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/2026/0264
Our ref: DWTAVA2373a

23rd July 2026

Dear Rebecca,

Proposal: Application for outline planning permission to subdivide existing plot into 2 to create proposed new 3 bedroom detached house

Location: Elfin Lodge 108 Ashbourne Road Cowers Lane Belper Derbyshire DE56 2LF

Application Ref No.: AVA/2026/0264

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 reviewed the submitted information inclusive of the Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment and metric prepared by Steven Pagett Ecological Services (June 2026) and have the following comments to make:

It is understood that the application pertains to the development of a single 3-bedroom detached dwelling on a parcel of land north of Ashbourne Road, Belper.

The PEA has been informed by a UK Habitat Classification Survey and protected species assessment undertaken on 23rd May 2025. The site comprises vegetated and unvegetated garden bound by a non-native ornamental hedgerow to the west and south. A small section of ornamental hedgerow is present along the eastern boundary.

Based on the proposals and the information submitted, we advise that the application is considered low impact and unlikely to have a substantive adverse effect on biodiversity. However, we advise that precautionary measures should be followed during site clearance and construction works to minimise impacts on hedgehogs, badgers and breeding birds.

Biodiversity Net Gain (BNG)

We have reviewed the BNG Assessment and metric prepared by Steven Pagett Ecological Services (June 2026). Proposals will result in the loss of garden, equating to a -8.10% of habitat units. A no-net loss of hedgerow units is predicted.

It is our understanding that the application does not qualify under any exemption, so a minimum of 10% net gain is required, in line with the Environment Act 2021. These losses cannot be offset within the site boundary and therefore an offsite option will be required.

It is understood that the applicant intends to offset the losses via purchase of habitat and hedgerow units from a habitat bank. Given that the number of units required are minimal, we would not expect to see further details at this stage. The

finalised Gain Plan should demonstrate how the development will achieve a +10% net gain alongside the final excel version of the metric.

Given that the onsite gains will be minor and restricted to a private garden, a Habitat Management and Monitoring Plan (HMMP) is considered disproportionate. A landscape plan could be secured by the LPA, and we would encourage the inclusion of native or beneficial garden planting, such as small trees and pollinator-friendly shrubs, where possible.

Conditions

Best practice measures

All works should be undertaken in a manner by which to safeguard hedgehogs and nesting birds. Immediately prior to commencement, the footprint of works should be checked for any wildlife. If any active bird nest is discovered, works must be delayed until chicks have fledged. Active nests are protected by law.

All excavations shall be covered overnight or else have an escape ramp installed to prevent entrapment of badgers, hedgehogs and other wildlife. All pipework greater than 150 mm shall be blanked off at the end of the day and chemicals shall be stored securely. Topsoil mounds shall be checked for badger activity prior to removal or re-use.

Biodiversity Enhancement Plan

Prior to building works commencing above foundation level, a Biodiversity 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:

• 1 x integral universal nest box / swift brick in new dwelling, erected at eaves level, avoiding southern elevations.

• 1 x integral bat box in new dwelling, erected at eaves level, favouring southern elevations.

• 1 x bee brick in new dwelling

• ecologically beneficial planting

• fencing gaps 130 mm x 130 mm to maintain connectivity for hedgehogs

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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