

Officer Liz Anderson – Ecologist

Date 19/11/25

Ref: 25/02615/FP

Att: Thomas Howe

Land Adjacent To 67, Park Lane, Knebworth, Hertfordshire, SG3 6PW

Erection of building for church hall use including car parking, column lighting, hard and soft landscaping, bin store and air source heat pump enclosure on south-west elevation. Alterations to existing vehicular access.

Consultee comments;

Thank you for consulting me, having looked at the submitted documents I would have no ecological objection to the proposal.

The submitted Statutory Metric identifies the site biodiversity baseline as 1.35 Habitat Units with the post-development habitats of the site valued at 1.17 Habitat Units resulting in a net loss of 12.84% in Habitat Units which means that the development is unable to meet the mandatory requirement for 10% BNG on site. As such it is proposed that the 0.31 habitat unit deficit is met by purchasing offsite credits.

The provision of the August 2025 Ecological Appraisal (EA) is welcomed and no impact on protected sites or species has been identified. Recommendations are made for ecological enhancements in 5.4 and, in conjunction with North Herts Local Plan policy NE4, the following condition is advised;

No development shall take place until an Ecological Enhancement Plan (EEP) for the creation of new wildlife features such as the inclusion of integrated bird/bat and bee bricks in buildings/structures, and hedgehog holes in fences has been submitted to and approved in writing by the local planning authority.

Reason: To ensure development is ecologically sensitive and secures biodiversity enhancements in accordance with the North Herts Local Plan policy NE4.

Whilst no evidence of bats was found within the site 4.3.10 of the EA comments, 'the surrounding hedgerows and trees are likely to offer higher quality habitat to feeding and foraging bats'. It is noted that 6m lighting columns are proposed to illuminate the parking area which lies adjacent to habitat with potential bat interest. Due to the presence of bats foraging in the area the use of artificial lighting at night must be strictly controlled and the following condition for a sensitive lighting strategy is advised;

A lighting design strategy for biodiversity for the site shall be submitted to and approved in writing by the local planning authority. The strategy shall;

a) identify those areas/features on site to which bats and other nocturnal species are particularly sensitive and that are likely to cause disturbance in or around their breeding sites and resting places, or along important routes used to reach key areas of their territory, for example, for foraging,

and b) show how and where external lighting will be installed so that it can be clearly

demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

The case officer should note Biodiversity Gain condition wording should be added to the decision notice, the biodiversity gain condition is a pre-commencement condition having its own separate statutory basis and is deemed to apply to every planning permission granted for the development of land in England. To ensure the applicant is clear about this distinction the biodiversity gain condition should not be included in the list of conditions imposed in the written notice when granting planning permission but should remain separate.

Biodiversity Net Gain

*The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition “(the biodiversity gain condition)” that **development may not begin** unless:*

- (a) a Biodiversity Gain Plan has been submitted to the planning authority, and*
- (b) the planning authority has approved the plan.*

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be North Herts Council.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply.

Based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply.