



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

For the attention of Rachael Simpkin

Your Ref: HPK/2024/0401

Our ref: DWTHPK758

2nd December 2024

Dear Rachael,

Proposal: 51 dwellings, comprising one-bedroom flats and two- and three-bedroom houses.

Location: Land Off Cottage Lane Gamesley Glossop

Application Ref No: HPK/2024/0401

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 have commented on the proposed development of this site several times in recent years, expressing concern over the proposed removal of Priority Habitat woodland and the proximity to the adjacent Local Wildlife Site and Ancient Woodland.



We most recently responded to application HPK/2024/0154 on 6th August 2024. We have reviewed the current information on the planning web page to determine if our previous concerns have been addressed. Our comments are as follows:

Local Wildlife Site

The impacts to the adjacent Local Wildlife Site have not been minimised and therefore our previous comments are still applicable: *“The proposed development will destroy an area of woodland that connects directly and helps to buffer ancient semi-natural woodland and a Local Wildlife Site. The loss of this woodland in this strategic location reduces connectivity and exposes the ancient woodland to increased disturbance and damage”.*

Species

The same preliminary Ecological Appraisal (E3P, July 2023) has been submitted with this current application and therefore our previous comments remain applicable. In addition, we advised in 2018 that we would expect to see bat activity surveys and tree inspections, should the development of this site be pursued. This work has not been undertaken.

BNG

The same BNG Report (E3P, April 2024) has been submitted with this application. This states that the Statutory Metric has been used and predicts a loss of -6.11 habitat units and gain of +0.23 hedgerow units. However, the only metric we have seen is a copy of Metric 4.0, dated October 2023, which predicts a net loss of -6.73 habitat units (84.76%) and -0.03 hedgerow units (100%).

It is a legal requirement that the Statutory Metric has to be used for all applications subject to mandatory 10% net gain and a copy of this should be provided for review.

It is not clear if the woodland has been correctly classified in the metric. The report classes the woodland as ‘Other woodland; broadleaved’ in Table 1 (and in the copy of the Metric 4.0) but the Priority Habitat ‘Lowland Mixed Deciduous Woodland’ in Section 3.4. Natural England’s ‘MAGIC’ website classifies the site as Priority Habitat Woodland. It is essential that the metric assigns the correct classification, as this will affect the calculations and the compensation requirements.

We advise that woodland should not be classed as retained when it is proposed to be located within gardens. The land use will change to domestic use and there is no future safeguard for habitats within private ownership and no control over management or monitoring. As such, this downplays the potential impacts to this habitat and it would be more accurate to reflect these areas as lost and replaced with garden.

The submitted Biodiversity Metric Report (REF) states that offsite land has been explored to deliver the required net gains but no further information has been provided. Our previous comments relating to woodland loss and delivering a 10% gain are still relevant and have not been addressed. Furthermore, applying the BNG hierarchy¹ is a material consideration and there is an onus on the applicant to demonstrate how this has been applied when designing the scheme. Given that a large proportion of the site comprises Priority Habitat woodland and that virtually none of this will be retained, we would suggest that the scheme is non-compliant in this respect.

In summary, we advise that:

- Insufficient survey work has been carried out for an application which proposes the destruction of Priority Habitat woodland and impacts to protected species have not been fully determined.
- The development of the site will remove the buffer to the adjacent LWS and take housing right up to the boundary of the ancient woodland site.
- A copy of the metric has not been provided for scrutiny and no details of an offsite solution have been provided.
- Proposals are likely to be contrary to Local Plan Policies EQ5, EQ8 and EQ9.

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.

¹ <https://www.gov.uk/guidance/biodiversity-net-gain>