



**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: HPK/2025/0462
Our ref: DWTHPK829c

9th September 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

BNG

Further to our letter dated 5th August 2026, a revised metric and BNG Assessment (Helen Hamilton, 25th August 2026) have been submitted. These include the completed watercourse module and appropriate Strategic Significance scores based on the LNRS. The belt of scrub is shown within the red line boundary and

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therefore reflected in the onsite tabs in the metric. Please note the scrub should be shown within the formal red line boundary plan submitted to the LPA.

Net gains of +0.17 habitat units (23.51%) and +0.07 watercourse units (48.18%) will be delivered by the scheme.

The ecological consultant has confirmed that ownership of both banks of the Brook is the same and that the watercourse enhancements should be readily delivered.

Otters

An otter survey was carried out in July 2026, to determine if the banks of the channel adjacent to site or within 50 m upstream and 150 m downstream are suitable for an otter holt. Evidence of otter activity was also searched for.

Whilst we know that otters are present along the Randall Carr Brook, no evidence was recorded during the survey and no suitable locations / features for an otter holt were noted. The banks of the channel are vertical stone and correspondence from the ecologist confirmed that flood debris was present and that any undercutting of walling or trees would be flooded when the water levels rise, reducing suitability for use as a holt.

We consider that the proposed belt of scrub adjacent to the Brook will be sufficient to buffer the Brook from the development. As per our earlier comments, 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 and should be set out in a CEMP: Biodiversity.

The following conditions are advised:

CEMP: Biodiversity

No development shall take place (including demolition, ground works, vegetation clearance and movement of plant, machinery and materials) until a Construction Environmental Management Plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall be based on the recommendations in the Ecological Appraisal and BNG Assessment (Helen Hamilton Ecology, August 2026). It shall be produced by an ecologist and shall include the following.

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of "biodiversity protection zones", namely the Randall Carr Brook.
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction, especially for otters.
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Measures to avoid the spread of invasive plant species.
- g) Responsible persons and lines of communication.
- h) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.

- i) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

HMMP

Prior to the commencement of the development, a Habitat Management and Monitoring Plan (HMMP) shall be submitted to, and be approved in writing by, the LPA. If the standard HMMP template is not used, the HMMP checklist shall be consulted to ensure all appropriate information is included. The HMMP shall identify the habitats to be retained, created and / or enhanced on the site over the mandatory 30-year period and specify the appropriate management prescriptions to secure the predicted condition targets and for the sympathetic management to maintain all retained habitats, as per the approved biodiversity metric for the application. The HMMP shall also set out a proportionate monitoring schedule to ensure targets are met and remedial actions to take if not. Guidance on producing a HMMP can be found here:

<https://www.gov.uk/guidance/creating-a-habitat-management-and-monitoring-plan-for-biodiversity-net-gain>

Lighting Plan

Prior to the installation of lighting fixtures, a detailed lighting strategy shall be submitted to and approved in writing by the LPA to safeguard bats and other nocturnal wildlife. This should provide details of the chosen luminaires, their locations and any mitigating features such as dimmers, PIR sensors and timers. A lux contour plan shall be included to demonstrate acceptable levels of lightspill to the Randall Carr Brook and window treatments shall be considered for windows

directly overlooking the Brook. The Strategy should refer to Guidance Note 08/23 - Bats and Artificial Lighting at Night (BCT and ILP, 2023) and explain how proposals have been designed in compliance with this document. Such approved measures will be implemented in full.

Species Enhancements

The enhancement recommendations detailed in Section 5 of the Ecological Appraisal and BNG Assessment (Helen Hamilton Ecology, August 2026) shall be implemented in full during the course of the development and retained in perpetuity. Evidence that these measures have been implemented shall be submitted to the Local Planning Authority for approval, prior to occupation.

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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