Derbyshire Wildlife Trust

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

For the attention of Laura Anthony

Your Ref: AVA/2026/0463
Our ref: DWTAVA2413

7th October 2026

Dear Laura,

Proposal: Outline application for proposed redevelopment of Fodder Rooms by erection of six dwellings

Location: SEALS FODDER ROOM High Street Swanwick Alfreton Derbyshire DE55 1AA

Application Ref No.: AVA/2026/0463

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 (ProHort, July 2025)
- Biodiversity Net Gain Matrix Report (ProHort, July 2025)
- Biodiversity Net Gain Assessment (ProHort, February 2026)

- The Statutory Biodiversity Metric (ProHort, February 2026)
- Condition Assessment Sheets (ProHort, February 2026)
- Bat Survey Report (Brindle & Green, June 2026)
- Arboricultural Impact Assessment (Brindle & Green, May 2026)

It is understood that the application pertains to the development of six dwellings. To facilitate works, the existing commercial buildings are to be demolished.

The PEA presents the results of an extended UK Habitat Classification undertaken on 1st July 2026. We are pleased to see that a full desk study has been carried out to inform the assumptions made. A Preliminary Bat Roost Assessment (PBRA) was conducted alongside the PEA, specifically targeting the buildings on-site.

The site comprises developed land sealed surface, modified grassland, and ground level planters. Native hedgerows are located along the southern boundary. No priority habitats are present within the site or immediately adjacent to. Most of the habitats are of low ecological value. However, the native hedgerows are of notably higher value, and we encourage the retention of this habitat where feasible. We support the controlled removal of the cotoneaster located to the east of the site.

The main species constraints relate to roosting bats and nesting birds. Buildings B1 and B4 were assessed to hold 'low' Bat Roosting Potential (BRP). Buildings B2, B3 and B5 were assessed to hold 'negligible' BRP.

A single dusk emergence survey was carried out on B1 and B4 by Brindle & Green on 21st May 2026 to determine the presence / absence of roosting bats. No bats were recorded to emerge or re-enter the buildings and are therefore considered to be absent. No further survey works or licencing is required.

We advise that sufficient information regarding bats has been submitted to enable the Local Planning Authority to reach an informed decision in accordance with

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Circular 06/2005 and to discharge its duty in respect of the requirements of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

Biodiversity Net Gain (BNG)

We have reviewed the BNG Assessment and metric prepared by ProHort (February 2026). Proposals result in the loss of all developed land sealed surface habitat to facilitate the development. As far as we're aware, it appears that no semi-natural habitat will be lost. However, the baseline habitat map in the BNG report and baseline plan in the metric do not match. The ground level planter and modified grassland to the north-east of the site do not appear to have been accounted for in the calculations. Additionally, an additional length of hedgerow along the southern boundary should be accounted for in the metric.

It may be that if all semi-natural habitats can be retained outside of the private gardens of the new dwellings, that the de minimis exemption would apply and mandatory BNG would not be required. This point should be clarified.

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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