Derbyshire Wildlife Trust

Sarah Brooks
Head of Planning
Amber Valley Borough Council
PO Box 18
Town Hall
Ripley, Derbyshire
DE5 3SZ

For the attention of Alfia Cox

Your Ref: AVA/2026/0241
Our ref: DWTAVA2355

4th June 2026

Dear Alfia,

Proposal: Erection of 8no. contemporary dwellings (may affect the setting of the conservation area)

Location: Former Ada Belfield House Field Lane Belper Derbyshire DE56 1DE

Application Ref No.: AVA/2026/0241

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.

Response

We have considered the relevant documents submitted as part of the planning application with particular reference to the following:

- Preliminary Ecological Appraisal Report (Elton Ecology, October 2022)
- Daytime Bat Walkover (Morph Ecological Consultants, October 2025)

- Biodiversity Net Gain Assessment (Morph Ecological Consultants, February 2026)
- The Statutory Biodiversity Metric (Morph Ecological Consultants, February 2026)
- Proposed Site Plan (7546–LAT–XX–RL–DP–A–1200–S3–P03)
- Design and Access Statement

It is understood that the application pertains to the development of eight new dwellinghouses.
The site comprises a large, flat-roofed former care home building, which is now derelict, together with associated buildings, areas of hardstanding, modified grassland, introduced shrubs and scattered individual trees. Hedgerows define most of the site boundaries.

We acknowledge that previous ecological survey work was carried out in 2022, pertaining to a Preliminary Roost Assessment and bat emergence surveys. The survey works were associated with an outline planning application for the demolition of the care home building and erection of seven dwellings (AVA/2020/0089).

An updated daytime bat walkover survey was undertaken by Morph Ecological Consultants on 26th September 2026 to reassess the suitability of the building for roosting bats and nesting birds, given the time elapsed since the previous surveys. We support the conclusion that the main building is largely unsuitable for roosting bats, with only a limited number of potential roosting features identified. Taking into account the absence of roosting bats during the 2022 surveys, the limited features recorded during the 2025 daytime walkover, and the subsequent installation of security boarding to the building, we consider that further bat survey effort would be disproportionate in this case. The demolition phase of the

development (AVA/2026/0187) should adhere to a Precautionary Working Method Statement (PWS), secured as condition of planning.

Best practice measures should be adhered to in relation to nesting birds and a sensitive lighting scheme should be secured via condition in order to safeguard bats and other nocturnal wildlife.

Biodiversity Net Gain (BNG)

We have reviewed the Biodiversity Net Gain Assessment and metric (Morph Ecological Consultants, February 2026). Proposals will result in the loss of modified grassland, introduced shrubs, individual trees, and non-native hedgerow. Limited areas of public open green space will be utilised for modified grassland creation and tree planting.

It is noted that the native hedgerow to the west of the site is to be retained as part of the scheme. Whilst we encourage the retention, the rules regarding habitat retention, as stipulated by current user guidance should be followed:

Where the condition of retained habitat cannot be maintained or enhanced over the project timeframe, you should:

- *record the habitat as lost*
- *record the same area and habitat type as created in a lower condition*
- *set the 'habitat created in advance' function to 30 plus years*
- *provide ecological reasoning in the user comments*

Conditions

Nesting Birds

No tree, scrub or hedgerow clearance shall take place between 1st March and 31st August inclusive, unless preceded by a nesting bird survey undertaken by a competent ecologist no more than 48 hours prior to clearance. If nesting birds are

present, an appropriate exclusion zone will be implemented and monitored until the chicks have fledged. No works shall be undertaken within exclusion zones whilst nesting birds are present.

Species Enhancement Plan

Prior to building works commencing above foundation level, a Species Enhancement Plan shall be submitted to and approved in writing by the Local Planning Authority. Approved measures shall be implemented in full and maintained thereafter. The Plan shall clearly show positions, specifications and numbers of features, which will include (but are not limited to) the following:

• universal integrated nest bricks / swift bricks at ratio of 1:1, in line with British Standard 42021:2022, erected at eaves level, avoiding southern elevations.

• 8 x integrated bat boxes in new dwellings, erected at eaves level, favouring southern elevations.

• 8 x bee bricks in new dwellings.

• fencing gaps 130 mm x 130 mm to maintain connectivity for hedgehogs in all gardens.

Prior to occupation, a statement of good practice including photographs should be submitted to the local planning authority to fully discharge this condition. This shall clearly demonstrate that the enhancements have been selected and installed in accordance with the above.

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,

Holly Fowler

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