



Derbyshire
Wildlife Trust

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 Derbyshire 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 Steven Gunn-Russell
HOLDING OBJECTION

Your Ref: HPK/2022/0456

4th July 2023

Dear Steven,

Proposal: Proposed residential development comprising 100 dwellings including areas of public open space, landscaping and associated works

Location: Land At Dinting Vale Dinting Glossop

Application Ref No: HPK/2022/0456

Derbyshire Wildlife Trust objects to the current proposals for the development of land at Dinting Vale, Glossop, as set out in the documents submitted for the above application.

We have been very careful to review all the relevant material and we have discussed our concerns with the applicant and the Council. However, we do not consider that the current proposals have been able to demonstrate how the development will sufficiently avoid, mitigate and compensate for biodiversity impacts at the site. We therefore do not consider that the development in its current form is able to comply with national and local planning policies relating to the protection and enhancement of Biodiversity, namely the NPPF 2021 and Policy EQ5 of the High Peak Local Plan, along with local policies S1 and S5.

The Trusts main grounds for objection are as follows:

A Lack of Adequate Data

- A copy of the biodiversity net gain metric has not been submitted, which is fundamental to understanding the biodiversity net gain calculations.
- Despite formal requests made by DWT, additional botanical survey has not been provided to confirm that grassland habitats are accurately characterised. There is a sufficient level of doubt regarding the classifications of the grassland to warrant quadrat data to determine the grassland types, in line with the UKHabs Habitat Definitions guide.
- Whilst the onsite and offsite condition assessment data has been provided, there is no accompanying map to show the location of the condition assessment quadrats, nor species lists for the offsite habitats.
- Despite formal requests made by DWT, additional invertebrate survey and assessment has not been provided to determine impacts to the nationally scarce large garden bumblebee recorded on site and design appropriate mitigation.

N.B. We have been informed that the above data has been collected, however it has not been provided at the time of issuing this holding objection.

The Trading Rules of the Biodiversity Metric are not Satisfied

Trading rules are a fundamental principle in the metric, which ensure that higher value habitats are not replaced with lower value habitats. Whilst we cannot see the full details of the metric, the BNG report summarises that there is a net loss of 'medium distinctiveness' habitats, including other neutral grassland, pond and bramble scrub. As such, we do not consider that a true net gain can be claimed, despite the headline figures of +6.32 habitat units / 17.92 % gain. This is supported by clear guidance in the BNG Best Practice Guidelines (CIRIA C776a, 2019) on applying the trading rules.

Loss of a Site which qualifies as a Local Wildlife Site

The application area qualifies as a Local Wildlife Site under botanical criteria, bird criteria and invertebrate criteria. Under current proposals, almost the entirety of the site will be lost to development, with the exception of some areas of woodland that can be retained and/or replanted. It is anticipated that all valuable grassland and other habitats will be lost and it is unlikely that the same invertebrate and bird assemblages will continue to be supported.

Loss of Notable Grassland

Whilst the grassland types on site have not been accurately classified using quadrat data, we know that it comprises marshy neutral – acidic grassland. Based on the existing data available, it is possible that areas of the site could be classed as ‘lowland meadow’, ‘other acid grassland’ or ‘rush pasture’. As such, it is possible that habitats may be recognised as UK BAP Priority Habitat types and be listed as Habitats of Principal Importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. Even without the additional data, the grassland will qualify as Local BAP habitat and qualifies as Local Wildlife Site quality grassland.

It is unlikely that any of the grassland will be retained on site in any meaningful way and an offsite compensation area is proposed. However, there is a significant lack of detail about the offsite conditions and habitat creation proposals. As a result, little confidence has been provided that grassland of equivalent character and value can be created to compensate for that to be lost.

Impacts to Nationally Scarce Bumblebee

No further invertebrate survey data has been provided or meaningful proposals to mitigate the impacts to the nationally scarce large garden bumblebee. This is a Species of Principal Importance (S41, NERC Act 2006) and classed as Nationally Scarce (Nationally Notable) B. It is only the second record for Derbyshire that we are aware of and it has declined by over 80% across its UK range. Insufficient mitigation has been proposed to address impacts to the invertebrate communities present and considered it unlikely that *Bombus ruderalis* would survive at the site once the habitats are destroyed.

The Trust is of course open to further discussions on the points and concerns raised above and we are keen to try to resolve differences wherever possible. Please do not hesitate to contact us to discuss further.

Yours sincerely,

Jo Smith

CEO of Derbyshire Wildlife Trust