



**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: DOC/2025/0070
Our ref: DWTHPK731-1

20th November 2025

Dear James,

**Proposal: Discharge of conditions 15, 16 and 18 in relation to
HPK/2024/0143**

**Location: Derbyshire County Council Works Department Ashbourne Lane
Chapel-En-Le-Frith**

Application Ref No: DOC/2025/0070

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

Condition 15. Gain Plan

A copy of the metric has been submitted as part of the discharge information. This predicts significantly different gains to the metric we review as part of the application (28th March 2024). Both metrics are labelled as Revision 1, so this should be altered for clarity. The most recent version dated 13th August 2025,

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Wilder by nature

calculates gains of +0.20 habitat units (124%) and +0.09 hedgerow units (33.33%). The trading rules are satisfied.

Revision R2-4 of the BNG Report has also been submitted (E3P, August 2025) alongside the metric to provide additional detail. It seems that the changes in calculations are a result of updated plans. Gains will be delivered through the creation of modified grassland, 16No. small trees and 38 m of native species-rich hedgerow.

Whilst the standard Gain Plan template has not been used, the BNG Report contains the details required and we advise that the condition can be discharged.

Please note that government guidance states the following regarding Gain Plans:

There is a biodiversity gain plan template. It is not mandatory but asking developers to use it could help with standardising the submission of biodiversity gain plan and metric information.

We do encourage the LPA to request that applicants use the [Gain Plan Template](#) as this speeds up review time.

Condition 16. Habitat Management and Monitoring Plan

Whilst the Covering Letter refers to a HMMP, this document does not appear to be uploaded to the planning portal. A copy should be provided for review.

Condition 18. Lighting

We have reviewed the Covering letter and the Lighting Plan, Rev. P03, No. 23328-RID-LTG-XX-DR-E-0001. Contrary to the Covering Letter, lux contours are not

shown on the Plan and lux values do not extend past the interior of the site i.e. they do not show the values at and beyond the boundary vegetation. Whilst we welcome the inclusion of the rear spill guards on the lighting columns, it is not evident how much these will reduce lightspill to boundary and adjacent habitats.

Whilst we note that the lighting will be controlled via photocell and timeclock, there are no details provided as to which hours the lighting will operate.

The external wall mounted luminaire IP66 and column mounted luminaire are both in excess of the recommended 2700K (both are 4000K). Is this essential or could luminaires with lower Kelvin values be used?

These comments should be addressed prior to discharge.

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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Biodiversity Planning Officer

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