



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: DWTHPK738b

9th December 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

Further to our response dated 21st November 2024, we have been supplied with the Excel copy of the Statutory Metric. We are satisfied with the baseline calculations, however we notice a slight discrepancy in total site area. The metric shows an area of 2.90 ha, whilst the Design and



Access Statement states 3.2 ha. A check of the area using our software returned a size closer to the 3.2 ha figure. This should be updated in the metric.

Currently all baseline habitats are proposed for removal and therefore no habitat enhancement is proposed.

The post-development habitat creation tab reflects the proposed building and hardstanding, along with some limited scrub and tree planting. The remainder (and majority) of the site is reflected as newly created 'other neutral grassland' in good condition.

As per our previous letter dated 18th September 2024, there are two significant problems with this approach:

1. There is a legal requirement for all significant onsite gains to be secured, managed and monitored for at least 30 years. This would include the plateau earmarked for Phase 2 development, rendering it unable to be developed in the short-medium term. Even after the 30-year term has ended, it would be best practice to retain areas of habitat gains to ensure real, meaningful, long-term gains for biodiversity in the region.
2. The current approach requires destruction of the majority of the onsite grassland without any detailed proposals or confidence that the Phase 2 plot would be developed. This does not comply with BNG Hierarchy, which requires impacts to onsite habitats of medium or higher distinctiveness to be first avoided, then minimised. Then the adverse impacts should be compensated for through the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits.

Applying the BNG hierarchy is a material consideration and evidence to show this has been done has not been provided. The surveys have identified grassland of value on site, of borderline LWS quality, and any scheme should aim to avoid or minimise impacts as part of its design. 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 to offset the impacts resulting from Phase 1. This would comply with the hierarchy by avoiding impacts to a large area of medium distinctiveness habitat and offsetting the unavoidable impacts onsite to some extent, through enhancement where possible and additional habitat creation.

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

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.