

From: [Libby Duggan-Jones](#)
To: [Declan Cleary](#)
Cc: [Planning \(HPBC\)](#); [Emma Adair](#)
Subject: HPK/2024/0467 Dove Holes, Buxton Road
Date: 16 June 2025 12:58:59
Attachments: [image001.png](#)

Hi Declan,

We have reviewed the most recent information submitted by Ellendale Environmental, comprising the updated PEA (V1.3) and the addendum. We accept the classification of the onsite grassland as modified and have no further comments on the habitat baseline or BNG. 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>

With regards to our last letter response (DWITHPK763c / 8th May 2025), the following comments are still applicable (N.B. These are not really comments for the ecologists to address):

“Any requirements for a site compound etc should be set out and approved, and grassland which can remain entirely unaffected should be fenced off during works (we assume that would comprise the reptile receptor site). We still maintain that there should be no tree planting in the western grassland, other than any essential screening measures and query why the scattered trees are required? A detailed Landscape Plan should be submitted and agreed, including a suitable grassland seed mix, as per our previous letter.”

It is important to confirm that grassland will be protected and enhanced, as proposed, and that logistical issues such as site compound have been considered. We also consider that delivery of a species-rich grassland is the key ecological enhancement at this site and this should not be impacted by scattered tree planting. Trees will affect the hydrology of the soil, cast shade, drop leaf litter/nutrients and make mowing difficult which is essential to maintain a diverse grassland.

Once the above matters are addressed, the following conditions are advised:

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>

Reptile Mitigation Strategy (as per previous letter)

Prior to commencement of works, including any habitat clearance, ground works and movement of machinery or materials, the Reptile Mitigation Strategy V1.0 (Ellendale Environmental, April 2025) shall be updated with the final details of the mitigation approach. These details shall be agreed with High Peak Borough Council and the agreed Strategy implemented in full to safeguard slow worms at the site.

Lighting

Compliance with the most recent approved Lighting Plan should be secured via suitably

worded condition.

Best regards,

Libby.

Libby Duggan-Jones She/Her

Biodiversity Planning Officer

Working Hours: Mon:9-5, Tues:9-5, Wed:9-3, Thurs:9-3



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