

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

For the attention of Bob at Urban Imprint

Your Ref: HPK/2023/0337

Our ref: DWTHPK491-4

9th November 2023

Dear Bob,

Proposal: Application for Approval of Reserved Matters in relation to application HPK/2019/0316 Seeking approval of appearance, landscaping, layout and scale for the erection of 41 dwellings (Use Class C3) together with associated access, parking and landscaping works

Location: SHIRE HILL HOSPITAL, Bute Street, Glossop, Derbyshire, SK13 7QP

Application Ref No: HPK/2023/0337

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 previously commented on Proposed Layout - Drawing 18.070/09 and various ecology report at the outline stage. We have now reviewed the Proposed Layout - Drawing 01 Rev. 02, the most recent Preliminary Ecological Appraisal (ADAS, 2022) and the Bat Survey Report (ADAS, 2022).

Layout

We do not consider that the current layout has been sensitively designed to avoid impacts to adjacent habitats and species along the northern boundary:

Whilst tree retention seems broadly similar, with some exceptions, we note that dwellings appear closer to the trees and woodland along the northern boundary. We previously advised that a minimum 10m buffer should be put in place between the woodland and the edge of the development and recommended that this should be incorporated into green space within the site and used for additional tree and shrub planting. Tree loss should be replaced at the LPA ratio of 2:1.

A buffer would also safeguard the adjacent offsite barn from impacts of lighting and noise and retain this building as a site for barn owl and potentially roosting bats. Whilst the PEA suggests that the barn owl may not breed in the offsite barn, there has been evidence of this species recorded in the barn over successive years, including an owl in the nest box in the most recent survey. We would encourage a precautionary principle to be adopted and assume it is used regularly and that breeding is possible. This barn also appears to have been used by bats in the past, although we note that the recent PEA states it was re-roofed after a fire. We would recommend that given the historic occupation, roosting provision should be provided within the barn as part of the application and that the value of the barn to protected species should be recognised and considered as part of the scheme design.

Furthermore, the trees along the northern boundary are all incorporated within gardens which puts them at risk from future pressure of pruning and removal. We do not support this and advise that our previous advice should be implemented and the scheme redesigned to incorporate a green space buffer along the northern boundary.

The PEA states that a Biodiversity Net Gain Assessment will be undertaken to demonstrate that a 10 % net gain can be achieved from proposals. We have not yet seen this assessment, which should be integral to the design of the layout and landscaping. This should be submitted at the

earliest opportunity. We would query the classification of the far north-eastern habitats as neutral grassland and mixed scrub, given that they are located within a proposed Local Wildlife Site (pLWS) noted for acid grassland and heathland. The PEA mentions that the area was heavily grazed, and this may have made identification more difficult, however Photographs 18, 19 and 20 suggest that acid grassland and lowland heath were likely present. Currently impacts are not anticipated in this area but if it is used for offsetting works such as enhancement, classification should be accurate.

Landscaping

We have no specific comments regarding the technical detail of the submitted landscaping plans, however these would require amendments given our comments above.

Other

We assume we will be consulted on the discharge of conditions separately. We would advise that our comments are taken on board regarding the development of the site right up to the northern boundary, where sensitive habitats and features are located, as this is likely to be relevant when addressing some of the conditions.

Prior to commenting on a Landscape and Ecological Management Plan at a later date (Condition 26), we thought it would be useful to provide the following information. We note that the LEMP condition attached to the Appeal Decision was based on recommended wording from DWT in 2020. Since then, the British Standard BS:42021:2022 has been published, which advocates for universal nest bricks at a ratio of 1:1 with dwellings. Research has also shown that sparrow terraces have a lower rate of uptake compared to universal nest bricks and that the bricks can be used by a range of species including house sparrow. We would therefore recommend that the sparrow terraces mentioned in the condition wording are swapped for universal nest bricks and that the numbers of these are increased, where possible.

Whilst there is not a condition for a bat licence, it must be understood by the applicant that a licence will be required prior to works on all buildings confirmed to support roosting bats. Update surveys in 2022 identified non-maternity, summer roosts of common pipistrelles in B1, B4 and B5. Survey work in 2019 recorded common pipistrelle and soprano pipistrelle summer roosts in B1, B2 and B3. Depending when the licence is applied for, it is possible that some level of update survey will be required as Natural England typically require data from the most recent survey season. We advise that no works are undertaken to any onsite buildings until all necessary bat survey required is completed and a licence is obtained from Natural England. Trees T1 and T2 were assessed to display high and moderate suitability for roosting bats,

respectively. Whilst no roosts were recorded during nocturnal surveys, appropriate mitigation measures should be included in the Construction Environmental Method Statement (CEMP: Biodiversity) (Condition 25) prior to any tree works or removal. These should also be applied to all trees with low potential, if removal is required.

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 MBiolSci MCIEEM
Biodiversity Planning Officer

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.