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 Rebecca Godson

Your Ref: AVA/2026/0259
Our ref: DWTAVA2352a

26th June 2026

Dear Rebecca,

Proposal: Removal of existing sprinkler tank and sprinkler pump house and replace with new sprinkler pump house and tank.

Location: Lubrizol Ltd The Knowle Nether Lane Hazelwood Belper Derbyshire DE56 4AN

Application Ref No.: AVA/2026/0259

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

Further to our letter dated 17th June 2026, we have been made aware of a Preliminary Ecological Appraisal prepared by Turnstone Ecology (November 2026). Please find our updated comments below:

It is noted that a UK Habitat Classification Survey, Protected Species Assessment, Habitat Suitability Assessment and Preliminary Bat Roost Assessment were conducted on 31st March 2025. A subsequent eDNA survey was conduced on 2nd June 2025.

The two ponds located ~75m from site were confirmed to support Great Crested Newt (GCN) based on eDNA survey. The buildings on site were assessed to hold 'Negligible' bat roosting suitability. No evidence of badger was recorded within the site or 30m zone of influence. Due to the small scale of the proposals and sub-optimal habitat to be impacted, further surveys prior to the determination of the application are considered to be disproportionate. However, we support the need to undertake a pre-commencement badger survey, due to the transient nature of the species.

We support the mitigation measures as outlined in Section 4 of the PEA to safeguard protected species and habitats during the clearance, construction and operational phases of the development.

Biodiversity Net Gain (BNG)

We have reviewed the Small Sites Statutory Metric prepared by Les Witten (March 2026) and the pre and post development habitat maps produced by Joe's Blooms.

The metric details that the proposals result in the loss of developed land sealed surface, artificial unvegetated unsealed surface, ruderal / ephemeral vegetation and individual trees (two small and one large). On-site gains relate to the creation of modified grassland, mixed scrub, tree planting and native hedgerow creation.

There are notable discrepancies between the baseline habitat plan in the PEA prepared by Turnstone Ecology and the plan produced by Joe's Blooms. The BNG assessment should reflect the site's accurate baseline,

which is considered to be the survey undertaken by Turnstone Ecology. The calculations should therefore be revised accordingly.

Additionally, it should be noted that when planting new trees, post-development size class is determined by the DBH of the tree at the time of site-planting. You should record newly planted individual trees as 'small' (this includes trees planted with a DBH less than 7.5 cm). Only assess a newly planted tree as 'medium' size or above if they meet DBH criteria at the time of site-planting (greater than 30cm and less than or equal to 60cm).

You should not:

- record natural size increases of retained trees within post-development sheets
- record natural size increases of planted trees within post-development sheets

Created trees should be recorded as 'small' in the metric, in line with current guidance.

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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