



Derbyshire
Wildlife Trust

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

For the attention of James Stannard

Your Ref: HPK/2025/0447
Our ref: DWTHPK809-1

18th December 2025

Dear James,

Proposal: Outline application for up to 180 dwellings, public open space and associated works (all matters reserved except access)

Location: Land at Crossings Road Chapel-En-Le-Frith

Application Ref No: HPK/2025/0447

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 Ecological Impact Assessment (EcIA) (Tyler Grange, October 2025) and metric dated 28th October 2025. We previously provided pre-application advice in our letter dated 20th November 2025.

Sandy Hill, Main Street, Middleton, Matlock, DE4 4LR

01773 881188 • enquiries@derbyshirewt.co.uk

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Wilder by nature

Designated Sites

We anticipate that a Habitat Regulations Assessment (HRA) will be required, given the nature of the proposals and proximity of Peak District Moors (South Pennine Moors Phase 1) SPA, South Pennine Moors Special Area of Conservation (SAC), and Peak District Dales SAC. The proposals also fall within the risk zone for a nearby SSSI, which triggers consultation with Natural England. The EcIA states that a 'shadow' HRA will be submitted to the LPA alongside the EcIA addendum. We would be keen to see the sHRA, which will be completed when the full results of the wintering bird surveys are available, and the comments in this letter may be subject to change.

Lower Crossings Meadow Local Wildlife Site (LWS) is present immediately adjacent to the southern site boundary. This site is designated for its botanical interest, comprising unimproved neutral grassland and wet grassland. No direct access to this site is provided from the proposed development and it does not appear that there is existing public access to this site. As such, an increase in use or disturbance is not anticipated. Section 3.5 of the EcIA states that a habitat buffer will be provided, however this appears limited, with dwellings very close to the northern boundary of the LWS. As a minimum, no gardens should back directly onto the LWS to avoid tipping of garden waste and lightspill and this section of the layout should be revised to accommodate this.

Habitats

The site is dominated by fields of species-poor pasture, including wet areas. Habitats of highest botanical value on site are the hedgerows and the watercourse. Hedgerows qualify as Habitats of Principal Importance under Section 41 of the NERC Act 2006 but they have not been assessed against The Hedgerow

Regulations 1997 and this should be added to the report or EcIA addendum to ensure compliance with these Regs.

Currently proposals require minimal hedgerow removal (25 m), which will be compensated for through onsite planting. Whilst the layout will be agreed at Reserved Matters, we would not expect to see changes that require a significant amount of hedgerow loss, as this would be at odds with Policy EQ9 of the Local Plan.

Two areas (c. 10 m) of Watercourse 1 will be culverted, ~ 53 m will be lost to the development and ~17 m will be replaced with a SuDS basin. Enhancement of the retained watercourse will be undertaken.

We query whether the northern-most field could be enhanced to provide a more species-rich grassland? Whilst this is not required for BNG purposes, it would align with the aspirations and targets in Policy EQ5 and the High Peak Plan for Nature¹.

Species

We agree that GCN are an unlikely receptor for the site but that common amphibians, particularly common toad, could utilise site habitats. The provision of attenuation basins / SuDS features would benefit this species, along with the incorporation of hedgerows, scrub and habitat piles / hibernacula. HPBC's Plan for Nature targets the creation of wildlife ponds in developments and we suggest that either the attenuation basins should hold permanent water or that a wildlife pond should be created in addition to the SuDS features. We also advise that basins are most beneficial when they are not isolated by residential roads, which

¹ <https://www.highpeak.gov.uk/article/7937/Nature-and-Biodiversity>

provide barriers to amphibians and increase mortality. The current layout shows a basin located centrally in the southern area, with limited connectivity to offsite habitats. This could be better located for wildlife and we query whether this could be located adjacent to a boundary or green space in the final layout. As best practice, onsite drainage should utilise wildlife kerbs² to prevent entrapment of common amphibians in gully pots. Best practice measures should be employed during site clearance and construction to be set out in a CEMP: Biodiversity.

No trees with bat roost potential were identified on site. A reasonable level of bat survey effort was undertaken across spring, summer and autumn in 2025. Hedgerow 12 was identified as a key commuting route and Watercourse 1 also showed high levels of activity, likely associated with bats foraging over the seasonally wet feature. Up to 12 species of bat were recorded on site across the survey period and the bat assemblage using the site is considered of regional importance, based on the Bat Mitigation Guidelines (Reason, P.F. and Wray, S., 2025). The impact assessment in Sections 3.17 – 3.19 and proposed mitigation / compensation appears reasonable. Many trees and hedgerows will be retained on site, including H12, and the proposed SuDS basin will provide a new foraging feature. A sensitive lighting strategy will be required, secured via condition.

Six breeding bird surveys were undertaken between April and July 2025. Out of 41 bird species recorded on or near the site, ten bird species listed on either the Red or Amber List of Conservation Concern were recorded as confirmed, probable or possible breeders. None of these comprised ground-nesting species. The breeding bird assemblage is considered of local importance.

² <https://www.aco.co.uk/products/wildlife-kerb>

Six non-breeding bird surveys were carried out between January and March 2025, with the results of six more between October and December 2025 anticipated in an addendum. These surveys are important given the proximity of the site to District Moors (South Pennine Moors Phase 1) SPA. A total of 43 non-breeders were recorded in total. Multiple Red and Amber Listed species were again recorded, along with the Schedule 1 species redwing and fieldfare.

Two of the non - qualifying bird species included within the Peak District Moors (South Pennine Moors Phase 1) SPA citation were recorded during surveys. A total of 32 Eurasian curlew were recorded on a neighbouring field south-west of the site and four common snipe were recorded on site across three survey visits. The wintering bird assemblage is currently considered to be of local importance but we await the results of the October to December surveys before we comment on whether offsite mitigation should be provided.

Whilst we welcome the proposal to enhance 2.31 ha through wildflower seeding, we do not agree that this will benefit ground nesting species, due to the disturbance from the new development. However, this could provide an additional foraging resource if grassland is allowed to go to seed at the end of the summer / autumn each year. New trees and hedgerow enhancement will benefit a wide range of species, although predation and disturbance are likely to increase from people and domestic pets. Seasonal restrictions will apply to vegetation clearance and should be included within the CEMP: Biodiversity.

The CEMP: Biodiversity should also include measures to safeguard badgers, brown hare, hedgehog and nesting birds during construction. Reptiles are considered a low risk and otters and water vole are considered absent from site.

Species enhancements will be expected, as per the NPPF 2024. The proposed 18No. bird boxes are not considered near sufficient and we would expect to see compliance with the British Standard for Integral Boxes (1:1 ratio with dwellings) to be secured via a Species Enhancement Plan condition. Enhancement measures for other wildlife are also expected, in line with the NPPF and Policy EQ5 of the Local Plan. It is our understanding that Barrat Redrow have joined the Homes for Nature Commitment³, which states:

The Homes for Nature commitment will see a bird-nesting brick or box installed for every new home built, as well as hedgehog highways as standard on every new development taken through planning from 1st September 2024 for participating companies.

In addition to integrated nest bricks, boxes and hedgehog highways, homebuilders are encouraged to incorporate additional features, such as bat roosts, insect bricks and hibernacula. Away from the home, nature-led sustainable urban drainage systems and pollinator-friendly landscaping help to make even more homes for nature on new developments.

BNG

Current proposals would deliver gains of +5.40 habitat units (29.05%), +1.51 hedgerow units (12.03%) and +0.64 watercourse units (14.73%) watercourse units. Gains will be achieved through the planting of 98 trees, enhancement of 2.31 ha of modified grassland to other neutral grassland, enhancement of 190 m of hedgerow and 330 m of watercourse.

³ <https://www.futurehomes.org.uk/homes-for-nature>

We advise that the onsite gains should be considered significant and should be secured via a legal agreement and Habitat Management and Monitoring Plan (HMMP), in line with BNG guidance.

Recommended Conditions (in addition to the statutory Biodiversity Gain condition)

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 over the mandatory 30-year period 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>

CEMP: Biodiversity

No development shall take place (including ground works, vegetation clearance and movement of plant, machinery and materials) until a Construction Environmental Management Plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall be produced by an ecologist and shall be based on the measures outlined in the

Ecological Impact Assessment (EcIA) (Tyler Grange, October 2025). The CEMP shall include the following.

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of “biodiversity protection zones”, including the offsite LWS.
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts to wildlife and retained habitats during construction.
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Use of Wildlife Kerbs

Wildlife kerbs, such as the Aco Wildlife Kerb or similar, shall be installed adjacent to all gully pots within the scheme to prevent entrapment of common amphibians in the drainage network. Drop kerbs shall also be included throughout the road network, especially in proximity to SuDS features and the retained watercourse. These features shall be clearly indicated on the relevant technical drawings for highways and / or drainage, prior to approval by the LPA.

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. 50% of the boxes shall have larger entrance holes (30mm x 65mm) to accommodate starlings while the remaining 50% shall feature smaller holes (28mm x 65mm) designed to favour swifts and smaller species, in line with the British Standard.
- integrated bat boxes in 30% of dwellings.
- bee bricks in 30% dwellings.
- fencing gaps 130 mm x 130 mm to maintain connectivity for hedgehogs in all gardens.
- habitat piles and hibernacula, associated with SuDS features and open space.

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 Strategy

Prior to the installation of services, a detailed lighting strategy shall be submitted to and approved in writing by the LPA to safeguard bats and other nocturnal wildlife. This shall retain dark wildlife corridors along retained features and new open space and avoid lightspill to new bat boxes and offsite habitats. This shall be evidenced using a lux contour plan. The Strategy shall include details of the chosen luminaires, their locations and any mitigating features such as dimmers,



PIR sensors and timers. The Strategy shall 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,

[Redacted signature]

Libby Duggan-Jones MBiolSci MCIEEM
Biodiversity Planning Officer
planning@derbyshirewt.co.uk