

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

For the attention of Pet Twigg

Your ref: HPK/2023/0110

Our ref: DWTHPK704

5th December 2023

Dear Pet

Proposal: CHANGE OF USE OF FIELD WITH OWNERSHIP BOUNDARY OF THE RT MYCOCK SITE TO ALLOW FOR ADDITIONAL CONCRETE BLOCK STORAGE AND ASSOCIATED NEW UNIT

Location: Unit 1, Hunters Way, Harpur Hill Business Park, Harpur Hill, Buxton, Derbyshire, SK17 9JL

Application Ref No: HPK/2023/0110

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

I have reviewed the following documents and reports: -



- Preliminary Ecological Appraisal, Dunelm Ecology August 2023
- NVC Survey, Dunelm Ecology July 2023
- Biodiversity Metric 4.0 Calculation Tool

The proposed development is within part of Ferny Bottom Meadows Local Wildlife Site (ref HP177). This is a non-statutory nature conservation designation applied to the site in 1993. The area affected is c. 0.6 ha (8.45% of the LWS). The LWS was originally designated for unimproved and semi-improved species rich calcareous and neutral grassland communities. The ecological surveys and the Design and Access Statement have recognised the impact on the Local Wildlife Site and that this is potentially a constraint to development.

The surveys of the grassland vegetation have been undertaken at an appropriate time of the year (May and July) and have used acceptable survey methods. The PEA assessed the grassland in May using Phase I habitat survey methods. It identified that part of the grassland was species poor modified grassland and part was moderately diverse 'other neutral grassland'. 32 grassland plants were identified including the following 12 species that are used in the selection of Local Wildlife Sites; meadow saxifrage, common knapweed, common cat's-ear, creeping cinquefoil, common bird's-foot-trefoil, eyebright, tufted vetch, black medick, germander speedwell, oxeye daisy, meadow vetchling and cuckoo flower. According to the PEA the other neutral grassland is found along the verge that forms the western edge of the field. The grassland vegetation here is more diverse than the main field. Some of the above species were noted to be rare, but several are referred to as frequent.

The NVC survey undertaken in July provides a more detailed analysis of the current grassland vegetation community within the field. The results indicate that the existing vegetation is species poor and shows significant signs of agricultural improvement. The NVC survey did not record any of the above LWS 'selection' species that were noted in May. The reasons for this could be the impact of sheep grazing and the rarity of many of these herbs in the grassland. The NVC survey also focused on sampling five quadrats and some species could have been missed.

Nonetheless there is sufficient evidence presented to support the conclusion reached in the NVC report that the grassland vegetation is now modified grassland with perhaps a small strip of 'other neutral grassland' along the road verge. That said the presence of the selection species recorded in the May survey indicate that the grassland still retains greater diversity than many modified grasslands. Some of these species like eyebright are indicative of better-quality grasslands.

In the Biodiversity metric calculation, the grassland is all treated as modified grassland and the baseline value for the field is 2.39 habitat units. The metric includes proposals to create other neutral grassland around the edges of the development. However, despite this there is a net loss of biodiversity of -0.42 habitat units. The need to find an off-site compensation scheme is noted in the PEA, but no firm details have been provided to demonstrate where or how this will be provided.

Conclusion

The development will result in the loss of almost 9% of the Ferny Bottom Meadows Local Wildlife Site. The survey data has determined the grassland vegetation to be for the most part species poor modified grassland. It is likely that the diversity of the grassland vegetation has declined since the early 1990s when it was first designated. The NVC survey concludes that the grassland vegetation does not meet LWS selection guidelines and whilst this may well be true the presence of the indicators noted during the May survey is cause for a degree of caution. For the moment the site is still designated as a Local Wildlife Site and the relevant policies should be applied. In cases where grasslands have declined in diversity and nature conservation value the presence of indicators (as seen here) can provide opportunities for restoration. As the site is a registered Local Wildlife Site it is automatically part of the Local Nature Recovery Network and it is noted that the metric has recognised that the site is formally identified within a local strategy.

It is also clear that there is a net loss of biodiversity due to the development. The layout of the development does not appear to retain sufficient land for a net gain to be achieved on-site and an off-site compensation scheme is likely to be required if a net loss is to be avoided. However, further enhancement may be possible on-site. The details of both on-site and off-site net gain are limited, and further information is required.

Recommendations

The following information is required to understand if a net gain can be achieved:

- Further consideration of how a net gain can be achieved on-site.
- A map confirming the location and configuration of the 0.1238 ha 'other neutral grassland' to be created within the site as part of the development.
- An off-site compensation scheme, as required, with details of where and how a net gain will be achieved and who will deliver the gain together with an updated biodiversity metric 4.0 calculation.

and/or

- An agreement with the Council to provide a financial contribution for the creation or enhancement of habitats that would achieve a net gain. The financial contribution should be commensurate with the unit loss at the site.

Once further information is available for the above, we can provide further comments and advice on any conditions as 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,

Kieron Huston BSc MSc MCIEEM
Biodiversity Planning and Policy Manager

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.