

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

For the attention of Rosie Dinnen

Your Ref: HPK/2024/0333

Our ref: DWTHPK747a

26th February 2025

Dear Rosie,

Proposal: Proposed demolition of existing buildings and erection of 9 No. four bedroomed detached dwellings with associated access, landscaping and detached garages

Location: Reliance Garage Glossop Ltd, Turnlee Road, Simmondley, Glossop, Derbyshire, SK13 6PW

Application Ref No: HPK/2024/0333

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 30th September 2024 (DWTHPK747), we have reviewed the updated site plan (Rev. J, Nov. 24), tree protection plan Rev. B, BNG Assessment (V101, January 2025) and PEA (V1, January 25). We have set out our comments below using the same headings as our previous letter:

Woodland

We would typically expect robust justification to downgrade the north-eastern woodland from Priority Habitat woodland, as identified on the MAGIC website, to 'other broadleaved woodland'. However, given that the woodland seems to be largely retained, we will not labour this point. Tree removal is restricted to 1No. Lombardy poplar, which has been accounted for as an urban tree in the BNG metric. We agree with this approach.

Section 4.6 of the BNG report states that, *"Part of the woodland will be included within gardens post development, however with reference to the biodiversity metric user guide, these habitats can be included as retained post-development"*. We fundamentally disagree with this statement as there is no safeguard for the woodland habitat once enclosed within a private garden. It is at risk of removal or degradation and there is no mechanism to monitor the habitat for the 30-year period. That said, after a review of the site plan and the site using Google Street View, it is not clear whether gardens will extend into the woodland or not.

Given the ambiguity regarding impacts to the woodland, we would advise that a clear stand-off is provided between the rear gardens and the riparian woodland in the north-east, which should be marked on the plans. There is a clearly defined area of developed land on site and it seems reasonable to require the proposed scheme to adhere to that. There is no justification to encroach into existing woodland habitat. Local Policy EQ8 requires that: *"through its layout and design, new development responds to the location of existing green infrastructure and ecological networks, supporting their appropriate uses and functions"*.

The current proposal shows rear gardens abutting the top of the bank, immediately adjacent to (or encroaching on) the wooded riparian corridor. This design puts direct pressure on the existing trees through facilitative pruning and future risk of complaints/removal, potentially increases lightspill to the corridor from windows and residential security lights reducing its function to wildlife, and increases risk of garden waste being tipped over fences and introducing non-native species to the wooded corridor.

Watercourse

A watercourse assessment has now been added to the BNG Report. Enhancements are proposed to deliver watercourse units onsite.

Line of trees

Our previous comment has now been addressed.

Bats

There is no summary of the third part bat report referred to in the PEA and this does not appear to be uploaded to the planning portal. The PEA provides no clear recommendations as to whether further survey or mitigation measures are required for Buildings 1a and 1b. Providing no roosts were recorded in 2023, it may be reasonable to demolish Buildings 1a and 1b under supervision but this should be confirmed by the ecologist, having regard to best practice guidance (Collins, 2023).

Riparian mammals

The PEA confirms that no construction will be required within 5 m of the watercourse and as such no further survey is required. If any outfalls are required, these works should be preceded by an inspection by an ecologist and specified in the CEMP: Biodiversity.

To summarise, we are still unclear as to the exact impacts on the wooded riparian corridor in the north-east of the site and consider that the site layout could be more sensitively designed to retain and protect this feature and its functionality. We also request confirmation regarding any requirement for bat survey or supervised demolition from the ecologist.

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.