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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 James Stannard

Your Ref: HPK/2025/0111

Our ref: DWTHPK784b

22nd September 2025

Dear James,

Proposal: Application for outline planning permission with details of access, appearance, layout & scale (all other matters reserved) for the demolition of existing light industrial building and erection of 3no. dwellinghouses.

Location: 2nd Glossop Scouts Hall Edward Street Glossop

Application Ref No: HPK/2025/0111

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 nature conservation issues associated with the proposed development.



Response

Following comments sent to the Council in July I have now received a bat emergence survey report as below:

- Bat Activity Survey Results Report (Pennine Ecological, August 2025)

I previously commented on the reports below:

- Preliminary Roost Assessment for Bats (Pennine Ecological, June 2025)
- Small Sites Metric (20/06/2025)
- Biodiversity Gain Plan (Draft) (20/06/2025)
- Biodiversity Plans (Baseline and Post Development)

The latest bat survey report has confirmed that the light industrial building to be demolished does not support bat roosts. The report is considered to provide the Council with reasonable confidence that bats will not be adversely impacted by the demolition.

The report has made recommendations regarding enhancements for bats and for sympathetic lighting. I support the recommendations and suggest a condition for lighting and installation of a bat box is attached to any planning permission (see below).

Biodiversity Net Gain

As previously stated in July the information submitted indicates that a small loss of biodiversity (ephemeral vegetation) is likely to result from the development. There are proposals set out within the Draft Biodiversity Gain Plan for the purchase of off-site biodiversity units. Given that the number of units required is small and the habitat affected is low distinctiveness, delivery of the units outside of the LPA area is of lower concern. A total of 0.0481 habitat units will need to be delivered off-site. In this respect the Small Sites Metric and the Draft Biodiversity Gain Plan are in alignment. The Gain Plan includes an Availability Certificate from BNGx that shows purchase of 0.1 habitat units at a cost of £1902. The final Biodiversity Gain Plan will need to confirm the purchase of the units including details of the site. The Small Sites Metric will also need to be updated to include the purchase of the off-site units.

As units are to be purchased from a registered Habitat Bank there will already be a legal agreement in place between the Habitat Bank and a local council or a responsible body. The Council is advised to request details of the existing legal agreement for the habitat bank so that this can be recorded and referred to, if necessary, in relation to future monitoring and reporting. Details of the site registration with Natural England should also be provided.

The proposals include the creation of vegetated gardens on-site. These are not considered to be significant on-site gains and as the gains fall within what will be private ownership cannot be secured for the long term. Therefore, an **on-site habitat management plan is not necessary** in this case.

Conditions and Gain Plan

If approved the applicant will need to provide the Council with a Biodiversity Gain Plan. 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. A revised final small sites metric should be submitted with the Gain Plan.

The following conditions are recommended: -

Habitat Management and Monitoring Plan (HMMP)

As the units will be purchased from a Habitat Bank the Council is advised to request a copy of the Habitat Management and Monitoring Plan for the Habitat Bank and should ensure that it receives monitoring reports so the creation of the off-site habitat can be assessed and reported on as necessary. The standard text for the HMMP condition is as follows:

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>

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:

- 3 integrated swift bricks (universal nest boxes) at ratio of 1:1, in line with British Standard 42021:2022.
- 1 integrated bat box

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.

Lighting

Prior to the installation of external 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. 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.

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,

Kieron Huston

Kieron Huston MCIEEM

Head of Biodiversity Planning

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