

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

For the attention of Bob Phillips

Your Ref: HPK/2023/0337
Our ref: DWTHPK491-4a FINAL

28th March 2024

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

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

Further to our response dated 9th November 2023 (DWTHPK491-4) and email correspondence



dated 31st January 2024, we have now reviewed the Revised Layout (Rev. P3) and Landscape Plans (Rev. P07). We have also reviewed the Biodiversity Metric 4.0 (V1, 19th Feb 2024) and the Biodiversity Net Gain Assessment Report (ADAS, February 2024).

Layout

We cannot see any meaningful changes to the current layout compared to the previous iterations that we have commented on. All our comments previously provided in our letter and email (referenced above) still stand. To summarise again, **we do not consider that the current layout has been sensitively designed to avoid impacts to adjacent habitats and species along the northern boundary**. Regardless of whether a net gain is predicted, the mitigation hierarchy must be followed to demonstrate a considered scheme design, which protects features of ecological value. Whilst the northern trees are retained, several require crown reductions due to the proximity to dwellings and all will be incorporated within residential curtilages, providing no future protection from works or removal. This does not demonstrate regard for the safeguarding of these trees and the linear feature / wildlife corridor they provide, linking a potential Local Wildlife Site in the east and a barn previously used by barn owl and bats in the west. The functionality of such features within the local landscape should be recognised, with emphasis placed on retaining and strengthening ecological connectivity and networks. Housing is also proposed right up to the pLWS boundary, increasing the likelihood of light and noise impacts to the wildlife using this site. We recommended a 10 m buffer along the northern boundary as far back as the outline application and we maintain this advice.

Biodiversity Net Gain

Section 3.1 of the Biodiversity Net Gain Assessment Report states that the BNG assessment was based on data collected in 2022. We would point out that the UKHabs methodology was updated in 2023 and that a BNG assessment should use up-to-date survey data obtained in line with the latest guidance. To evidence the classification of the offsite grassland, we would expect to see quadrat data for each of the fields to demonstrate they fall under modified grassland and are suitable for the habitat interventions proposed. The descriptions of some of the wetter fields indicate they could support g3c7 Deschampsia neutral grassland. Any changes to classification would affect the calculations. Given that condition assessment methodology has also changed with V4.0 of the metric, this data should also ideally be collected in the field. We advise that data should be collected in the current survey season to support the BNG assessment and proposals.

Whilst we acknowledge that the offsite grassland does not fall within a formal local strategy, it forms part of a mosaic of semi-natural habitats characteristic of the local area and is located

between blocks of woodland, waterbodies and a locally designated site. Therefore, we consider that the offsite grassland should be allocated medium strategic significance – not in local strategy but desirable.

Onsite proposals include the enhancement of modified grassland to other neutral grassland in good condition. It is not clear if this is feasible as no soil tests appear to have been carried out to demonstrate the nutrient levels present. Species-rich grassland is unlikely to establish in high nutrient soils. We would expect to see soil stripping or inversion on site to reduce nutrient levels to give the best chance of success.

Off-site proposals also include similar grassland enhancement. If these pastures have been subject to high nutrient input from fertiliser or cattle, then again species-rich grassland is unlikely to succeed. The feasibility of the proposed grassland should be considered in more detail, including soil testing and details of ground preparation. These details are required to address the risk of new grassland success, which is one of the Good Practice Principles of BNG (CIRIA, 2016). PH testing is also advisable to inform seed mix choices.

We would query tree planting in the wetter pastures and whether this could reduce the suitability of these for bird species such as snipe, lapwing, curlew etc. Derbyshire Biological Record Centre hold records for such species ~300 m north in proximity to Swineshaw Reservoir.

The creation of woodland in the proposed location would enhance connectivity between existing blocks of woodland and scrub. However, we wish to point out the potential Local Wildlife Site in the north-east and suggest that this could be given more consideration as part of the offsite proposals. This was designated as a pLWS for its lowland heathland and acid grassland. Therefore, planting scattered trees in this area would unlikely be ecologically desirable. Furthermore, it also suggests that the pH of surrounding grassland may be more acidic, although this may have been altered through agricultural improvement. Habitat enhancement in this north-eastern area (including the two fields north of the site and the pLWS) could have potential to enable designation of the pLWS to a LWS, strengthening local ecological networks.

To summarise, whilst a gain is likely to be achievable given the amount of offsite land available, we advise that a) certainty must be provided in the existing habitat classifications to ensure calculations of net gains are accurate and b) the design of habitat creation and enhancement should be more holistic, considering existing habitat features and functionality for local species in order to provide maximum benefits to local biodiversity and enhance ecological networks.

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

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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.