

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

For the attention of James Stannard

Your Ref: HPK/2024/0290

Our ref: DWTHPK738

18th September 2024

Dear James,

Proposal: New Industrial Storage Unit (B8) on land at Bowden Hey Road including associated earthworks, hardstandings, landscaping and provision of future Phase 2 plot

Location: Land Off Bowden Hey Road Chapel-En-Le-Frith

Application Ref No: HPK/2024/0290

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 have reviewed the Ecological Appraisal (Kingdom Ecology Ltd., June 2024), which is well-detailed. The site comprises a remnant area of semi-natural habitat, which is gradually being eroded by the spread of Chapel-en-le-Frith towards the A6. It is likely to support a range



breeding birds, foraging bats and mammals, with potential for herptiles but a low likelihood due to increasing isolation. Habitats comprise a damp grassland mosaic, with scrub and areas of woodland. The grassland supports several species indicative of Local Wildlife Site quality grassland, including orchids, sedges, common knapweed, bird's-foot trefoil, cuckoo flower and angelica. Such habitat is under threat across the High Peak as a result of development.

The report recommends further botanical survey between June and September to ensure a full species list is obtained to verify the habitat classifications and condition assessments used in the BNG metric. We support this recommendation and advise that habitats should particularly be re-assessed against the 'rush pasture' habitat classification, which is a Priority Habitat¹. The site should also be assessed against Local Wildlife Site criteria².

The PEA currently reports that a net loss of -1.67 habitat units (8.44%) is predicted, along with a net gain of +0.35 hedgerow units. However, this does not take into account the further botanical surveys or any of the points raised in this letter. We requested a copy of the metric in July 2024 but this does not appear to have been provided or uploaded to the planning website.

Without a copy of the metric, it is not quite clear how the calculations take into account the future Phase 2 Plot. The post-development habitat map shows the entire eastern half of the site as 'other neutral grassland', albeit with removal of small areas of boundary scrub. This is shown in the Landscape Plan as 'retained grassland and seed mix'. However, the Design and Access Statement shows that this area will contain a plateau for Phase 2 development and also a large topsoil bund / mound. This will require major earthworks and effectively remove the existing grassland and fundamentally alter the topography, drainage etc. It is unclear if the metric calculations accurately reflect the habitat loss in this area. Furthermore, if this area contributes significantly to the onsite gains, it cannot be developed during the 30-year management and monitoring period.

Based on current calculations, a net loss of habitat units is predicted and the PEA suggests that the required units would be sourced from a habitat bank. No further information has been provided on whether a habitat bank has been identified or is able to provide the necessary units. This detail will be required as part of the application, as any offsite measures should be secured via 106 Agreement, once proposals and calculations are finalised.

¹ Priority habitats and species: Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.

² Guidelines for the Selection of Local Wildlife Sites. September 2003 (Revised 2011). Derbyshire Wildlife Trust.

However, whilst we note that part of the site is allocated for development, we would point out that any development should demonstrate how the BNG hierarchy has been applied, which dictates that priority should be given to retaining valuable habitats on site in the first instance, then providing additional onsite gains, before compensating offsite. Ecological surveys should therefore be pivotal in designing a development scheme and undertaken at an early stage. Based on the survey results to date, we would advise that development is limited to the Phase 1 area, with the more species-rich habitat in the north-east of the site retained and managed in the long-term.

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.