Derbyshire Wildlife Trust

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

For the attention of Laura Anthony

Your Ref: AVA/2026/0602
Our ref: DWTAVA2432

9th November 2026

Dear Laura,

Proposal: Erection of substation

Location: Land At Lubrizol, Knowle Farm Nether Lane Hazelwood Belper Derbyshire

Application Ref No.: AVA/2026/0602

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:

- Ecological Appraisal Report (BSG Ecology, October 2026)
- Biodiversity Gain Report (BSG Ecology, October 2026)
- The Statutory Biodiversity Metric (BSG Ecology, October 2026)

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It is understood that the application pertains to the development of substation at the land at Lubrizol, Hazlewood.

The PEA presents the results of an extended habitat survey conducted in June 2026. We are pleased to see that the ecological assumptions are supported by a full desk study. It is noted that an update site visit took place on 28th August 2026 following changes to the scheme design.

The site contains sealed developed land, modified grassland and mixed woodland, with a section of native hedgerow to the west. Most habitats on site are considered to be of low ecological value, although the native hedgerow qualifies as a Habitat of Principal Importance. The development will result in the loss of hedgerow, woodland and modified grassland. We support the PEA's conclusion that, given the development's small scale and its effects on predominantly low-value habitats, the works would not have a significant adverse ecological impact.

The main species constraints concern nesting birds, hedgehogs, badgers and great crested newts (GCN). GCN are known to occur in two ponds approximately 200m south-east of the site. The proposals would result in a small loss of suitable terrestrial habitat within 100 m of these ponds. Although no mitigation strategy has been provided, we support the options outlined in the PEA. **The final mitigation strategy should accompany the application.**

Biodiversity Net Gain (BNG)

We have reviewed the Biodiversity Gain Report and metric (BSG, October 2026). Proposals will result in the loss of modified grassland, mixed woodland and a section of native hedgerow. Habitat creation pertains to small areas of good condition modified grassland. The proposals result in the loss of -0.15 habitat units (-18.39) and -0.02 hedgerow units (-100.00%).

The applicant intends to purchase habitat units to offset the losses, but there may be scope to create hedgerows on site. Opportunities for on-site habitat enhancement or creation should also be considered. The applicant should clarify the final strategy and ensure it complies with the biodiversity gain hierarchy.

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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