

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

For the attention of James Stannard

Your Ref: HPK/2024/0190

Our ref: DWTHPK740a

16th January 2025

Dear James,

Proposal: Demolition of existing dwelling and garage with the creation of 7 dwellings

Location: Hillside Woolley Bridge Hadfield Glossop

Application Ref No: HPK/2024/0190

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 letter dated 18th September 2024, a copy of the metric has been submitted, along with a revised BNG Report (V2, November 2024). We also understand that the onsite dwelling has been demolished under a separate Prior Approval Notice. We have had separate



correspondence with the LPA regarding this element of the works and this letter will therefore focus on the BNG element of the scheme.

The BNG assessment has been revised to predict a loss of -2.09 habitat units (52.68%) and a gain of +0.11 hedgerow units. However, we wish to make the following comments on the metric and proposals:

- the proposed hedges will form garden boundaries and therefore cannot be secured in the long-term and will be managed by the homeowner. The metric User Guide states that no additional habitat should be recorded within vegetated gardens. This should be revised in the metric.
- we also note that the entire length of existing hedgerow along the eastern boundary of the site (as surveyed in the initial ecological survey in 2023) has been removed from the habitat baseline. It should be clarified whether this lies within the red line boundary. If this hedgerow will form the eastern boundary of the site, it should remain in the metric.
- as the public open space is proposed to comprise 'other neutral grassland' in good condition, it should be managed with biodiversity in mind, retaining a tall, flowering sward through May to August. This may require a boundary treatment such as railings to prevent unauthorised car parking, children playing etc. Signage would also help to inform residents of its purpose for biodiversity. If the area is required for amenity space, then a flowering lawn mix would be more appropriate and a classification of 'modified grassland' in good condition may be more appropriate.
- the Proposed Site Plan on Page 18 of the BNG Report does not match the most recent Plan on the planning portal.

There is still no confirmed approach as to how the applicant plans to deliver the 10% gains. Based on the current layout and habitat proposals, at least 2.49 habitat units will be required, although additional units may be required when the above amendments are made. These could be delivered on additional land owned by the applicant. This would need to be secured via legal agreement. Alternatively, the units could be purchased from a local habitat bank. If additional land needs to be secured via legal agreement, this needs to be confirmed at this stage in the process. If a habitat bank will be used, final details including an updated metric can be provided as part of the mandatory Gain Plan.

The statutory framework for biodiversity net gain requires a Biodiversity Gain Plan to be submitted and approved by the planning authority to discharge the mandatory biodiversity gain condition, prior to the commencement of development.

Guidance for LPAs regarding Gain Plans can be found here:

<https://www.gov.uk/guidance/biodiversity-net-gain#para25> and the Gain Plan template is here: <https://www.gov.uk/government/publications/biodiversity-gain-plan>

We advise that the following conditions should be attached to any approval:

HMMP – if onsite gains are considered significant

A Habitat Management and Monitoring Plan (HMMP) shall be submitted to, and be approved in writing by, the LPA prior to the commencement of the development. This shall identify the habitats to be retained, created and / or enhanced on the site and specify the appropriate management prescriptions to secure the predicted condition targets, as per the approved biodiversity metric for the application. The HMMP shall also set out a monitoring schedule to ensure targets are met and remedial actions to take if not. Guidance on producing a HMMP can be found here:

<https://www.gov.uk/guidance/creating-a-habitat-management-and-monitoring-plan-for-biodiversity-net-gain>

Construction Environmental Management Plan (CEMP: Biodiversity)

No development shall take place (including demolition, ground works, vegetation clearance and movement of plant, machinery and materials) until a Construction Environmental Management Plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall be produced by an ecologist and shall include the following.

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of “biodiversity protection zones”.
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction to nesting birds, hedgehogs and badgers.
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.

- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Species Enhancement Plan

Prior to building works commencing above foundation level, a Species Enhancement Plan shall be submitted to and approved in writing by the Local Planning Authority. Approved measures shall be implemented in full and maintained thereafter. The Plan shall clearly show positions, specifications and numbers of features, which will include (but are not limited to) the following:

- universal nest boxes at ratio of 1:1, in line with British Standard 42021:2022.
- integrated bat boxes in 3No. of dwellings.
- insect bricks in 3No. dwellings and / or towers in public open space.
- fencing gaps 130 mm x 130 mm to maintain connectivity for hedgehogs in all gardens.

A statement of good practice including photographs should be submitted to the local planning authority prior to the discharge of this condition, demonstrating that the enhancements have been selected and installed in accordance with the above.

Lighting Plan

Prior to the installation of lighting fixtures, a detailed lighting strategy shall be submitted to and approved in writing by the LPA to avoid lightspill to the eastern boundary and safeguard bats and other nocturnal wildlife. This should provide details of the chosen luminaires, their locations and any mitigating features such as dimmers, PIR sensors and timers. Dependent on the scale of proposed lighting, a lux contour plan may be required to demonstrate acceptable levels of lightspill to any sensitive ecological zones/features. Guidelines can be found in Guidance Note 08/23 - Bats and Artificial Lighting at Night (BCT and ILP, 2023). Such approved measures will be implemented in full.

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.