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18 September 2025

Dear Mr Glover

Application number: 25/01708/OP

Location: Land opposite Heath Farm Briary Lane Royston Hertfordshire

Proposal: Erection of up to 84 dwellings with public open space, etc.

I apologise for the late arrival of these comments but hope that you will be able to take them into account in your consideration of this application.

The Herts and Middlesex Wildlife Trust **objects** to this planning application due to:

- Lack of an Ecological Impact Assessment
- Insufficient provision of biodiversity net gain on site

Lack of Ecological Impact Assessment

A Preliminary Ecological Appraisal (PEA) has been undertaken in connection with the planning application which refers to protected species surveys being currently underway to inform an Ecological Impact Assessment (EcIA) of the scheme. Until the EcIA has been provided it is difficult to make an informed comment on the impacts of the scheme or the details of the proposed mitigation measures which should be set out in it.

We would be grateful for the opportunity to comment on the EcIA when it is received. No decision on the planning application should be made by North Herts Council until the EcIA has been received and reviewed.

Insufficient provision of biodiversity net gain on site

According to the PEA, 27.39 habitat units will be lost as a result of the development, which is a total net change of -44.77%. Off-site biodiversity net gains will be necessary to secure a 10% biodiversity net gain as required by legislation. We recognise that the applicant proposes a number of ecological enhancement measures, although not all of these (while welcome) are habitat-based and will contribute to the metric. We query why, on a site where 5.96 ha of green infrastructure is being

providing (representing about two thirds of the site area), more cannot be done to provide biodiversity net gain on the site.

We recognise that the application proposes a smaller number of homes than previous planning applications. However, the applicant should start by considering what level of housing development is possible in order to provide a minimum of 10% biodiversity net gain on site, as opposed to relying on off-site provision.

Other matters

I have seen the comments of Natural England regarding potential impacts on the Therfield SSSI and Local Nature Reserve and support them. This is the most significant biodiversity issue raised by the proposal and it is critical that the applicant delivers a package of mitigation measures and/or financial contributions in accordance with North Hertfordshire Council's Therfield Heath SSSI Mitigation Strategy. However, I have nothing further to add to Natural England's comments.

Please contact me if you wish to discuss any of these issues in further detail. I would be grateful for notification of the outcome of the planning application.

Yours sincerely

A solid black rectangular box used to redact the signature of Simon Marsh.

Simon Marsh MBE BA MA MSc MRTPI
Planning and Policy Manager