



Derbyshire
Wildlife Trust

Sandy Hill, Main Street,
Middleton, Matlock, DE4 4LR

T 01773 881188

E enquiries@derbyshirewt.co.uk

 @derbyswildlife

 Derbyshire Wildlife Trust

Derbyshire Wildlife Trust is registered in
England and Wales, company number 715675
and is registered charity number 222212

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

For the attention of Steven Gunn-Russell
HOLDING OBJECTION V2

Your Ref: HPK/2022/0456

26th 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:

Net Biodiversity Loss and unsatisfied Trading Rules

The metric has now been updated and supplied to the Trust. It reflects the current understanding of the site based on detailed botanical survey work. Even with the current offsite compensation area, a net loss of -2.9 habitat units (4.89%) is predicted. Furthermore, the trading rules are not met and the BNG report summarises that there is an actual net loss of -10.89 units of 'medium distinctiveness' habitats, including other neutral grassland, pond and bramble scrub. Trading rules are a fundamental principle in the metric, which ensure that higher value habitats are not replaced with lower value habitats. This is supported by clear guidance in the BNG Best Practice Guidelines (CIRIA C776a, 2019) on applying the trading rules. To comply with local and national planning policy, and BNG best practice guidance, a net gain should be achieved and the trading rules should be satisfied.

Loss of Habitats of Principal Importance (Section 41 NERC Act 2006)

The grassland types on site have now been accurately classified using quadrat data and this has confirmed the presence of two Habitats of Principal Importance (HPI) (Section 41 NERC Act 2006): Purple Moor Grass and Rush Pasture and Lowland Dry Acid Grassland, along with two other locally important habitats: MG10a *Holcus lanatus* – *Juncus effusus* rush-pasture and S19 *Eleocharis palustris* swamp. Six plant species listed on the Vascular Plant Red List for England (Stroh et al., 2014) have also been recorded at the site.

The HPIs will be lost in their entirety to accommodate the scheme. The metric assesses any loss of such habitat as 'unacceptable loss' and requires bespoke compensation. To date, this has not been provided. Uncompensated losses of HPI are non-compliant with local and national policy.

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.

Two points made in our previous letter have now been removed as a basis for objection:

A Lack of Adequate Data

The additional survey work has been undertaken and results / assessment submitted.

Impacts to Nationally Scare Bumblebee

Additional invertebrate surveys have been undertaken and no further individuals have been recorded. This has allayed our concerns to some extent regarding the significance of the site to this species. We advise that mitigation should be integrated into the onsite and offsite measures.

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