

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

**For the attention of James Stannard**

Your Ref: HPK/2025/0018

Our ref: DWTHPK777

27<sup>th</sup> March 2025

Dear James,

**Proposal: Demolition of existing storage buildings and erection of 6 two storey dwellings (arranged in a terrace).**

**Location: Storage Buildings To The West Of High Hill Road New Mills**

**Application Ref No: HPK/2025/0018**

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 Protected Species Report (Sensible Ecological Survey Solutions, December 2024), the Draft Gain Plan (07/01/2025) and the Small Sites Metric (07/01/2025).



## Habitats and Species

The site comprises a garage / storage site with 40 garage-type buildings situated on hardstanding. Five small – medium scattered trees are present. Housing is present to the north and east, with woodland present to the south and west.

Garages were assessed to display low bat roost potential in May 2023 and again in an update survey in December 2024. No evidence of nesting bird activity was recorded during surveys, although there is access into the buildings for birds and potentially hedgehogs. Safeguards can be secured via condition.

## BNG

The site is dominated by sealed surface (hardstanding and garages) but achieves a baseline value of 0.46 habitat units due to the five trees. These will all be removed to facilitate the development and even with the creation of vegetated gardens, the post-development value will be 0.05 habitat units, resulting in a loss of -0.4 habitat units (88.66%).

There appears to be very little scope for compensatory tree planting on site and therefore units will have to be purchased from a Habitat Bank. A draft Gain Plan<sup>1</sup> has been submitted, in line with government guidance, and a final version must be submitted prior to commencement of works.

Sufficient information has been provided to determine the application but the following points should be addressed in the metric and Gain Plan, prior to final submission post-determination:

- The Desktop Assessment Tab in the metric states that there are priority habitat on site, which is incorrect and should be amended, although this won't alter the BNG calculations.
- Section 4.6 states that gains will be achieved onsite but this should state a combination of onsite and offsite, as 0.45 offsite habitat units are required.

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<sup>1</sup> Planning conditions are normally imposed on the grant of planning permission under section 70 (1) and section 72 of the Town and Country Planning Act 1990.

By contrast, the biodiversity gain condition has its own separate statutory basis, as a planning condition under paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990. The condition is deemed to apply to every planning permission granted for the development of land in England (unless exemptions or transitional provisions apply), and there are separate provisions governing the Biodiversity Gain Plan.

To ensure applicants are clear about this distinction, the local planning authority are strongly encouraged to not include the biodiversity gain condition, or the reasons for applying this, in the list of conditions imposed in the written notice when granting planning permission. <https://www.gov.uk/guidance/biodiversity-net-gain#para25>

- Sections 4.10 and 7 should be completed.

The following conditions should be attached to any permission:

#### Nesting Birds

No tree or garage clearance shall take place between 1st March and 31st August inclusive, unless preceded by a nesting bird survey undertaken by a competent ecologist no more than 48 hours prior to clearance. If nesting birds are present, an appropriate exclusion zone will be implemented and monitored until the chicks have fledged. No works shall be undertaken within exclusion zones whilst nesting birds are present.

#### Hedgehogs

The interior of all garages shall be cleared carefully by hand of remaining stored materials, in advance of demolition of the structures. If hedgehogs are encountered between March and October, they shall be moved carefully by gloved hand and clean bucket / box to suitable habitat outside the footprint of works e.g. the adjacent woodland. If individuals are encountered during the winter months, they shall be taken immediately to a wildlife / hedgehog rescue facility. A short statement of compliance shall be submitted to the LPA to discharge this condition.

#### Species Enhancement Plan

Prior to building works commencing above foundation level, a Species Enhancement Plan shall be submitted to and approved in writing by the Local Planning Authority. Approved measures shall be implemented in full and maintained thereafter. The Plan shall clearly show positions, specifications and numbers of features, which will include (but are not limited to) the following:

- universal nest boxes at ratio of 1:1, in line with British Standard 42021:2022.
- integrated bat boxes in 3No. of dwellings.
- insect bricks in 3No. dwellings.
- fencing gaps 130 mm x 130 mm to maintain connectivity for hedgehogs between gardens and into adjacent woodland.

A statement of good practice including photographs should be submitted to the local planning authority prior to the discharge of this condition, demonstrating that the enhancements have been selected and installed in accordance with the above.

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.