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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/2024/0496

Our ref: DWTHPK768b

16th April 2026

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

We have previously provided comments on this application in our letter dated 18th February 2025, in which we reviewed the submitted information including the Ecological Appraisal and Biodiversity



Net Gain Assessment (Rachel Hacking Ecology, January 2024). We identified a number of points in the report, which required addressing.

Further to our comments, a revised Ecological Appraisal and BNG Assessment (Rev. D, Rachel Hacking Ecology, April 2025) was submitted, which we commented on in our letter dated 4th June 2025. At that time, we considered that all points had been sufficiently addressed and we recommended a number of planning conditions to be attached to any consent.

We are aware that a local resident's group have submitted additional survey data, including records and videos of bat activity and a video of a foraging barn owl. They also set out their objection to the development of the site, listing their ecological concerns.

Concerns include the lack of updated habitat survey. This is addressed in our letter dated 4th June 2025. Whilst a survey visit during the optimal time of year would be desirable (the most recent one was December 2023) and was initially requested by DWT, the case was made by the ecologists that they had also carried out the survey work at this site in April 2015 and that the findings of the 2023 survey were consistent with that earlier survey. We understand that the field has remained unmanaged for numerous years and that the trend is a decrease in species-richness and an increase in tall ruderal species and rank grasses. The ecologists conclude that:

"It is expected that a re-survey in 2025 would garner the same result as in 2015 and 2023, with the end result being Modified Grassland in poor condition and Sparsely Vegetated Land in moderate condition. Given the history of the site, a re-survey is considered to be disproportionate to the risk of a rare plant species or different habitat or habitat condition being present".

As per our previous letter, we consider that this conclusion is likely accurate and that further survey is unlikely to change the habitat types recorded. As such, we do not consider any further surveys to be necessary prior to determination.

We note that a small goat willow appears to have been omitted from the habitat map. This should be added in to the baseline BNG data and compensated for in post-development treatment of the eastern slope. Given this minor amendment, it would be reasonable to expect this to updated post-determination but pre-commencement, to ensure that accurate BNG figures are reported in the Gain Plan. The post-development landscaping could be secured via condition:

Prior to commencement of works, a detailed Hard and Soft Landscaping Strategy, which includes a comprehensive planting schedule, shall be submitted to and approved in writing by the Local Planning Authority. The soft landscaping scheme shall align with the proposals presented within the Biodiversity Gain Plan and the Habitat Management and Monitoring Plan.

With regards dispersal of reptiles and common amphibians, a condition has already been recommended for Reasonable Avoidance Measures during site clearance. This will reduce the risk to these species, which are protected from killing and injury under wildlife legislation. Retention or recreation of a mosaic of grassland and scrub on the eastern slope will maintain a habitat corridor for wildlife.

In both letters we queried the treatment of the land in the east of the site post-development and highlighted potential issues with the red line boundary not extending to existing boundary features. We advised that all the semi-natural habitats on the slope to the east of the new housing should be managed in a holistic way, post-development, and if necessary the red line should have been amended to secure this. We recommended that the stone wall on the eastern boundary should be retained and that a Habitat Management and Monitoring Plan should be secured for the eastern slope.

It is expected that bats will forage over fields such as the one at Brown Edge Road, however that alone is not reason for refusal of development. Green space will be retained in the east and we have recommended a condition for a sensitive lighting strategy to avoid lightspill to the eastern habitats and rail line. Bat boxes will be secured in the new houses. Similarly, whilst it is regrettable that some losses of foraging habitat will occur for barn owl, foraging habitat is not legally protected. We are not aware of any buildings or trees on site that could support a barn owl nest site and the actual loss of land is relatively small in area. The barn owl is already foraging in proximity to existing houses, so with good quality landscape treatment of the eastern slope and a sensitive lighting strategy, we consider it likely that barn owls are still likely to forage closeby.

Whilst we don't dispute that fields such as the one at Brown Edge Close hold value for local wildlife, there are no reasons for refusal based on local planning policy EQ5. The site is not designated at any level and is unlikely to qualify as a Local Wildlife Site based on the grassland present. The retention of green space adjacent to the rail line is compliant with Policy EQ8 in maintaining a wildlife corridor.

We advise that landscaping should maximise the value of the green space to the east. Bilberry could be included within the planting palette, if soil conditions are suitable, to benefit the bilberry

bumblebee mentioned by the local group. Wildlife enhancements should be secured through the recommended condition in our letter dated 4th June 2025, which will provide homes for swifts, bats and other species.

Yours sincerely,

Libby Duggan-Jones

Libby Duggan-Jones MBiolSci MCIEEM

Biodiversity Planning Lead (North)

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