



Derbyshire
Wildlife Trust

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

For the attention of Alex Bonser

Your Ref: HPK/2025/0440
Our ref: DWTHPK860

2nd July 2026

Dear Alex,

Proposal: Retrospective application for Change of use of approximately 899 Square Metres of adjacent agricultural land to the East to the domestic garden with temporary caravan sited in the garden for additional family living and change of use of existing garden; as an area of 438 Square Metres approximately of garden within the existing boundary of Hull End Farm to agricultural land to the south of the farmhouse.

Location: Hull End Farm , Beet Lane , New Smithy , Chinley , Derbyshire , SK23 6AP

Application Ref No: HPK/2025/0440

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.

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Wilder by nature

Response

Habitats and Species

We have checked our Biological Records Database and can confirm that there are no designated sites or protected species records within or adjacent to the site boundary.

The habitat within the southern parcel, which is proposed for conversion to agricultural land, is described as garden but appears as a field on aerial mapping. Photographs should be provided to demonstrate the habitats present. We cannot open the photograph on the planning portal.

BNG

The application appears part-retrospective. It is my understanding that the retrospective element is exempt from mandatory 10% BNG, however the non-retrospective element should deliver at least 10% gains.

There are multiple issues with the submitted metric, which should be addressed:

- Mandatory 10 % gain does not apply to retrospective applications. Currently, the largest area of land which has already been converted to garden has been inputted into the metric as other neutral grassland. This should just be reflected as garden in the metric, if the change is retrospective as indicated by the application title.
- The metric should be used to calculate the losses /gains that will result from converting the smaller area of existing garden to agricultural land, as this is not retrospective. Any other habitat changes should also be reflected but the applicant should be aware that additional tree or hedgerow planting within gardens cannot be used to achieve gains. Planting in other areas within the red line can count towards gains.
- The type of development should be change of use, not residential as no dwellings are proposed.
- Section 21 has not been completed.



- Section 24 states that the site walkover is only valid until 12/02/26.
- There is no evidence or job title to demonstrate that the person who completed the metric is a competent person.
- Photographs of all habitats reflected in the metric should be provided in the Supporting Information tab.

Whilst it is not mandatory for the Small Sites Metric to be completed by an ecologist, it is desirable and reduces time taken at the review stage. Currently, it does not seem to have been used correctly and needs significant amendments. Engagement of an ecologist can also help to maximise onsite gains and design the optimal red line boundary for the scheme to try and avoid the requirement for offsite units.

Pre- and post-developments plans should be submitted with the metric, clearly demonstrating the baseline habitats and proposed habitats within the red line boundary. We also advise that the retrospective and non-retrospective elements should be clearly defined on the plans.

At least 10% gains should be delivered and trading rules should be satisfied. If this cannot be delivered on site, offsite units will be required.

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

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