



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

For the attention of Rachael Simpkin

Your Ref: HPK/2023/0192

Our ref: DWTHPK692c

4th April 2025

Dear Rachael,

Proposal: Construction of 99 dwellings with associated landscaping and engineering works

Location: Land at Hogshaw, Fairfield, Buxton, Derbyshire

Application Ref No: HPK/2023/0192

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

I previously responded to the above application on 4th October 2024 and 18th December 2024. Updated documents have since been received as follows: -



- Biodiversity Enhancement Management Plan (Urban Green, February 2025)
- Biodiversity Net Gain Design Stage Assessment (Urban Green, February 2025)
- Biodiversity Metric 3.1 Calculation (the date is still 13th November 2024, but presumably it has been updated)

In my previous letter (DWTHPK692b – 18th December 2024) I raised several outstanding matters relating to ecology and biodiversity and made recommendations regarding conditions. In light of the reports and documents listed above my further comments are set out below.

Biodiversity Impacts and Biodiversity Net Gain

The Biodiversity Net Gain Design Stage Assessment (Urban Green, February 2025) is an updated version of the earlier assessment and now predicts an 84.96% gain in area habitats and a 19.85% gain in linear habitats and no net change in river units. The report is accompanied by an updated metric. There is a slightly different figure in the metric for habitat gain of 81.12%. The differences relates to the habitat unit gain which in the assessment is 23.51 units and in the metric is 23.02 units. The difference, at least in part is due to changing the target condition of the woodland creation from good to poor. The difference is not hugely significant given that it is still well above 10% but it would be advisable for the applicant's ecologists to correct this at the earliest opportunity.

My previous response reviewed the metric and raised a concern around attaining good condition for some of the proposed new woodland areas. It is noted that the target condition for these woodlands has been changed to 'poor'.

Biodiversity Enhancement Management Plan (Urban Green, February 2024)

It was previously noted that the BEMP and the Ecological Enhancement Strategy overlapped regarding species enhancements for bats, birds and hedgehogs and that the plans differed on several key points. **I note that this information has now been removed from the BEMP and only appears in the Ecological Enhancement Plan.**

I also note that the BEMP includes a **commitment to provide monitoring reports to the Local Planning Authority** at agreed intervals.

Conclusions

As previously stated, the current proposals set out habitat creation and enhancement within the development that in accordance with the Biodiversity Metric 3.1 provide a net gain of +81 to

84%% for habitats and +19.85% for hedgerows. The only slight discrepancy appears to be the differing figures for % habitat gain given in the metric and the Biodiversity Net Gain Design Stage Assessment (Urban Green, February 2025).

The proposals for habitat creation and enhancements are considered to provide an acceptable level of mitigation and compensation for the impact on the Local Wildlife Site (subject to comments below). To some degree the impacts are temporary, and the creation of the pond and associated habitats will be of wildlife benefit.

As previously stated, the LPA is **advised to consider securing the on-site habitat creation and enhancements via a legal agreement due to the significance of the habitats being created and given the negative impact on a non-statutory Local Wildlife Site.**

Recommendations / Conditions

The development will need to be implemented in strict accordance with the following documents and reports where these have already been submitted and do not require further revision:

- Construction Environmental Management Plan: Biodiversity (Urban Green, March 2023)
- Ecological Enhancement Strategy Urban Green, March 2024
- Biodiversity Enhancement Management Plan (Urban Green, February 2025)
- Biodiversity Net Gain Design Stage Assessment (Urban Green, February 2025)
- Biodiversity Metric 3.1 Calculation (as updated)

The following conditions are recommended:

I support the requirement for a condition requiring a detailed Arboricultural Method Statement as per the recommendation from Peak Tree Consultancy unless otherwise resolved.

Lighting

Prior to the installation of lighting fixtures, a detailed lighting strategy shall be submitted to and approved in writing by the LPA to safeguard bats and other nocturnal wildlife. This should provide details of the chosen luminaires, their locations and any mitigating features such as dimmers, PIR sensors and timers. Dependent on the scale of proposed lighting, a lux contour plan may be required to demonstrate acceptable levels of light spill to any sensitive ecological zones/features. Guidelines can be found in Guidance Note 08/23 - Bats and Artificial Lighting at Night (BCT and ILP, 2023). Such approved measures will be implemented in full.

Biodiversity enhancement verification

We would advise the LPA to seek confirmation and evidence that biodiversity species enhancement measures have been fully implemented as part of the development and recommend the following condition: -

Prior to the first occupation of the development or phase, a verification report carried out by a qualified ecologist must be submitted to and approved by the Local Planning Authority. This must demonstrate that the species enhancements have been implemented as per the agreed details (or detail any minor variations), highlight any missing or incorrectly implemented features, and provide remediation measures where necessary.

If you require any further information or wish to discuss any of the comments made, please do not hesitate to contact me.

Yours sincerely,

Kieron Huston MCIEEM
Head of Biodiversity Planning