



Derbyshire  
Wildlife Trust

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

**For the attention of Richard Wilshaw**

Your Ref: HPK/2026/0141  
Our ref: DWTHPK857

6<sup>th</sup> July 2026

Dear Richard,

**Proposal: Full Planning Permission for the erection of 24 dwellings (Use Class C3), alongside access, car parking, landscaping and other associated works**

**Location: Land At Miry Meadow, Chapel-En-Le-Frith, Derbyshire, SK23 9RU**

**Application Ref No: HPK/2026/0141**

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**

### Habitats and BNG

We have reviewed Version 2 of the Biodiversity Metric Report and Site Walkover (E3P, March 2026). The site was initially visited by E3P in April 2025, with a follow

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**Wilder by nature**

up visit in undertaken in November 2025. These visits were both early and late in the botanical survey season, which is suboptimal for a site which supports grassland.

However, Derbyshire Wildlife Trust are familiar with this site, based on a site visit in June 2023. At that time, the two fields were demonstrably different, with the eastern field being heavily grazed but the western field only lightly grazed. The western field comprised tall sward grassland, which whilst not species-rich, was noticeably marshy in places, with frequent soft rush and 3No. common spotted and 2No. marsh orchids recorded. The area around the pond was dominated by tall herb vegetation, including great willowherb, soft rush, marsh thistle and greater trefoil.

From review of the current ecology reports, it appears that both fields are now managed as short sward grassland, with photographs demonstrating the reduction in marshy, tall herb vegetation. Even in 2023, the onsite grassland was grass-dominated in both fields and we consider it unlikely to meet the criteria for other neutral grassland. As such, we advise that the classification by E3P of modified grassland is likely accurate.

We are pleased to see that trees removed since 2020 have been reflected in the metric. However, we note the comments from the Council Tree Officer and advise that any revisions to layout and the presence of any veteran trees must be reflected in the BNG calculations. Given the advancing age of onsite trees and the presence of ash dieback, we advise that trees are carefully considered in the Habitat Management and Monitoring Plan for the site, with prescriptions for management of standing deadwood or replacement planting in the future. We

would expect collaboration with the Tree Officer to inform the tree retention and management on this site.

The onsite pond is retained, which is welcomed, however we assume that significant works to the pond will be required. We recommend that the pond should be restored to remove the invasive stonecrop and re-establish rich marginal vegetation. The pond should be designed to support permanent standing water. This feature should be surrounded by railings to prevent access by dogs but allow movement of wildlife. We do not advise the current level of tree planting around the pond as this will affect water levels. Instead, diverse grassland should be established with tall herb at the margins. An interpretation board could be added, highlighting the wildlife that ponds can support, such as amphibians, dragonflies and other invertebrates etc. The drainage network on site should incorporate wildlife kerbs adjacent to gully pots to protect amphibians.

The metric as submitted indicates that a net loss of habitat units will result from this scheme. The BNG report does not address the BNG Hierarchy, which requires features of value to first be retained and then onsite gains to be prioritised. The report moves straight to the recommendation for offsite units. It is a legal requirement and a material consideration to comply with the BNG Hierarchy and we advise that additional information should be supplied to demonstrate compliance and justify why further alteration could not be made to the scheme to increase the onsite gains. A reduction of units and the retention of green space in the western field would deliver more onsite gains, buffer retained trees and allow for restoration of marshy grassland for the benefit of local wildlife, delivering a balance between biodiversity and housing.

### Protected Species

We have reviewed the Protected Species Survey report (Dunelm Ecology, February 2026). No evidence of protected species was recorded on site during survey in April 2025. The onsite pond tested negative for great crested newts, however it is likely to support common amphibians including the Priority Species common toad. There is some risk of reptiles, although these have not been considered in the report. The onsite pond, coupled with rough grassland, is suitable for grass snake and there is connectivity to neighbouring allotments, churchyard and grassland habitats. The current level of grazing appears high and this may somewhat reduce suitability of the majority of the site. The site is suitable for hedgehogs, foraging bats and badgers.

The site should be cleared under a detailed CEMP: Biodiversity, which requires staged vegetation clearance to allow wildlife to leave the site. Restoration of the pond should be undertaken under supervision of an ecologist, to include draw down, rescue of amphibians, removal of stonecrop as controlled waste and re-profiling. The mature ash (G4) should be felled in sections, which are lowered to the ground, as a precautionary measure to safeguard roosting bats. Best practice measures should be employed, including ramps in all excavations, careful storage of materials and chemicals, and pollution prevention measures to avoid contamination of the onsite pond.

Enhancements should be secured via condition, including those specified in the report, alongside bee bricks, hedgehog gaps in fencing and hibernacula adjacent to the pond. As previously mentioned, wildlife kerbs<sup>1</sup> should be incorporated into the road network.

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<sup>1</sup> <https://www.aco.co.uk/products/wildlife-kerb>



Once any further revisions have been made and our comments on BNG been addressed, we can recommend condition wording where appropriate.

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]

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