



Anne McDonald
North Herts Council
PO Box 10613
Nottingham
NG6 6DW

Date: 15th January 2026

CONTAINS SENSITIVE INFORMATION

By email only: Planning Department, planning.control@north-herts.gov.uk

Thank you for requesting advice on this full application from Place Services' ecological advice service. This service provides advice to planning officers to inform North Herts Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Application: 25/02547/FP
Location: Land To The South And East Of Senuna Park Station Road
Ashwell
Proposal: Residential development of 36 no. dwellings including creation of vehicular access off Station Road, associated parking, drainage, amenity space and landscaping.

Thank you for consulting Place Services on the above full application.

No ecological objection	☐
No ecological objection subject to attached conditions	☐
• Further information required/Temporary holding objection on European Protected Species (bats and Hazel Dormouse) • Protected species (Badger) and • Mandatory Biodiversity Net Gains	☐ y
Recommend Refusal	☐
Subject to Natural England's formal comments on the conclusion	☐

of the LPA's Appropriate Assessment	
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Summary

We have reviewed the submitted documents relating to the likely impacts of development on designated sites, protected and Priority species & habitats and identification of appropriate mitigation measures and mandatory Biodiversity Net Gain. These are

- Preliminary Ecological Appraisal and Ground Level Tree Assessment Report v003 (aLyne Ecology, October 2025)
- Design and Access Statement (Barnes Walker Ltd, Nov 2025)

We have also reviewed the information submitted relating to mandatory biodiversity net gains.

- BNG Design Stage Report v003 (aLyne Ecology, October 2025)
- Statutory Biodiversity Metric Calculation Tool screenshots (completed Charlie Gardiner on 1 December 2025) and the excel spreadsheet

We are not satisfied that there is sufficient ecological information available to support determination of this application and recommend that details of survey results, mitigation & enhancement measures are required to make this proposal acceptable/additional information on bats, Hazel Dormouse & Badger is provided prior to determination

This is necessary to provide certainty for the LPA of the likely impacts on designated sites, protected and Priority species & habitats. The reasons for this are outlined below:

European Protected Species:

Bats

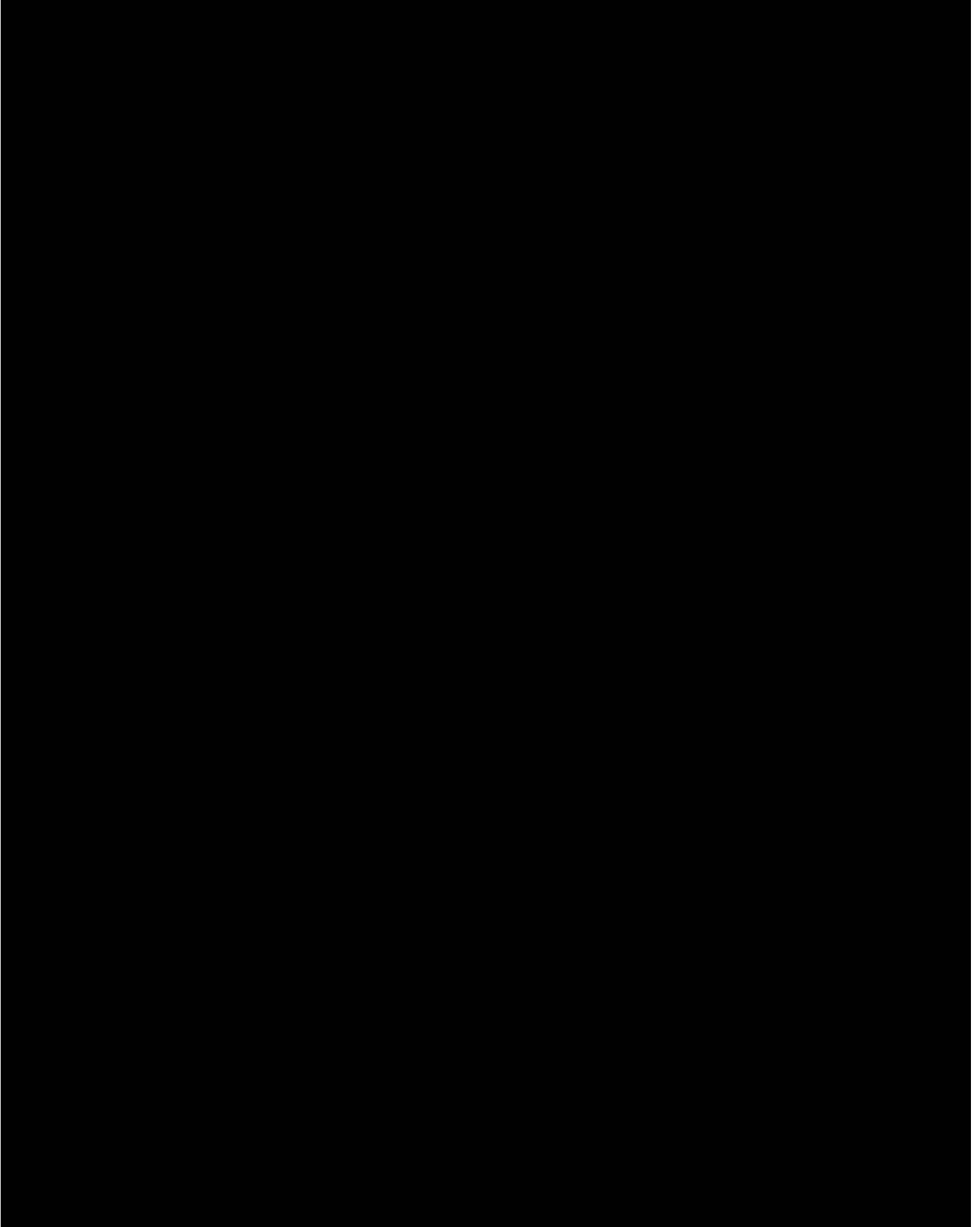
As recommended in section 8.1 of the submitted Preliminary Ecological Appraisal and Ground Level Tree Assessment Report v003 (aLyne Ecology, October 2025) further surveys for bats and the results are needed to inform mitigation measures and the potential for a mitigation licence from Natural England.

Hazel Dormouse

As recommended in section 8.2 of the submitted Preliminary Ecological Appraisal and Ground Level Tree Assessment Report v003 (aLyne Ecology, October 2025) further surveys for Hazel dormouse and the results are needed to inform mitigation measures and the potential for a mitigation licence from Natural England.

Protected Species:





Mandatory Biodiversity Net Gains:

Applications are required to deliver a mandatory 10% measurable biodiversity net gain, unless exempt under [paragraph 17 of Schedule 7A of the Town and Country Planning Act 1990](#) and the [Biodiversity Gain Requirements \(Exemptions\) Regulations 2024](#).

Biodiversity net gains is a statutory requirement set out under [Schedule 7A \(Biodiversity Gain in England\) of the Town and Country Planning Act 1990](#). This legislation was inserted into the 1990 Act by Schedule 14 of the Environment Act 2021, and was amended by the Levelling Up and Regeneration Act 2023. The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2024 made consequential amendments to other parts of the 1990 Act.

The [Biodiversity Net Gain Planning Practice Guidance \(PPG\)](#) sets out how mandatory biodiversity net gains should be applied through the planning process and Paragraph: 011 Reference ID: 74-011-20240214 sets out what information should be submitted as part of a planning application if the statutory biodiversity gain condition applies.

As a result, we have reviewed the submitted Statutory Biodiversity Metric screenshots (December 2025), the Biodiversity Net Gain Design Stage Report (aLyne Ecology, October 2025) and the baseline habitat map and condition assessment sheets and are not satisfied that appropriate information has been provided prior to determination. This is because of the reasons set out below:

- The total habitat area in the Metric does not match the site area within the Application Form (October 2025), with the total habitat area in the Metric being 2.98ha and the site area in the application form being 3.18ha. We require justification as to which site area is correct, and the Metric and baseline habitat maps should be adjusted accordingly, if required.

Where mandatory biodiversity net gains applies, the planning authority will be required to secure a biodiversity gain condition as a pre-commencement requirement. The biodiversity gain condition has its own separate statutory basis, as a planning condition under paragraph 13 of [Schedule 7A \(Biodiversity Gain in England\) of the Town and Country Planning Act 1990](#) and should be included as an informative within the decision notice. The biodiversity gain condition should secure the provision of a Biodiversity Gain Plan prior to commencement, which includes the following:

- a) A Biodiversity Gain Plan form (Ideally using the Government's template: <https://www.gov.uk/government/publications/biodiversity-gain-plan>)
- b) The completed metric calculation tool showing the calculations of the pre-development and post-intervention biodiversity values.
- c) Pre and post development habitat plans.
- d) Legal agreement(s)
- e) Biodiversity Gain Site Register reference numbers (if using off-site units).

f) Proof of purchase (if buying statutory biodiversity credits at a last resort).

In addition, a [Habitat Management and Monitoring Plan](#) (HMMP) should be secured for all [significant on-site enhancements](#). Based on the submitted post-intervention values as they are currently submitted and Government Guidance on what constitutes a significant on-site enhancement, it is suggested that this includes the following habitats:

- Other neutral grassland
- Other woodland; broadleaved
- Other woodland; mixed
- Species-rich native hedgerow with trees
- Urban tree

The decision on whether significant on-site enhancements are present is ultimately up to the Council. Where present, the maintenance and monitoring of significant on-site enhancements should be secured via planning obligation for a period of up to 30 years from the completion of development. This will be required to be submitted concurrent with the discharge of the biodiversity gain condition. Therefore, the LPA is encouraged to secure draft heads of terms for this planning obligation at application stage, to be finalised as part of the biodiversity gain condition. Alternatively, the management and monitoring of significant on-site enhancements could be secured as a condition of any consent. The monitoring of the post-development habitat creation / enhancement will need to be provided to the LPA at years 1, 3, 5, 10, 15, 20, 25, 30, unless otherwise specified by the LPA. Any remedial action or adaptive management will then be agreed with the LPA during the monitoring period to ensure the aims and objectives of the Biodiversity Gain Plan are achieved.

We are generally satisfied that the post-intervention values are realistic and deliverable. However, it is recommended that the following matters will need to be considered by the applicant as part of the biodiversity gain condition:

- The total habitat area differs between the existing habitat and the post-intervention habitat in the metric. As the red-line boundary is not changing, these values should be equal.

Additional information:

We support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended to secure net gains for biodiversity, as outlined under Paragraph 187d and 193d of the National Planning Policy Framework (December 2024). Reasonable biodiversity enhancement measures are a separate matter to mandatory biodiversity net gains and the finalised details should be outlined within a separate Biodiversity Enhancement Strategy to be secured as a condition of any consent.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended) and delivery of mandatory Biodiversity Net Gain.

We look forward to working with the LPA and the applicant to receive the additional information required to support a lawful decision and overcome our holding objection.

Please contact us if you have any queries in relation to this advice.

Sue Hooton CEnv MCIEEM BSc (Hons)

Principal Ecological Consultant

Place Services at Essex County Council



Place Services provide ecological advice on behalf of North Herts Council.

Please note:

- *This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.*
- *We are unable to respond directly to applicants/agents or other interested parties.*
- *Any additional information, queries or comments on this advice that the applicant/agent or other interested parties may have, must be directed to the Planning Officer at the relevant LPA, who will seek further advice from us where appropriate.*