



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

**For the attention of Bob Phillips**

Your Ref: DOC/2025/0004

Our ref: DWTHPK491-5

10<sup>th</sup> March 2025

Dear Bob,

**Proposal: Discharge of Conditions 6, 16, 19, 21 23, 24, 25, 28, 29 and 31 in relation to HPK/2019/0316 (granted under appeal reference APP/H1033/W/21/3286543)**

**Location: Former Shire Hill Hospital Bute Street Glossop**

**Application Ref No: DOC/2025/0004**

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**

### Condition 21. Badger Survey

The document titled 'Decision Condition 21' won't open from the planning portal. The link should be checked or the document set directly to DWT.



#### Condition 24. Non-native invasive Species Protocol

We have reviewed the Non-native Species Management Plan (ADAS, May 2023). This is based on a 2022 survey and should therefore be updated with a recent site visit to ensure the full extent and all locations of INNS are accurate. The Plan sets out multiple options for management and eradication of each of the species recorded on site but it does not specify which methods will be used. We advise that the Plan should be produced in conjunction with the applicant / developer and the best methods chosen for this particular site. It should state what will be done on the site, not just what the options are. This condition should not be discharged until amendments are made.

#### Condition 25. CEMP: Biodiversity

We have reviewed the Construction & Environmental Management Plan (December, 2024). This does not comprise a CEMP: Biodiversity, as required by Condition 25. We note that condition wording was changed to allow for phased commencement of works and initially this includes demolition of buildings. However, the intention of the original Condition 25 was to ensure measures are secured to safeguard biodiversity features on site and this should be recognised when discharging this condition.

Under the 'Ecological Considerations' section in the CEMP, it states "*Nothing to note on this site*", which is not accurate. This is particularly concerning as multiple bat roosts are present on site and whilst a condition requiring a licence was omitted from the appeal decision, this is nevertheless required and essential to avoid causing an offence under The Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. This was very clearly outlined in our letter dated 9<sup>th</sup> November 2023 (DWTHPK491-4). The ecology reports and our response letters to date should be reviewed and a CEMP: Biodiversity produced. Sufficient information has not been provided to discharge this condition.

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.