Derbyshire Wildlife Trust

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Derek Stafford
Assistant Director of Planning & Regeneration
Amber Valley Borough Council
PO Box 18
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For the attention of Anne Arkle

Your Ref: AVA/2023/0239
Our ref: DWTAVA1771

24th May 2023

Dear Anne

Proposal: Construction of five bespoke holiday lodges with access, car parking and landscaping

Location: Land At Longwalls Lane Longwalls Lane Blackbrook Belper Derbyshire

Application Ref No: AVA/2023/0239

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 Amber Valley 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.

Comments



I have reviewed the Phase I Survey Report prepared by Morfe Valley Environmental Ltd November 2022. The survey was undertaken at a sub-optimal time of the year for a full assessment of plant species. The survey does not provide full details of the habitats present on site. The proposal is for holiday lodges to be installed in a grassland field, but the grassland vegetation has not been fully described or classified in the ecological assessment.

Conclusions and recommendations

The Council is advised that the ecological information submitted in support of the application does not provide sufficient detail for the Council to be confident about the potential impacts of the proposal. The survey was undertaken in November and the report does not provide sufficient detail regarding the type and biodiversity value of the grassland vegetation.

In addition, the assessment only included a partial desktop assessment as it did not source information from the Derbyshire Biological Records Centre. Important records for protected species may have been missed as a result of this.

Whilst the development proposal and the land take is relatively small it is essential that the impact on habitats and species is clear.

The Council is advised to request a Preliminary Ecological Assessment to be undertaken within the optimal survey period for grassland (ideally between May and August). The survey should provide a complete list of plant species present within the field and quantify the impact of the proposed holiday lodges on the grassland. It would be helpful if a Small Sites Metric was applied to the site so that the losses can be quantified. Measures to address the loss of grassland habitat should be included within the ecology report and should clearly demonstrate a net gain overall.

It seems likely that bats are present in this area and any external lighting could have a negative impact. This issue also needs to be reviewed and mitigation measures clearly set out.



[redacted]

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,

Kieron Huston

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Endnote:

Please see our planning pages https://www.derbyshirewildlifetrust.org.uk/planning for ecological advice on submitting a planning application, finding an ecological consultant and information on mitigation and enhancement.