



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 James Stannard

Your ref: HPK/2023/0235

Our ref: DWTHPK717

10th January 2024

Dear James,

Proposal: Demolition of existing Fire Station and Outbuildings and construction of new Fire Station, Smoke House and Tower with associated outbuildings and external works. Work to include a temporary structure to house the fire appliances during construction.

Location: Glossop Fire Station, Whitfield Park, Glossop, Derbyshire, SK13 8LG

Application Ref No: HPK/2023/0235

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

We commented on the previous application (HPK/2021/0663) at this site in 2022. Whilst there are some amendments, most notably the addition of a temporary structure to house the fire appliances during construction, the footprint appears broadly similar.

The same ecological documents have been re-submitted with the current application. The extended Phase 1 habitat survey was undertaken in March 2021. To accord with best practice guidance on the lifespan of ecological data¹, we advise that an update site visit is carried out by an ecologist and a short letter report provided to identify any changes on site since the 2021 survey. It should reconfirm the requirement for a soft felling approach to any trees with low bat roost potential and identify any trees with higher potential than was recorded in 2021. Based on a comparison of the updated arboricultural report and the existing bat information, T77, 88, 89 and 90, appear to require a soft fell approach, however this should be confirmed by a site visit.

We note that an updated arboricultural assessment was carried out in April 2023 to reflect the new proposals. This indicates that tree removal to facilitate proposal has been further reduced since the previous application, which is very much welcomed.

Our previous comments on biodiversity net gain remain applicable. Whilst no biodiversity metric has been provided, given that the majority of impacts appear to be on hardstanding and small areas of amenity grassland and that tree removal is now limited, it may not be strictly necessary in this instance. To enable the LPA to make a robust assessment against local and national planning policies, we suggest that some quantifiable information is provided including numbers and species of trees that will be planted to offset those lost and the total area of woodland to be entered into a Landscape and Biodiversity Enhancement and Management Plan (LBEMP).

The updated lighting design (Ref.: GFS_ESD_XX_XX_R_E_0001 P1) shows a similar level of lightspill to the site perimeters as the previous design, which we approved. We note that all lighting fixtures will be downlighters with no upwards lightspill and that they will be controlled via timeclock and photocells. We query whether they could be turned off at 10 pm rather than 11 pm to create a dark evening environment after sunset for bats and other nocturnal wildlife that may use the surrounding trees / woodland?

The following conditions are likely to be appropriate, however these can be updated (if necessary) after an updated site visit:

¹ Lifespan of Ecological Reports and Surveys (CIEEM, 2019) <https://cieem.net/resource/advice-note-on-the-lifespan-of-ecological-reports-and-surveys/>

Nesting Birds

No vegetation clearance shall take place between 1st March and 31st August inclusive, unless preceded by a nesting bird survey undertaken by a competent ecologist. If nesting birds are present, an appropriate exclusion zone will be implemented and monitored until the chicks have fledged. No works shall be undertaken within exclusion zones whilst nesting birds are present.

Tree Removal

All trees proposed for removal which have been assessed to display low bat roost potential shall be subject to an updated ground-based assessment prior to felling and then removed using a soft-fell approach. Further details and a plan of the trees with low bat roost potential are provided in [REFERENCE UPDATE LETTER REPORT]

Lighting Plan

[Can now be a compliance condition with Ref.: GFS_ESD_XX_XX_R_E_0001 P1]

Landscape and Biodiversity Enhancement & Management Plan (LBEMP)

A Landscape and Biodiversity Enhancement and Management Plan (LBEMP) shall be submitted to, and be approved in writing by, the LPA prior to the commencement of the development. The aim of the LBEMP is to maximise the biodiversity value of onsite habitats and should combine both the ecology and landscape disciplines. It shall be suitable to provide to the management body responsible for the site and shall include the following:-

- a) Description and location of features to be retained, created, enhanced and managed, including new landscaping and existing habitats. This shall include the replacement of trees at a 2:1 ratio and a preference for native species.
- b) Aims and objectives of management.
- c) Appropriate management methods and practices to achieve aims and objectives, including control/eradication of non-native species.
- d) Prescriptions for management actions.
- e) Preparation of a work schedule (including a five-year work plan capable of being rolled forward in perpetuity).
- f) Details of the body or organization responsible for implementation of the plan.
- g) A monitoring schedule to assess the success of the enhancement measures.
- h) A set of remedial measures to be applied if conservation aims and objectives of the plan are not being met.
- i) Habitat enhancements including bat boxes, bird boxes, habitat piles/deadwood.
- j) Requirement for a statement of compliance upon completion of planting and enhancement works.

The LBEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The approved plan will be implemented in accordance with the approved details.

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,

A handwritten signature in black ink, appearing to be 'LDJ' with a long horizontal flourish extending to the right.

Libby Duggan-Jones MBiolSci MCIEEM

Biodiversity Planning Officer

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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.