



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

For the attention of James Stannard

Your Ref: HPK/2025/0462
Our ref: DWTHPK829a

21st May 2026

Dear James,

Proposal: 6 new dwellings with associated gardens and parking

**Location: Gas Works Site Horwich End , New Road , Whaley Bridge ,
Derbyshire , SK23 7JZ**

Application Ref No: HPK/2025/0462

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 reviewed the revised layout and the Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment (Helen Hamilton Ecology, May 2026). The revised layout includes an 8 m wide offsite buffer strip between the development and the Randal Carr Brook. This is currently proposed to be planted with native

mixed scrub, as BNG enhancement. It will also serve the dual purpose of buffering the Brook corridor from disturbance to some extent.

Otters

Whilst otters are only discussed briefly in the report, records are present from the Randal Carr Brook, and it is very likely that this species commutes along this watercourse, past the northern site boundary. In summary, otters are protected under The Habitat Regulations 2017 (as amended) and The Wildlife and Countryside Act 1981 (as amended) from killing, injuring, capturing and disturbance. Otters are a material consideration when making a planning decision <https://www.gov.uk/guidance/otters-advice-for-making-planning-decisions> .

We advise that a survey of the Randal Carr Brook should be undertaken adjacent to site and for a suitable stretch up and downstream. The required mitigation may differ depending on whether the watercourse is just used for commuting or whether a holt is present close to site.

The provision of a vegetated buffer zone will help to reduce disturbance from the development, however exact details should be refined once a survey has been completed. No lighting should be installed close to the watercourse and a lighting strategy should be secured via condition to demonstrate acceptable levels of lightspill across the site. If first floor windows are proposed on the northern elevation of the house closest to the brook, a window treatment could be considered to reduce glare / lightspill. Measures will be required to prevent otters accessing the construction site at night.

Other species and habitats

Other species constraints can be addressed through the implementation of best practice measures, secured by a condition for a Construction Environmental Management Plan (CEMP: Biodiversity). We welcome the proposals for species enhancements, although advise that nesting opportunities should comprise an integral nest brick per dwelling, in line with BS 42021-2022. Models should be chosen with holes suitable for swift, house sparrow and starling.

Habitats are well-assessed and classified. They are generally of low value, although the ruderal and successional vegetation will have value to invertebrates and other wildlife. The site does not qualify against the criteria for Open Mosaic Habitat on Previously Developed Land.

BNG

A copy of the BNG metric has been submitted, dated 1st May 2026. This records all habitats as onsite, with none of the offsite tabs completed. However, the Proposed Site Plan treats the 8 m buffer zone as offsite i.e. outwith the red line boundary, and therefore baseline and post-development habitats should be entered on the offsite tabs of the metric.

Furthermore, the watercourse module of the metric has not been completed, despite the development being located within 10 m of the Randal Carr Brook. Either the watercourse module needs completing or the site boundary should be revised to pull the red line back from the brook by more than 10 m, in line with BNG guidance.

The strategic significance must be completed based on the adopted Derbyshire Local Nature Recovery Strategy. All baseline habitat should be set to low and the

post-development strategic significance should be based on the measures set out in the LNRS. The Metric User Guide should be referred to for guidance.

The likelihood of ongoing management of the buffer zone should be considered when selecting the target condition. Given the location between the Brook and the northern plot, it seems unlikely that access will be very easy when the scrub develops. I would be cautious of targeting Criteria D and E. It may be more beneficial for otters to allow this to develop into a wide band of dense scrub.

Once the above comments have been addressed, we can recommend condition wording.

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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