

[REDACTED]

From: [REDACTED]
Sent: 09 May 2026 09:38
To: Planning Comments (HPBC)
Subject: Comment Received from Public Access

[REDACTED]

Application Reference No. : HPK/2025/0462 Site Address: Gas Works Site Horwich End New Road Whaley Bridge
Derbyshire SK23 7JZ Comments by: Tom Fairfield and Ali TorpeyN/A

From:
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Old Road
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[REDACTED]

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Submission: Neither
Comments: Dear Case Officer, Mr James Stannard.

We would like to offer the following comments on Preliminary Ecological Appraisal (PEA) and BNG report produced for the site.

Otter.

The size of the buffer zone along a stretch of water will vary depending on how otters use the area. Otters are a semi aquatic mammal with an extensive travelogue that includes land running; some of which will take place well away from watercourses. Seasonal spate waters influence otter use of habitat; examples would be the avoidance of main rivers, or landrunning especially around bridges, when water velocity exceeds the strenght of the otter(s) to swim against it.

Otters will continue in attempts to use historic runways, even if built over.

There is bridge immediatly against the upstream boundary of the site; how this is influencing otter behaviour at the application is not considered in the PEA. There are also further bridges both upstream and downstream in the immediate environs of the application site.

Onsite vegetation and foraging resources will also be influential in the otter use of a watercourse. The BNG calculation seems to propose modifications to the existing habitat along the Randle Carr Brook. without considering the potential impacts of doing so.

The current levels of background disturbance are low. Otters are usually not phased by low levels of disturbance as long as it is not between them and their refuge. During development the levels of disturbance will increase. No nighttime work will to some extent mitigate this. However otters are regularly active in daylight hours. Otters are also quick to investigate changes in their surroundings, the ecologist doesn't consider the implications for their doing so during development.

Uninformed fencing against a watercourse, including otter fencing, can lead to serious adverse impacts on individual otters and wider otter recruitment. Uninformed placement of fences may also have legal implications. The ecologist does not discuss the proposed fencing, we have noted the fence of the opposite bank, which the ecologist has also not discussed in the PEA.

The case officer should not approve this application until he is satisfied that potential adverse impacts on otter have been fully addressed.

Freshwater Habitats

It is unclear as to if the development proposes to discharge grey water through a SUDS to the Randle Carr Brook which is a salmonid watercourse. If so, where is the proposed discharge point?

Bats.

The Randle Carr Brook will almost certainly be providing foraging and commuting resource for bats. The side elevations of no 2 and no 4 houses show windows in the gable ends; suggesting artificial light spill to the Randle Carr Brook from the proposed house type nearest to brook. The application should demonstrate no increase in artificial light spill to the Randle Carr Brook.

The proposed lighting scheme within the PEA is noted as is the proposed installation of bat bricks.

It is a reasonable assumption on our behalf that Dry Ridge Systems, with their associated implications for bats, will be required for the new builds. We shall be interested to learn of the DWT thoughts on this.

Kind regards,

Tom Fairfield and Ali Torpey.

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