



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

For the attention of James Stannard

Your Ref: HPK/2024/0496

Our ref: DWTHPK768a

4th June 2025

Dear James,

Proposal: Construction of 5 single-storey dwellings and associated works.

Location: Land Off, Brown Edge Close, Buxton, Derbyshire

Application Ref No: HPK/2024/0496

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

This letter supersedes our draft response submitted on the 28th May 2025, as a copy of the BNG metric has now been provided for review.



Further to our letter dated 18th February 2025, a revised Ecological Appraisal and BNG Assessment (Rev. D) and revised metric have been submitted.

Whilst no update survey visit has been undertaken since our response, the revised report provides additional information about previous survey visits that were undertaken in optimal months. The site has consistently been recorded as poor semi-improved grassland, of which modified grassland is the equivalent in UKHabs. The species recorded in 2025 support this. Taking into account both the current and previous (2015) survey data, we accept the habitat classification.

The red line boundary has been amended in the ecology report to match the site location plan. We understand that housing will be restricted to the west of the proposed access road but significant earthworks will be required in the east due to the sloping nature of the site. Therefore, temporary habitat loss will occur in the eastern part of the site but this can be restored and maintained as green space, significantly reducing the long-term habitat loss. The landscape statement states the following:

“The proposals will effectively turn the upper third of the field into ribbon of residential development. The lower eastern two-thirds of the field will initially appear modified from the extensive earthworks required to create developable land and then green over and become a mixed area of scrub and rougher grass. This will appear similar to its current state”.

It is important to create a cohesive landscaped area on the eastern slope. It is anticipated that the post-development habitats will comprise flower-rich grassland with native scrub, however future management should be considered i.e. will it be possible to mow or cut the slope to maintain the grassland? Whilst we would expect protective fencing along the red line boundary during works, we anticipate that this will be removed upon completion and the entirety of the eastern slope managed in a holistic way. We would encourage the retention of the existing stone wall on the eastern boundary. Mention has been given to various forms of landscape and biodiversity management plans in the ecology and landscape documents, however we would advise that a Habitat Management and Monitoring Plan (HMMP) is secured via condition (in line with mandatory BNG requirements) to deliver the predicted net gains and ensure long-term management and monitoring.

The metric predicts a net gain of +0.95 habitat units (38.76%) and +0.08 hedgerow units (39.30%). The calculations appear reasonable. The target of modified grassland in good condition in the POS is conservative and whilst this helps to deliver >10% gains, we suggest that a target of other neutral grassland would lead to a more diverse sward to benefit local biodiversity (in line with our

comments above). This can be finalised in the post-determination Gain Plan and HMMP and no further amendments are required at this time.

The statutory framework for biodiversity net gain requires a Biodiversity Gain Plan to be submitted and approved by the planning authority to discharge the mandatory biodiversity gain condition, prior to the commencement of development. Guidance for LPAs regarding Gain Plans can be found here: <https://www.gov.uk/guidance/biodiversity-net-gain#para25> and the Gain Plan template is here: <https://www.gov.uk/government/publications/biodiversity-gain-plan>

A data consultation has now been undertaken with Derbyshire Biological Records Centre (DBRC) and amendments to methodology and strategic significance have been made.

Reasonable Avoidance Methods (RAMs) are still recommended for site clearance, to safeguard herptiles.

We advise the following conditions are attached to any permission:

HMMP

A Habitat Management and Monitoring Plan (HMMP) shall be submitted to, and be approved in writing by, the LPA prior to the commencement of the development. If the standard HMMP template is not used, the HMMP checklist shall be consulted to ensure all appropriate information is included. The HMMP shall identify the habitats to be retained, created and / or enhanced on the site and specify the appropriate management prescriptions to secure the predicted condition targets, as per the approved biodiversity metric for the application. The HMMP shall also set out a monitoring schedule to ensure targets are met and remedial actions to take if not. Guidance on producing a HMMP can be found here: <https://www.gov.uk/guidance/creating-a-habitat-management-and-monitoring-plan-for-biodiversity-net-gain>

Reasonable Avoidance Measures

Prior to the commencement of works (including clearance of grassland, refugia piles, scrub or groundworks) a Herptile Method Statement shall be submitted to the LPA, to safeguard any reptiles or amphibians that may use the onsite habitats. This shall include reasonable avoidance measures, seasonal timings and instructions in the event animals are discovered. The Method Statement shall be implemented in full, and a short statement of compliance submitted at the end of site clearance works.

Lighting

Prior to the installation of lighting fixtures, a detailed lighting strategy shall be submitted to and approved in writing by the LPA to minimise lightspill to the eastern green space and 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 lightspill to any sensitive ecological zones/features. The Strategy should refer to Guidance Note 08/23 - Bats and Artificial Lighting at Night (BCT and ILP, 2023) and explain how proposals have been designed in compliance with this document. Such approved measures will be implemented in full.

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 with dwellings, in line with British Standard 42021:2022.
- integrated bat boxes in 3No. dwellings.
- insect bricks in 2No. dwellings.
- habitat piles in eastern part of the site.
- fencing gaps 130 mm x 130 mm to maintain connectivity for hedgehogs in all gardens.

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.