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

For the attention of Rachael Simpkin

Your Ref: HPK/2024/0475

Our ref: DWTHPK767

6th February 2025

Dear Rachael,

Proposal: Construction of 4no Units (Units 1-4) for B8 Warehouse & Distribution and 3no Units (Units 5-7) for B2 general light industrial uses, including associated Parking Areas and landscaping.

Location: Land Off Graphite Way Hadfield Glossop

Application Ref No: HPK/2024/0475

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 previously responded to application HPK/2022/0525 at this site, which was supported by numerous detailed survey reports from 2023. Our most recent letter was dated 25th October 2023. We understand that this application was refused.



The current application appears to comprise a very similar layout. We have reviewed the submitted metric and BNG Report (Quants Environmental, November 2024). This is based on an update survey in November 2024 and considers previous survey data for the site.

As part of the previous application, the site was assessed as Open Mosaic Habitat on Previously Developed Land (OMH). Whilst the same component habitats have been recorded, including other neutral grassland and mixed scrub, there is no mention of OMH in the BNG Report. After consideration of the habitat data and the recent site photographs, we would conclude that the site is naturally succeeding to a closed grassland sward with scrub and lacks the bare ground and early successional vegetation elements of OMH. As such, we are satisfied with the way the habitats are assigned in the metric.

We would suggest that the strategic significance is appropriate, except for the lowland mixed deciduous woodland, which should be set as high as it is a Habitat of Principal Importance (NERC Act 2006). This would only make minor changes to the figures and result in a predicted loss of -2.51 habitat units (48.19%).

Currently, no strategy has been put forward to deliver the required 10% gains. Unless the site layout can be revised, offsite land will be required. If additional land can be identified by the applicant for habitat creation and enhancement, this will require securing via legal agreement, including habitat management and monitoring for 30 years. Alternatively, units could be purchased from a local Habitat Bank.

Invertebrate and fungal survey was recommended in our previous letter, however these do not appear to have been undertaken. After further consideration of onsite habitats and the most recent site report, we consider that the site is likely too wet and does not merit specific survey for grassland fungi. Furthermore, the November 2024 survey would have been likely to pick up fungi, if present, which it did not.

The site could support notable invertebrates though and we still support the recommendation for invertebrate survey, as per the PEA (Arbtech, July 2023), at an appropriate time of the year to determine if any protected species or Species of Principal Importance (NERC Act, 2006) or of local conservation concern are present. Survey should be undertaken during spring/summer.

This would ideally be undertaken prior to determination, to enable mitigation and compensation to be fully secured via condition and designed into the scheme where possible. However, dependent on timescales of the application, the survey itself could be secured via condition with

a requirement for mitigation in line with the survey results. This does raise some uncertainty over where the compensation would be delivered, if required, however if the green roofs are incorporated as proposed, this does offer scope for low-growing habitats of interest for invertebrates. The project ecologists should be consulted on this element to determine if sufficient habitat could be created on site to retain invertebrate interest.

If offsite land is secured for BNG compensation, then this could also deliver habitat enhancements for invertebrates. There is less scope for this if units are purchased from a Habitat Bank.

We advise that a strategy should be submitted at this stage to outline how the required net gains will be delivered and how compensation could be provided for invertebrate habitat loss.

Once this additional information has been provided, we can recommend suitable condition wording.

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.