



Derbyshire
Wildlife Trust

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 Derbyshire Wildlife Trust

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For the attention of Katie Moriarty

Your Ref: DMPA/2019/0967

Our ref: DWTSOU652

21st October 2019

Dear Katie,

Proposal: Change of use from agricultural land to school playing fields (use class D2)

Location: Paulet High School, Violet Way, Burton on Trent, Staffordshire, DE15 9RT

Application Ref No: DMPA/2019/0967

Thank you for consulting the Derbyshire Wildlife Trust with regard to the above planning application. I am responding as the Biodiversity Planning Officer responsible for work relating to the Service Level Agreement, which South Derbyshire District 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.

The application seeking permission for the change of use from agricultural land to school playing fields is supported by a Preliminary Ecological Appraisal prepared by Elite Ecology dated April 2019. The ecology appraisal is based upon a site visit conducted on 16th January 2019. The appraisal identified the site to comprise arable land bounded by hedgerows with trees. It is noted that the ecology appraisal has not included a specific assessment of the
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hedgerows. In the absence of a specific assessment it is not possible to be confident that none of the hedgerows are “important” hedgerow. Such an assessment is lacking and needs to be provided. From consideration of the photographs included in the report the hedgerows that bound the site appear to be well-established native hedgerows that meet the definition of priority habitat (Habitat of Principal Importance). This has not been recognised within the ecological appraisal which has also failed to determine the extent of hedgerow loss that will be required by the proposal both in terms of enabling access to the proposed playing fields and also to enable the installation of the 2m high weldmesh perimeter fencing. To accord with national (NPPF) and local planning policies (BNE3 and BNE7) relating to biodiversity it is important that there is no net loss of hedgerow priority habitat as a result of the proposal which should be clearly demonstrated within the submitted supporting information.

The ecological appraisal and the tree survey report both identify that some of the trees possess features with potential to support roosting bats. We are aware that at least one tree is proposed for removal. Depending upon the location of the potential bat roost features, the installation of the 2m high weldmesh fencing could result in disturbance to roosting bats through impeding access to roost features. Further survey work for bats is therefore required in the form of activity surveys as recommended in section 5.3.3 of the Preliminary Ecological Appraisal with the results provided prior to the determination of the application in line with the requirements of the Conservation of Habitats and Species Regulations 2017.

Although the section 4.2.4 of the preliminary ecological appraisal recognises that the hedges and trees contain the potential to support nesting birds, no consideration has been given to the use of the site by ground-nesting priority bird species, such as skylark. Such information is lacking and needs to be provided.

Overall, in the absence of sufficient information in relation to hedgerow impacts and mitigation, roosting bats and use of the site by ground nesting priority bird species we advise that there is insufficient information to make an informed assessment of the level of ecological impacts associated with the proposed development and to advise the local planning authority accordingly as to whether the proposal complies with legislation and policies relating to biodiversity.

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,

Trevor Taylor

Trevor Taylor

Biodiversity Planning Officer

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