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Wildlife Trust

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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/2024/0496

Our ref: DWTHPK768

18th February 2025

Dear James,

Proposal: Construction of 5 single-storey dwellings and associated works.

Location: Land Off Brown Edge Close Buxton

Application Ref No: HPK/2024/0496

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 have reviewed the Ecological Appraisal and Biodiversity Net Gain Assessment (Rachel Hacking Ecology, January 2024). Multiple points need addressing, prior to determining the application:



The site visit was undertaken in December 2023, which is well outside the optimal survey season to assess a grassland site. Whilst current and previous (2015)¹ survey data indicates that the grassland is species-poor, we cannot advise that a robust assessment has taken place at this time of year. The report should be updated with a site visit in late spring / summer, to ensure that a robust assessment and classification of onsite habitats has been undertaken, in line with UKHabs guidance. UKHabs condition assessment data and evidence of how it meets the UKHabs definition should be submitted.

No consultation was undertaken with Derbyshire Biological Record Centre as part of the desk study. This means that locally available records of protected species and notable habitats and non-statutory sites have not been fully considered, including no consideration of the adjacent Hogshaw Sidings Local Wildlife Site. A desk study should be carried out in line with best practice guidance².

Version 2 of the UKHabs methodology should be used and referenced, rather than Version 1.1.

The report discounts any amphibian breeding habitat within 250 m of the site, however our database shows ponds approximately 270 m to the south-west and 205 m north-east. There is a record of great crested newt ~100 m west and common frog and toad records are also present locally. The site has been ruled out for reptiles, despite DWT recommendations for survey in relation to previous applications. A common lizard record is present 180 m south, with connectivity to site. Other common lizard records are present locally. The site has a rail line along its eastern boundary, which provides an ideal corridor for herptile dispersal. Despite the flaws in the assessment, the report concludes that the site should be cleared under Reasonable Avoidance Methods (RAMs). Once a thorough review has been undertaken of local records, the mitigation recommendations should be reviewed to confirm if RAMs are still appropriate or if reptile survey is required. RAMs could be secured via a condition for a detailed Construction Environmental Method Statement (CEMP: Biodiversity).

The red line boundary of the site does not match the red line boundary of the ecological survey area. The map of the baseline habitats should be updated, along with the metric calculations.

¹ Extended Phase 1 Habitat Survey of Land off brown Edge Road. Rachel Hacking Ecology. 2015.

² Guidelines for accessing using & sharing biodiversity data in the UK. CIEEM. October 2023.

We advise that the strategic significance for the site should be set to moderate (location ecologically desirable but not in strategy) due to its location adjacent to an LWS and within a green corridor along a rail line, connected to other semi-natural habitats in the wider area.

The red line of the application does not follow an obvious boundary in the east of the site and unless the red line will be explicitly fenced off with Heras fencing, we suggest that it is likely that the whole of the field will be affected by ground works, storage of materials and machinery, site compound etc. Furthermore, it is not clear how the area will be treated post-construction. It appears likely that the entirety of the eastern part of the site would form POS. We seek clarity on this, as it may be necessary to include the whole of the field within the red line and, as such, the metric calculations.

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.