

Hertfordshire LEADS (Ecology)
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09/09/2026

Application:

[26/01985/S73](#)

66 Park Lane, Knebworth, Hertfordshire,
SG3 6PW

Section 73 Application: Variation of
conditions 1 and 14 (Re-vised Plans-
Ecological Enhancements) of Reserved
Matters (appearance, landscape, layout,
scale and internal access) for the erection
of 9 dwellings with associated landscaping,
parking and amenity space pursuant of
outline planning permission 23/02946/OP
granted 19.06.2025.

Documents:

- Decision Notice 25/01658/RM. 28 November 2025.
- Application Form S73. August 2026.
- Proposed Biodiversity Enhancement Plan. Baron Architects. 4 August 2026.
- Tree Constraints and Protection Plan. Rebecca Peace Arboriculture. August 2026.
- Ext Site Location Plan. Baron Architects. 30 April 2026.
- Tree Survey and Arboricultural Impact Assessment with Tree Constraints Plan. 3 January 2024.
- Planning Design and Access Statement. CDS Planning. August 2026.

Summary of Advice:

Advise - Insufficient information to determine application.

The planning officer should either:

1. Refuse the applicant or advise it is withdrawn or,
2. Request further information from the applicant and re-consult the Ecology Service (LEADS) when it is furnished.

Comments and recommended Conditions and Informatives:

Condition 1

We raise no concerns regarding the amendments proposed under Condition 1 from an ecological perspective. However, further information is required in relation to the

proposed variation of Condition 14 and the associated amendments to the Ecological Enhancement Plan.

Condition 14

Condition 14 of Reserved Matters approval 25/01658/RM requires implementation of the ecological enhancements detailed within the approved Ecological Enhancement Plan.

The previously approved Ecological Enhancement Plan secured a package of biodiversity enhancements including:

- installation of bird bricks;
- installation of bat bricks;
- installation of bee bricks;
- hedgehog access provision;
- wildlife-sensitive lighting;
- hedgerow planting;
- shrub planting; and
- wildlife-friendly garden planting.

The approved plan repeatedly refers to bird bricks (swift bricks) being incorporated into the development dwellings with one per proposed dwelling.

Proposed Amendments

The submitted Planning Statement advises that Condition 14 is proposed to be varied because the Ecological Enhancement Plan has been amended to reflect revisions to the approved house types and layout. The applicant states that the principles of the approved ecological enhancement strategy are not changing.

However, following review of the submitted Biodiversity Enhancement Plan, we note that the amended plan appears to show a reduced level of swift enhancement provision compared with that secured under the approved Ecological Enhancement Plan. The revised enhancement plan appears to identify four swift brick locations whereas the approved Ecological Enhancement Plan secured swift enhancement provision across the development.

No ecological justification has been provided explaining:

- why the approved level of swift provision can no longer be accommodated;
- why the reduction in provision is necessary;
- how the revised proposal delivers an equivalent biodiversity benefit; or
- why alternative locations within the revised house designs cannot be utilised.

National Planning Policy Context

It is also noted that the revised National Planning Policy Framework places increased emphasis on the incorporation of nature-friendly building features within new development and specifically references swift bricks as a means of supporting biodiversity within the built environment. Government guidance accompanying the revised framework identifies swift bricks as an example of biodiversity enhancement measures expected within new residential development unless robust justification exists that such features cannot reasonably be accommodated.

Given that Condition 14 already secured swift brick provision within the approved scheme, we consider that strong justification should be provided where a previously approved level of swift enhancement is proposed to be reduced.

Conclusion

Whilst we acknowledge that the proposed amendments to the house types and layout are relatively minor in nature, insufficient information has been provided to demonstrate that the amended Ecological Enhancement Plan delivers biodiversity enhancement equivalent to that secured under Condition 14 of the approved Reserved Matters consent.

The applicant should therefore provide:

- justification for any reduction in swift provision; and
- evidence that the amended enhancement strategy delivers biodiversity enhancement equivalent to the approved scheme.

Until this information has been provided and reviewed, we cannot support the variation of Condition 14 from an ecological perspective.

We trust these comments are of assistance.

Kind regards,

Alice Desborough

Ecology Advisor

Hertfordshire LEADS

Hertfordshire LEADS provides Landscape, Ecology, Archaeology, Design and Sustainability support to planning departments in Hertfordshire.