



Derbyshire
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 Stuart Talbot

Your Ref: HPK/2025/0013

Our ref: DWTHPK776

12th March 2025

Dear Stuart,

Proposal: Proposed 20m x 40m Sand and Fibre All-Weather Outdoor Arena

Location: Westfield House, High Hill Road, Birch Vale, Derbyshire, SK22 1BA

Application Ref No: HPK/2025/0013

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 BNG Assessment (Arbtech, January 2025), the Preliminary Ecological Appraisal (Arbtech, December 2024) and the submitted metric, dated January 2025.



Habitats and Species

The application area is located in a small complex of fields, adjacent to the River Sett, which could conceivably comprise good quality grassland. The survey was undertaken in December 2024, outside the suitable period for botanical survey, and typically we would advise that this is not reliable enough to form a robust habitat classification. However, Street View imagery from 2019 show the field in use as a campsite, with very short sward grassland. Currently, the fields are managed as horse pasture and are heavily grazed, with areas of bare ground. A fair number of plant species were recorded during the site survey for this application, despite the time of year, and are largely indicative of low-quality grassland, with nutrient inputs. Photographs in the ecology report and the Design and Access Statement (D&A) also support this conclusion and the D&A confirms that the paddocks have been seeded as leys. The grassland is not mapped as a Habitat of Principal Importance on existing habitat on databases. As such, we advise that the classification of other neutral grassland is probably accurate.

The proposed arena is located between 14 m and 20 m from the River Sett. Our main concern regarding protected species would be the effects of any lighting to the River Corridor, which may be used by nocturnal and light-averse species including bats, badgers and otters. No lighting is proposed within this application, however our experience shows that floodlighting is often installed with such arenas and there is scope for a separate application for lighting at a later date. We would be concerned at the prospect of installing floodlighting in this location, close to the riparian corridor of the River Sett, and would suggest that any planning approval expressly prohibits the use of floodlighting in association with the arena. If lighting is essential, it would be worth discussing this with an ecologist and lighting designer at this stage to determine if an acceptable scheme could be designed and avoid problems later down the line.

BNG

The submitted metric predicts a net loss of 0.71 units of other neutral grassland. The post-development tab is not completed and should reflect the proposed area of artificial surface, however this would not alter the net loss calculation. A total of 0.78 units are required to deliver a 10% net gain. However, this is based on a small red line boundary encompassing only the location for the arena.

As per the recommendation in the BNG Assessment report, we advise that careful consideration is given to the extent of the red line and whether widening this would be beneficial. It should be located at least 10 m from the River Sett, otherwise the watercourse module will be triggered,

however including some of the rest of the fields will allow scope for onsite habitat creation and enhancement to deliver onsite gains, in line with the statutory BNG hierarchy¹.

The BNG Assessment report does propose some possible habitat enhancements and we advise that the ecologists use the metric to determine what gains are feasible and inform the best red line boundary for the application. If onsite gains cannot be secured for any reason, habitat works could either be secured as offsite gains or units could be purchased from a Habitat Bank.

Whilst full details of how a 10% gain will be delivered can be provided in the post-determination Gain Plan, we advise that our comments above should be addressed at this stage and we can provide suitable condition wording, once matters are agreed.

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

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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.

¹ <https://www.gov.uk/guidance/biodiversity-net-gain> Paragraph: 008 Reference ID: 74-008-20240214