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

For the attention of James Stannard

Your Ref: HPK/2024/0372

Our ref: DWTHPK769

5th February 2025

Dear James,

Proposal: Retrospective creation of an agricultural track and access

Location: Land to West of Upper Blindlow Lane, Flagg

Application Ref No: HPK/2024/0372

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 nature conservation issues associated with the proposed development.

Response

After a review of the information on the planning portal and our Biological Records Database, we advise that amendments are required to the BNG calculations and proposed mitigation, prior to determination.



A BNG Report has been submitted (Estrada Ecology, August 2024) with this application. This assesses the impacts of the track, assuming a previous baseline of agricultural grassland: 'Temporary grass and clover leys'. Tree planting is proposed to deliver +0.19 habitat units (12.48%).

However, after review of the comments from the Peak District National Park, it appears that the baseline grassland has been somewhat undervalued. PDNP indicate that the fields comprised permanent species-rich, semi-improved grassland. A review of our Biological Records Database returns numerous records of flowering plants for the fields, including meadow indicators. A pocket of Lowland Meadow is also mapped approximately 140 m north of the eastern end of the track.

Based on the information to hand, it would seem that 'other neutral grassland' is a more representative habitat classification for the onsite grassland. This is a habitat of medium distinctiveness and therefore requires compensation via creation of other habitats of medium distinctiveness. Whilst like-for-like is not strictly required for 'other neutral grassland' in the metric, PDNP indicate a preference to avoid net loss of such grassland habitats, which we would support. It is likely that the fields were once of greater value prior to historic agricultural improvement and the continued deterioration and reduction of grassland habitat in the area should not be permitted.

Furthermore, PDNP suggest that scrub loss has also occurred and we suggest that the ecologists' study aerial mapping to see if it is possible to gauge the areas of scrub and add these to the metric.

The metric should be updated to take into account this information on baseline habitats and a new proposal put forward to compensate for losses. We suggest that native, species-rich grassland creation and / enhancement would be the preferred approach.

We note that no Ecological Appraisal has been undertaken to identify protected species receptors. This is disappointing and works could have resulted in impacts to species such as nesting birds, reptiles and amphibians. We have reviewed our Biological Records Database and note numerous field ponds in proximity to the track and in the local area, including Greatlow Field Pond Local Wildlife Site, which is directly connected to the track via stone wall. No records of great crested newts exist on our database for these ponds but that does not prove absence and the landscape is ideal for this species. At this retrospective stage, there is no way to determine whether individuals have been directly impacted during works, however we can

conclude that the losses of stone walls would be detrimental to the dispersal of reptiles and amphibians throughout the landscape. We do not support the removal of such features and advise that these should be reinstated.

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,

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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.