



Derbyshire
Wildlife Trust

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

For the attention of Alex Shaw

Your Ref: DMPA/2025/1475

Our ref: DWTSOU1320

19th February 2026

Dear Alex,

Proposal: Outline planning application for up to 125 residential dwellings (with all matters reserved except the main point of access), together with parking, landscaping, drainage and associated works on

Location: Land to the West of Egginton Road, Etwall

Application: DMPA/2025/1475

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 South Derbyshire District Council and the Trust have signed. The following comments are aimed at providing accurate and up to date information on nature conservation issues associated with the proposed development.

Response overleaf

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

01773 881188 • enquiries@derbyshirewt.co.uk

Derbyshire Wildlife Trust Limited is a company registered in England and Wales with company number 715675. Registered charity number 222212. VAT registration number 509 4825 32

Wilder by nature

We have considered the relevant documents submitted as part of the planning application with particular reference to the following reports:

- Preliminary Ecological Appraisal (Enzygo, April 2025)
- Ecological Impact Assessment (Enzygo, December 2025)

The Extended Phase 1 Habitat Survey completed on 13th March 2025, as part of the Preliminary Ecological Appraisal identified the site as comprising modified grassland, bramble scrub, mixed scrub, ponds, wet woodland, buildings and other developed areas. Native hedgerows define the northern and southern boundaries and also enclose the central fields. A line of trees is situated along the western boundary adjacent to Etwall Brook.

It is understood that the development will primarily occupy the southern and eastern fields, retaining a green buffer between the proposed works and Etwall Brook.

We acknowledge that protected species surveys pertaining to foraging and commuting bats and great crested newts were undertaken during the 2025 surveying season.

Bat activity surveys show that the site supports a typical assemblage of common bat species, with most activity focused on foraging and commuting along hedgerows, scattered trees, and woodland edges. Implementing the recommended measures to protect these features, including the use of sensitive lighting is welcomed.

The grassland, scrub and hedgerows offer suitable terrestrial habitat for great crested newts (GCN). An eDNA survey was undertaken on the four ponds within the site, with Ponds 2 and 4 returning negative results for GCN, while Ponds 1 and

3 were found to be dry and therefore unsuitable for breeding. Based on the findings, no further survey effort is required. We support the recommendation for works to be carried out under Reasonable Avoidance Measures (RAMs).

We are unable to comment on any impacts relating to [REDACTED] due to the redacted nature of the report. An unredacted copy of the EcIA should be submitted for review.

Outstanding matters

Habitats

Previous survey work undertaken in 2014 identified the eastern grassland field as semi-improved grassland hay meadow, supporting species such as common knapweed, great burnet, common bird's-foot-trefoil and lady's bedstraw, all of which are indicative of species-rich unimproved grassland. Although very small areas of the meadow showed similarity to MG4 or MG5 grassland communities, these characteristic species were only rarely present. Small patches of meadowsweet, timothy and meadow vetchling were also recorded.

The updated ecological appraisal classifies the eastern field as modified grassland in poor condition, based on the low number of plant species recorded (fewer than nine per m²) and the dominance of perennial ryegrass. As the Habitat Survey was completed in March 2025, outside the optimal survey season, the findings may not reliably reflect the field's ecological value.

We remain concerned that the eastern field may have been undervalued within the PEA and associated biodiversity metric. This is due to the sub-optimal survey timing, earlier survey work indicating a more diverse sward, and recently submitted evidence showing the hay meadow's condition during the spring and summer months.



The grassland should either be reclassified to a higher value within the biodiversity metric, or an updated habitat survey should be undertaken to accurately determine the grassland type.

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

Holly Fowler BSc (Hons)

Biodiversity Planning Lead (South)

planning@derbyshirewt.co.uk