



Derbyshire
Wildlife Trust

Sandy Hill, Main Street,
Middleton, Matlock, DE4 4LR

T 01773 881188

E enquiries@derbyshirewt.co.uk

 @derbyswildlife

 Derbyshire Wildlife Trust

Derbyshire Wildlife Trust is registered in
England and Wales, company number 715675
and is registered charity number 222212

Steffan Saunders
Planning Services Manager
South Derbyshire District Council
Civic Offices
Civic Way
Swadlincote
Derbyshire
DE11 0AH

For the attention of Steven Mott

Your Ref: DMPA/2021/1277

Our ref: DWTSOU664-1

29th November 2021

Dear Steven

**Proposal: Approval of reserved matters (layout, scale, appearance and landscaping)
pursuant to outline permission ref. DMPA/2019/1143**

Location: Land At SK2531 3702, Lucas Lane, Hilton, Derby

Application: DMPA/2021/1277

Thank you for consulting the Derbyshire Wildlife Trust with regard to the above reserved matters 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.

We have considered the following information;

- Planning Layout M037/PL/01 Rev H
- Landscape Structure Plan M3429-PA-01-V03
- Biodiversity Offsetting Technical Note Rev B FPCR July 2021
- Great Crested Newt Survey Prime Environment February 2019
- Ecological Impact Assessment Prime Environment March 2019

It is noted that the submitted Biodiversity Impact Assessment provided in the Biodiversity Offsetting Technical Note Rev. B prepared by FPCR dated July 2021 has been completed using the Defra 2.0 metric. We are aware that the metric has now been superseded by the Defra 3.0 metric and we therefore advise that the calculation should be re-run using the 3.0 metric. We also have a number of issues with the impact assessment.

There is a significant difference in the value of the existing site habitat baseline between that provided in the Biodiversity Net Gain Assessment provided by The Ecology Surveyor dated 28/01/2020 and the Biodiversity Offsetting Technical Note produced by FPCR dated July 2021. In 2020 the existing site habitat baseline was 4.54 units while in 2021 this had fell to 3.86 units. Similarly, the hedgerow baseline has fallen from 1.42 units in 2020 to 0.89 in 2021. While it is accepted that different metric calculators have been used we advise that further justification for the discrepancies in the figures need to be provided. We are of the view are of the view that the grassland has been particularly undervalued and should be classed as Other Neutral Grassland of medium distinctiveness rather than modified grassland of low distinctiveness. We advise that justification should be provided in respect of the grassland classification.

The hedgerow calculations have included hedgerows planted as garden boundaries. We do not consider this to be appropriate as the long-term retention and sympathetic management for biodiversity by the homeowners cannot be guaranteed.

The SuDS pond indicated at the outline stage designed to provide biodiversity benefits by holding water and with aquatic plants has been replaced by a drainage basin in an isolated location, less attractive and not connected to wider habitats to benefit amphibians with no retention of water to provide amphibian breeding habitat .

The scheme as submitted by FPCR results in a net gain of only 0.86% habitat units and 7.06% of hedgerow units (including garden hedges). This falls well short of the 10% net gain stated in the planning conditions 3(k) and 4. Consideration should therefore be given to the creation of a pond and planting of hedges within the offsite compensation area to raise its biodiversity value.

We are aware that a single Great Crested Newt was found on the site during a reptile survey carried out as part of the outline application. Mitigation measures were provided in the Ecological Impact Assessment prepared by Prime Environmental dated March 2019. Unfortunately no mention is made of Great Crested Newts and no further information has been provided in respect of mitigation measures for this European Protected Species as part of this reserved matters application. Such information is lacking and needs to be provided prior to the determination of the application.

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 BSc Hons ACIEEM
Biodiversity Planning Officer