

From: [REDACTED]
To: [A38 Derby Junctions](#)
Subject: For the attention of the A38 Derby Junctions Case Team
Date: 25 October 2021 16:57:39
Attachments: [image003.png](#)
[Derbyshire Wildlife Trust response Oct 2021.pdf](#)

Attn: A38 Derby Junctions Case Team

Please find attached comments on the above consultation relating to the A38 Derby Junctions proposed development. DWT have up until now provided advice to Derby City Council and Erewash Borough Council on ecological matters. However, we wish to raise a number of issues relating to the applicant's response hence this submission. I trust that DWT can be or already is viewed as an Interested Party, but clearly you will have to determine that in accordance with your own guidelines/rules.

Kind regards

Kieron Huston
Biodiversity Planning and Policy Manager

Derbyshire Wildlife Trust, Sandy Hill, Main Street, Middleton, Matlock, DE4 4LR
Switchboard: 01773 881188
www.derbyshirewildlifetrust.org.uk



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Derbyshire
Wildlife Trust

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

T 01773 881188

E enquiries@derbyshirewt.co.uk

 @derbywildlife

 Derbyshire Wildlife Trust

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Registered charity number 222212
VAT registration number 509 4825 32

The A38 Derby Junctions Case Team,
National Infrastructure,
The Planning Inspectorate,
Eagle Wing 3/18,
Temple Quay House,
Temple Quay,
Bristol,
BS1 6PN,

25th October 2021

Attn: A38 Derby Junctions Case Team

Re: A38 Derby Junctions TR010022 8.121 Applicant's Response to Secretary of State's Statement of Matters of 2 August 2021

With respect to Section 6 of the applicant's response DWT wishes to highlight that the ecological assessment did not include the use of a biodiversity metric to quantify the biodiversity losses that will occur and the proposals for habitat creation and enhancement that the applicant proposes.

DWT has raised concerns with and through Derby City Council and Erewash Borough Council in relation to the absence of biodiversity metrics and this question was discussed during the public enquiry. As we understand it the applicant has indicated that a biodiversity metric will be applied at the detailed design stage. However, the lack of metric information to date means that the magnitude of the impacts on habitats remains largely unquantified and it is therefore difficult for individuals and organisations reviewing the application to gain an understanding of whether the current proposals for mitigation and enhancement will be adequate to fully address the biodiversity losses. The lack of metrics is particularly concerning when habitats such as historic parkland are being directly affected as these are treated as unacceptable loss requiring bespoke compensation measures in Defra's metric.

With regard to section 8 and the potential impact on the veteran oak tree there remains uncertainty on Highways England's part as to whether or not this tree will be retained. We consider that the tree should be retained in situ. Veteran trees are irreplaceable habitats and impacts should in the first instance be avoided.

Yours sincerely,

Kieron Huston

Kieron Huston BSc MSc MCIEEM
Biodiversity Planning and Policy Manager
planning@derbyshirewt.co.uk