The report appears to indicate that the habitats from the Phase 1 survey have just been converted to UK Habs using a conversion tool and we consider that the value of the habitats present are likely underestimated.*	The translation tool is recognised within the Biodiversity Metric 3.1 itself. Therefore, it is considered to be a valid technique to convert habitats, Biodiversity Metric 3.1 - User guide page 26, Box 3-2: The UK Habitat Classification (UKHab) http://publications.naturalengland.org.uk/file/6593707725029376 *'If habitats have been classified using Joint Nature Conservation Committee (JNCC) Phase 1 Habitat Survey typologies, the resulting habitat types can be translated into UKHab for use in the biodiversity metric. A translation table between Phase 1 and UKHab types is provided within the biodiversity metric 3.1. This translation table can be found via the 'Technical data' button in the calculation tool.'* The strategic significance when input into the metric ranged from low strategic significance for habitats such as hardstanding and tall	A copy of the BNG metric is provided in Appendix B.

	Comment raised by DWT	Response	Further actions
		ruderal to medium strategic significance for scrub habitats. The woodland and grassland habitats were assigned high strategic significance as the LWS review was also considered during the assessment. The justifications are included within the TT BNG report Rev4 (Tetra Tech, 2023a). A copy of the BNG metric is provided alongside the report with the revised layout.	
3	*Local Plan Policy EQ5 requires development on locally designated sites to include sufficient mitigation to achieve no net loss or net gain where possible or else implement compensation measures. Whilst the site is not currently designated as an LWS, it is listed as a lower tier Grade 3 site and we advise that if further botanical survey shows that it meets the LWS criteria, this policy should be applied.*	The site is allocated for housing under High Peak Local Plan (High Peak Borough Council). *'The site itself, in addition to areas of adjacent land, has been assessed as a Grade 3 site for nature conservation (Adderley Place Rush Pasture HP R6012). A Grade 3 site is described as a site with some interest but not enough to warrant inclusion within the LWS system.*' A full review of the LWS criteria has been provided within a standalone letter report (Tetra Tech, 2023b). Within this report it is considered that the site may be eligible for designation as a LWS however only a low number of criterion are met. The BNG strategic significance of habitats (grassland and woodland) have also been assigned high during the assessment to account for the proximity to the LWS.	An NVC will be completed by TT in summer 2023 (see comment number 1). TT and Wain Homes have explored off-site areas for off-setting in order to reduce biodiversity net loss and achieve a gain to provide compensation measures (Tetra Tech, 2023a).
4	*A strategy for both onsite and offsite compensation would be required to ensure compliance with local and national policy, dependent on the scope for onsite retention and creation. This should be provided at this stage in the planning process to*	A 30-year management plan and BNG strategy has been produced (see Appendix C). The 30-year management plan will ensure any newly created or enhanced habitats both onsite and offsite are maintained.	N/A

	Comment raised by DWT	Response	Further actions
	enable the LPA to assess proposals against net gain policies and ensure mitigation and compensation measures are acceptable and achievable.		
5	*We agree that GCN presence is unlikely, however it should be acknowledged that the onsite pond is seasonal and, whilst it may dry out most years, it clearly holds water for a reasonable amount of time given the aquatic and marginal plant species recorded by both the November ecology survey and the September visit by the Trust. We strongly recommend that drainage solutions should create above ground features, which can provide the dual benefits for both drainage and biodiversity. These should be designed in appropriate locations and integrated within green infrastructure to provide access for wildlife.*	The revised layout shows the inclusion of three SUDs ponds located south of the public right of way towards the north of the site. The landscape plan demonstrates that the SUDs ponds will have value to wildlife and include Emorsgate EM8 meadow mixture for wetland as well as aquatic and marginal planting. The pond edge mixture will be EP1 which contains wildflowers and grasses suitable for wet margins of ponds, streams and ditches. The SUDs ponds are located adjacent to woodland which would create habitat connectivity.	N/A

	Comment raised by DWT	Response	Further actions
6			No further actions at this time, pre-construction survey to be conditioned.
7	*Buffering of the woodland edges would help to mitigate some of the impacts of a new development on the site but ultimately a relatively large area of foraging habitat would be lost and the northern woodland would be completely severed by the access road,*	The access road has a tight bend which is anticipated to calm any speeding traffic as motorists will have to slow to move along the road safely. As such no further traffic calming measures are considered necessary. .	N/A

	Comment raised by DWT	Response	Further actions
8	*Bird survey was not started until 20th June 2022, missing the months of March, April and May. This is contrary to best practice guidance and means spring breeders will be unrecorded, therefore the value of the site is potentially underestimated. Given the large degree of habitat loss and minimal retention of existing habitats, we advise that further bird survey should be undertaken with at least one survey per March, April and May, to conform with guidance and ensure a full impact assessment can be made. In addition to the species recorded during the surveys, use of the site by foraging barn owl and sparrowhawk has been confirmed through video and photographic records submitted to the Trust*	Species that typically breed early, including crossbill, raven and woodlark, are unlikely to be breeding on site due to no records being returned from during the data search from the Derbyshire Ornithological Society, and limited amount of suitable habitat on site (particularly for crossbill as they prefer extensive pine/conifer plantations). Other species that breed early including blackbird and woodpigeon were recorded during the 2022 breeding bird surveys conducted by TT and assessed as “probable” breeders and therefore other early breeding species were likely not missed. During the early 2023 surveys (March, April, May) woodpigeon and blackbird were again recorded as “probable” breeders. In addition, other "probable" breeders such as greenfinch, dunnock, whitethroat and wren were recorded during the 2022 breeding bird surveys were again recorded as “probable” breeders during the 2023 breeding bird surveys. All these species are Amber listed, with the exception of greenfinch which is red listed. The proposed 30m buffer in the revised layout around the boundaries of the site will remain scrubby/woody and these species would benefit from this. These specific species will also benefit from the tree/scrub planting in the landscape plan. Another important point to raise is that the assemblage of birds recorded during the breeding bird surveys is typical for the habitats present on site. The 2023 surveys identified a single additional species: treecreeper (currently listed as green), further demonstrating that the species assemblage recorded during both the 2022 and 2023 surveys was representative of the habitats present within the site.	N/A

	Comment raised by DWT	Response	Further actions
		Wading species such as golden plover, redshank, lapwing unlikely to be present within the site due to the sites small size and abundance of better habitats in the surrounding area. In addition, these species were not noted during the breeding bird surveys (2022 and 2023) or as incidental sightings during other surveys completed by Tetra Tech (tree climbing, reptile, badger). The proposed 30m buffer and proposed landscape planting would be of most value to breeding birds with the existing open grassland of little value as not suitable breeding habitat (due a short sward height, grazing from horses and disturbance from dog walkers) for a number of species. We therefore consider our assessment of the breeding bird assemblage to be reasonable, and on balance reflective of the species likely to breed on site.	
9	*However, the bat report concludes that some of these trees will be retained, whereas it appears from the Arboricultural Impact Assessment, that all will be lost. We would encourage this to be reviewed to see whether it is at all possible to retain any of these trees within a revised layout.*	Having reviewed the AIA against our report it does appear that more trees are being removed than initially anticipated. All trees previously identified with bat roosting potential have been subject to the appropriate survey effort (high potential – three visits etc) and no bat roosts have been identified. Due to the changes in tree removal, we would recommend that the precautionary approach is adopted for all trees identified within our report with bat roosting potential (Tetra Tech, 2022b) which includes a pre-commencement inspection / soft blocking technique / one way excluder and a soft / sectional fell approach adopted. This approach was originally recommended for T5a, T5b and T6 but should now be included for all trees with bat roosting potential.	Pre-commencement inspection prior to fell.

	Comment raised by DWT	Response	Further actions
10	*In addition to the species recorded during the surveys, use of the site by foraging barn owl and sparrowhawk has been confirmed through video and photographic records submitted to the Trust.*	No barn owl or sparrow hawk were identified during any of the breeding bird surveys (including the 2023 March, April and May surveys) or during any other surveys (including nocturnal bat surveys and tree climbing surveys) as such the site is unlikely to form a core sustenance area or roosting area for either of these species. Only one record for barn owl was returned from Derbyshire Ornithological Society from 2002, with no recent records returned. No barn owl nesting suitability noted within any of the trees during the bat tree assessment and no buildings located within the site. There is potential for occasional foraging within the site, but the site is not considered likely to be a core sustenance or nesting area within a home range. Similarly for sparrowhawk, none observed during any of the surveys and only two historic records returned (2006 & 2010) from Derbyshire Ornithological Society. It is considered likely that species only uses the site infrequently for foraging. An area of woodland is proposed to be removed to facilitate the proposals however, woodland to the east and west adjacent to the site is to be retained and residential gardens created which are known to attract small bird species which would be suitable prey for sparrowhawk. The proposed woodland buffer would also form a foraging area for barn owl as it is recommended that this area is subject to a relaxed mowing schedule and as such would have suitability for barn owl prey species.	N/A
11	*We would query parts of the impact assessment that appear*	The high number of bat calls detailed within the Tetra Tech bat activity report (Tetra Tech 2022a) in the northern portion of the site	N/A

	Comment raised by DWT	Response	Further actions
	to downplay impacts to local bat populations. The report identifies high levels of activity in the northern portion of the site. The Trust holds a record of a common pipistrelle maternity roost on Simmondly Lane, adjacent to the Zion Methodist Church from 2012. During bat surveys at the Church in May and June 2022, a commuting route was identified when surveys recorded 26 common pipistrelle bats flying westwards between 21:08 h and 22:35 h during the dusk survey and 25 bats flying the opposite direction during the dawn survey. This indicates that a maternity roost is still present in the vicinity of the application area and bats are commuting along the track and adjacent woodland, towards the application area and beyond. The northern woodland will have a large portion removed and this habitat will be severed by the proposed access road and associated lighting, potentially	can be attributed to the route and access. The high numbers of calls recorded are within an area that was dominated by Himalayan Balsam with a gate and as such surveyors required a greater period of time to move within this area of the site which resulted in more calls being recorded within this area. TT have reviewed our survey information and recordings and can confirm a maximum number of two bats were seen at any one time. A large proportion of the activity observed was single bats commuting or foraging. TT acknowledge that the heat maps included within the report (Tetra Tech, 2022a) do not accurately represent the activity observed during the surveys as these show the number of calls and not the individual number of bats. The closest record returned by the DWT was highlighted within both TEP Ecological Appraisal and TT Bat Activity report. The record was 200m east of the site which relates to the roost of Simmondly Lane, adjacent to the Zion Methodist Church. The access track from the east will remain unchanged with no additional lighting, as such this corridor will not be impacted. A line of trees and three SUDs ponds are proposed to lie adjacent to the retained Adderley Place track within the revised layout which will form a corridor for bat commuting and foraging areas around the SUDs ponds. The 30m woodland buffer to along the western boundary of the site will also form a commuting and foraging area for bats. Furthermore, a sensitive lighting strategy has been recommended throughout the site.	

	Comment raised by DWT	Response	Further actions
	affecting the access to the core sustenance zone for this roost. This should be considered further by the ecologists. The assessment did not appear to value the marshy grassland, which would undoubtedly provide excellent, insect-rich foraging habitat, supporting the surrounding woodland resource for local bat populations.	Bat friendly planting recommendations will be provided to the client and fed into the landscape planting plans which will mitigate the loss of foraging areas.	
12	*We support recommendations to buffer the woodland edges with minimum 10 m corridors and sensitive lighting will be essential to protect foraging and commuting habitats. The corridors should comprise retained marshy grassland, likely to support a good range of invertebrates. Currently, proposals will result in almost all the existing habitats being lost, with no significant buffers to the woodlands. The layout should be revised to a more sensitive design that accommodates appropriate*	A revised layout has been received which demonstrates: - 30m buffer along the western boundary of the site to buffer the woodland edge. - Sensitive lighting scheme has been recommended with particular attention to the site boundaries. - Inclusion of foxgloves, comfrey, marsh woundwort, honeysuckle and yellow iris for the large garden bumblebee. This would also attract other pollinators and insects for bat foraging. - Three SUDs ponds with marginal vegetation are included within the revised layout - ponds would be beneficial for bat foraging and invertebrates.	N/A

	Comment raised by DWT	Response	Further actions
	buffers, dark corridors and opens space.		
13	*The invertebrate surveys were undertaken at the end of the survey season, which means spring and early summer species would be unrecorded and therefore the value of the site potentially underestimated. The report considers that the onsite habitats have potential to support further protected and/or notable invertebrate species. Currently, insufficient mitigation has been proposed to address impacts to the invertebrate communities present and it is unlikely that Bombus ruderatus will survive at the site once the habitats are destroyed. Dependent on any revisions to the layout and the provision of meaningful mitigation, further early season invertebrate surveys may be justified to fully assess the assemblage supported on site.*	Response from Baker Consultants: 'The landscaping plan shows areas of 'Wildflower Meadow' which according to the information given is going to be sown using 'Wildflower mixes to be supplied from Emorsgate Seeds' but it does not state what the seed mix type is and thus what the species are within that seed mix.' The final layout (4263 101B Landscape Masterplan) shows the Wildflower Meadow to be Emorsgate EM8 Meadow Mixture. The large garden bumblebee *Bombus ruderatus* (recorded on site) requires long deep blooms and thus foxglove *Digitalis purpurea*, honeysuckle *Lonicera periclymenum*, comfrey *Symphytum spp*., yellow iris *Iris pseudacorus* and marsh woundwort *Stachys palustris* must be included within the landscape planting. As Emorsgate EM8 Meadow Mixture does not have this species composition it was recommended and has been received, that separate seeds are sown on top of the wildflower areas or as plug plants planted in appropriate places. There needs to be a minimum of 50-60 each of foxgloves, comfrey and marsh woundwort throughout the site and at least 10 honeysuckle plants throughout the site to provide a sufficient food resource (pollen and nectar). Expanding the wildflower areas by reducing the 'native scrub' areas would also be beneficial to provide as much habitat as possible for the large garden bumblebee.	During the meeting between TT and DWT on the 1st February DWT expressed concerns over the significance of the large garden bumblebee record. DWT were concerned about the presence of a colony within the site and as such requested further information in the form of complete surveys for the large garden bumblebee. Baker Consultants have been instructed by Wain Homes to complete the required large garden bumblebee surveys within the appropriate survey period (between May and June).

	Comment raised by DWT	Response	Further actions
14	*Reptiles – no reptiles were recorded during the survey, which was undertaken largely in accordance with standard guidance. There is a residual risk that reptiles could use the habitats present in small numbers and shouldn't be entirely discounted, however survey results indicate that the risk is low. The current layout provides very little habitat for reptiles.*	ECoW was not previously recommended within reptile report, only toolbox talk prior to commencement of works. ECoW and supervision for vegetation clearance has been included in a revised report.	N/A
15	*No buffer is provided to Gamesley Sidings LWS to mitigate for impacts of noise, light and other disturbance*	The revised layout demonstrates a 30m buffer along the western boundary of the site.	N/A
16	*Furthermore, the Arboricultural Impact Assessment discusses pruning back the woodland edge trees as they overhang gardens by 75 %. This is not considered acceptable and the presence of a Local Wildlife Site should be factored into the site design. Policy S5 of the Local Plan (Glossopdale Sub-area Strategy) requires Local Wildlife Sites to be*	As above; the revised layout demonstrates a 30m buffer around a large proportion of the site. TT have provided comments which recommend that this buffer is left undisturbed with a relaxed mowing schedule to form a wildlife corridor.	N/A

	Comment raised by DWT	Response	Further actions
	protected and enhanced. The woodland edge habitat is likely of importance to foraging and commuting bats and other wildlife and an unlit buffer zone of semi-natural habitat should be retained along the full length of this boundary. We do not consider the 3 m recommended in the ecology report sufficient to buffer a development of this size and advise at least 10 m. The woodland to the east should also be buffered sufficiently and these buffer zones could also provide scope to retain onsite grassland habitats and reduce the overall net loss		

It is considered that the above responses, appended information and upcoming NVC and large garden bumblebee survey will conclude and provide necessary detail to address DWT comments.

Should any further information be required please do not hesitate to contact me.

Yours sincerely

Jade Armstrong

Consultant

For and on behalf of Tetra Tech Limited

Rachel Kerr

Associate Director

For and on behalf of Tetra Tech Limited

Enclosed

Figure 1 – Site Location

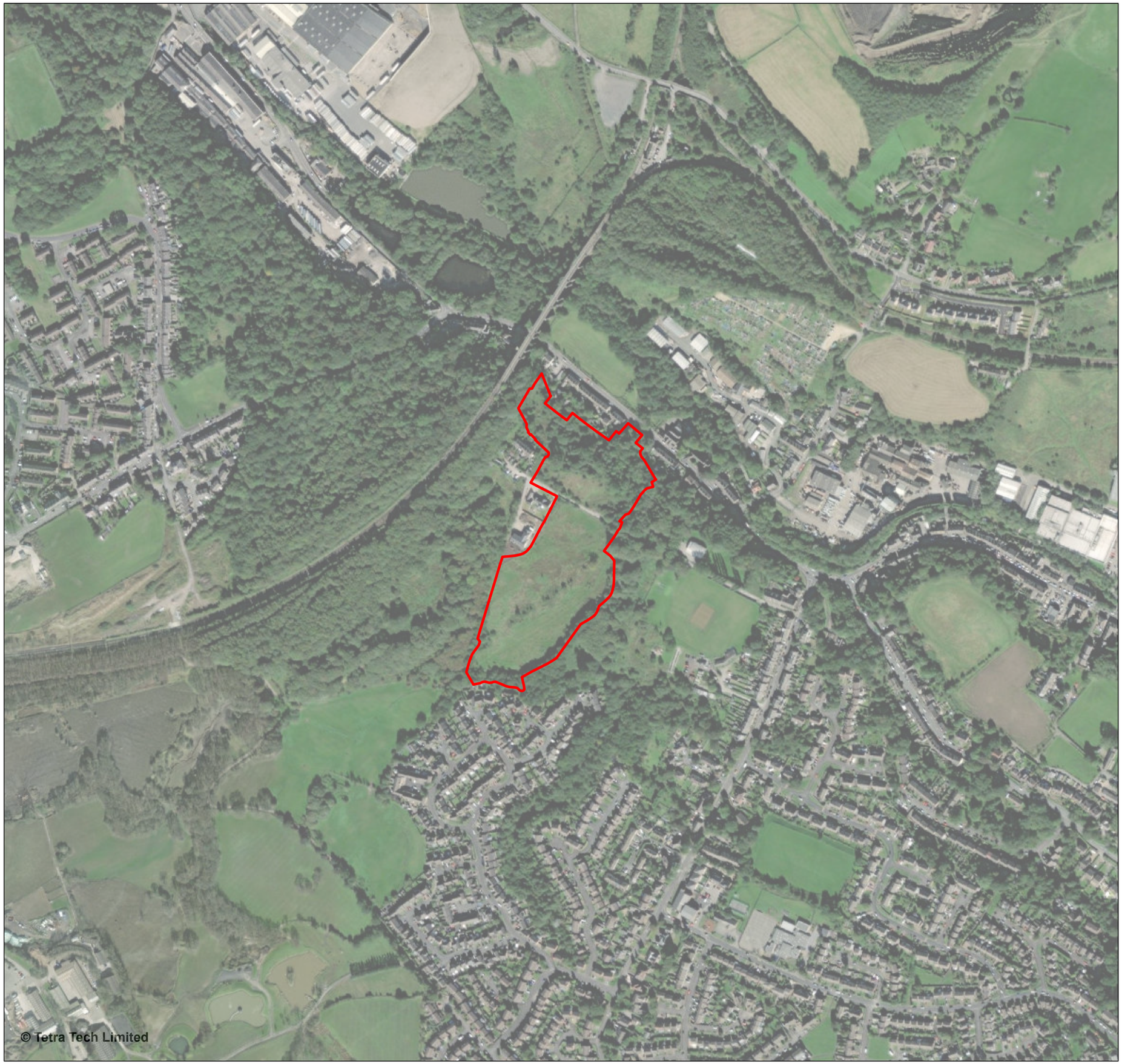
Appendix A – Site drawing: 4263 101B Landscape Masterplan

Appendix B – BNG Metric

Appendix C - 30-year management plan and BNG strategy

Appendix D – Updated Breeding Bird Report

Appendix E – Updated Reptile Report



Site Location Plan

Dinting Vale

Wain Homes

Legend

Site boundary

Notes:

Drawn by: CD

Checked by: JA

Office: Southampton

Figure No. 1

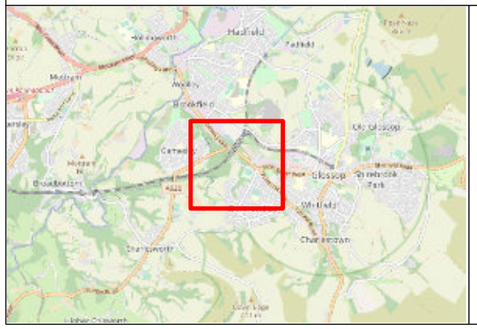
Revision No. A

0 50 100 150 200 250 Meters

Scale 1:5,000 @A3

11 July 2022

NGR: 401924E 394224N



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