



Derbyshire
Wildlife Trust

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

For the attention of the Case Officer

Your Ref: DMPA/2026/0279
Our ref: DWTSOU1339

16th April 2026

Dear Sir / Madam,

Proposal: Erection of two 3-bedroom semi-detached dwellings and associated landscaping works on

Location: Land between 4 and 6 Manor Road, Stanton, Burton upon Trent, DE15 9SN

Application: DMPA/2026/0279

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

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

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

01773 881188 • enquiries@derbyshirewt.co.uk

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Wilder by nature

- Preliminary Ecological Appraisal (Fenland Ecology, February 2026)
- Biodiversity Net Gain Assessment (Fenland Ecology, February 2026)
- The Statutory Biodiversity Metric (Fenland Ecology, February 2026)
- Site Layout Plan

It is understood that the application site comprises vegetated garden and developed land sealed surface considered to be of minimal ecological importance. We have checked our Biological Records Database, and no records of protected species or notable habitats are present on or adjacent to site nor is the site covered by a statutory or non-statutory nature conservation designation.

It is considered that the survey work that has been undertaken is adequate in support of the planning application and the proposals will not result in a significant adverse impact on biodiversity. However, we support the need to carry out works under best practice measures in order to safeguard nesting birds, hedgehog and badger.

Biodiversity Net Gain (BNG)

We have reviewed the Biodiversity Net Gain Assessment and metric (Fenland Ecology, February 2026). Proposals result in the loss of vegetated garden.

We acknowledge that a parcel of land to the north-east of the gardens to be fenced off, has been allocated to provide biodiversity gains for the development. However, we are concerned to how the gains can be secured given that there is limited public access, and the area seems to lie within the domestic curtilage of the new dwellings.

As per the current guidance, 'the post-development private garden has no public access, and biodiversity net gains cannot be legally secured. As these gains cannot be secured you should only record created private gardens as either:

- *'urban – vegetated garden';*
- *'urban - unvegetated garden'*

You should not:

- record the creation of any other new habitats within private gardens
- record enhancement of any habitat within private gardens'

For this reason, we advise that all 'green space' should be recorded as 'vegetated garden' within the metric.

Notwithstanding the need to address the minor issue as mentioned within the biodiversity net gain assessment pertaining to private gardens, the below conditions are considered to be suitable.

Conditions

Best practice measures

All works should be undertaken in a manner by which to nesting birds, hedgehog and badger. Immediately prior to commencement, the footprint of works should be checked for any wildlife. If any active bird nest is discovered, works must be delayed until chicks have fledged. Active nests are protected by law.

All excavations shall be covered overnight or else have an escape ramp installed to prevent entrapment of badgers, hedgehogs and other wildlife. All pipework greater than 150 mm shall be blanked off at the end of the day and chemicals shall be stored securely. Topsoil mounds shall be checked for badger activity prior to removal or re-use. An ecologist shall be contacted if any evidence of badger activity is found within the application area during development.

Lighting

Prior to the installation of lighting fixtures, a detailed lighting strategy shall be submitted to and approved in writing by the LPA to safeguard bats and other nocturnal wildlife. This should provide details of the chosen luminaires, their locations and any mitigating features such as dimmers, PIR sensors and timers. The Strategy should refer to Guidance Note 08/23 - Bats and Artificial Lighting at Night (BCT and ILP, 2023) and explain how proposals have been designed in compliance with this document. Such approved measures will be implemented in full.

Species Enhancement Plan

Prior to building works commencing above foundation level, a Species Enhancement Plan shall be submitted to and approved in writing by the Local Planning Authority. Approved measures shall be implemented in full and maintained thereafter. The Plan shall clearly show positions, specifications and numbers of features, which will include (but are not limited to) the following:

- integrated universal nest boxes / swift bricks at ratio of 1:1, in line with British Standard 42021:2022, erected at eave level, avoiding southern elevations
- 2 x integral bat boxes in new dwellings, erected at eave level, favouring southern elevations
- bee bricks in new dwellings
- fencing gaps 130 mm x 130 mm to maintain connectivity for hedgehogs in all gardens.

Prior to occupation, a statement of good practice including photographs should be submitted to the local planning authority to fully discharge this condition. This shall clearly demonstrate that the enhancements have been selected and installed in accordance with the above.



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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

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