

Officer Liz Anderson – Ecologist
Date 25/09/2026

Ref: 25/03080/HYA
Att: Naomi Reynard

GA2, Land North-East Of Great Ashby, Stevenage, Hertfordshire

Hybrid application for a residential-led development comprising residential (Use Class C3), educational use (Use Class F1), a community hub (Use Class F2) with associated new internal roads, access, parking, cycling infrastructure, landscaping and other associated infrastructure. Full application comprises the construction of vehicle access and an active travel link via Mendip Way, with associated landscaping and drainage works. The outline application, for which all matters are reserved except means of access, comprises the erection of up to 640 dwellings (Use Class C3), a site for a primary school, further land reserved for educational use (Use Class F1), a site for a community hub (Use Class F2), with associated infrastructure.

Consultee comments;

Full Element – Access Rd

I am happy with proposed planting plan for the road corridor and understand tree species choice is restricted in size due to the powerlines.

[REDACTED]

The provision of lighting design information is reassuring, ecological sensitivities have been acknowledged in the design solution and light spill is minimised. It is noted that originally specified luminaire range was discontinued by the manufacturer which has made way for an improved option and it may be the case that, should planning permission be granted, in the intervening time further advancements in lighting technology is made. In which case it would be beneficial to allow a degree of flexibility in any final scheme to ensure any impacts to ecological receptors are kept to the absolute minimum by securing the best possible solution available at the time. As such, I still suggest the use of a lighting strategy condition to guarantee this.

Outline CEMP

I'm satisfied that the CEMP will provide appropriate protection from harm to ecological receptors though do note reference to an acoustic fence in 11.4, I cannot see detail on this in the noise report and, if such a fence is to be any potential impact on ecological connectivity must be addressed.

Badgers

Information provided within the April 2026 meeting note is generally accepted, particularly in reference to mammal tunnels, sett closures [REDACTED] and bait marking. I would also question the statement in 3.2 Stating *Occupation of housing, and the local population, could potentially come into conflict to the badgers, which could directly result in legal infringements. This is likely the case for almost any residential development in proximity to open countryside.* I disagree, it is far from the norm for a badger population the size of that found at GA2 to be so close to residential development but accept the justification and potential mitigation measures associated with the avoidance of potential badger conflict.

Connectivity

It is for the case officer to balance the needs of the development against potential ecological impacts. Having spent time in discussion with the case officer, applicant and specialists, I feel we are at a best worst-case scenario with unavoidable incursions into buffers and corridors caused by the need for transport access kept to the very minimum. I would hope that as RM applications come forward, such incursions may be further reduced in the southeast part of the site, phase three where a bus route circumnavigates Nine Acre Spring.

I had previously asked that hedgerow 11 be retained and removed from the developable area. The loss is referred to in Table 9.1 of the Nov 2025 ES Chapter 9. Stating '*Hedgerow 11 is a small unconnected stretch of category C hedge, which has been proposed for removal in order to rationalise the development area and relocate a new, connected green corridor with swales and new planting.*' [REDACTED]

[REDACTED] There is an existing hedgerow – 11 - plus also the route of existing footpath. So why not retain it as part of a wider corridor?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

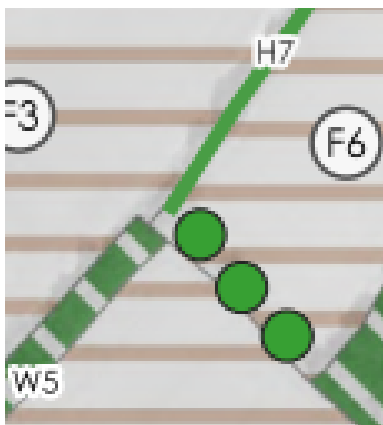




The land use framework plan still shows this corridor removed.

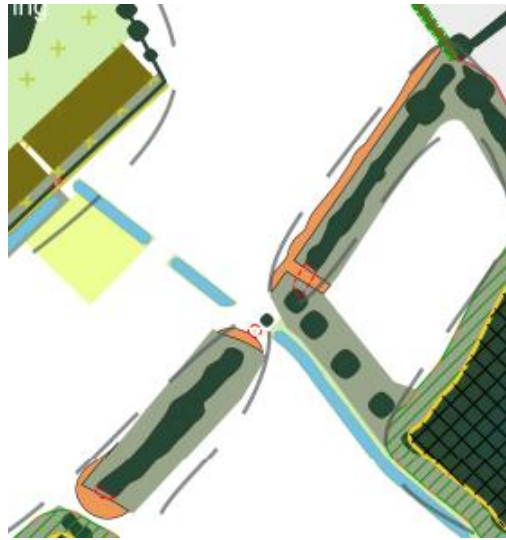
Access into the parcel to the west of Longdell wood is shown cutting through hedgerow 7, this is not necessary as there are already gaps to the south that should be utilised. This is also shown on the tree retention and removal plan. Once again, this is the outline element of the application, and this removal is contrary to the developable area parameter plan. [REDACTED]

[REDACTED]. The meeting note explains that the applicant has moved the access into the parcel further south stating '*...root protection areas and the woodland buffer to the south which cannot be used as an access point due to the mature trees.*'. However, the arboricultural report indicates approximately 6m between T54 and T53 which should be sufficient for a single lane access?



The N-S corridor containing H7 and W5 is becoming increasingly denuded and bringing the access into the Longdell wood parcel further south reduces habitat continuity further. The developable area parameter plan does not detail an access so I would recommend this is considered further when phase 3 comes to reserved matters. Reassessing ecological receptors and minimising impacts to ecological connectivity.

Comments received from HMWT and NE have flagged the value of 15m woodland buffers and I noted NE specifically advises 'A *minimum 15m buffer around ancient woodland and woodland habitats*'. Most of the woodlands are shown with this buffer but W5, shown above, does not benefit from such. This, combined with the extensive incursions into the buffer to hedgerow 7 is extremely detrimental to the effectiveness of this corridor.



It is understood that access roads need to cut through at points but, given this part of the application is currently outline I see no reason for the built element of the scheme to take so much of the natural space. It is accepted that the applicant has made great efforts to accommodate various infrastructure requirements and incorporate hop-overs into design but I do share concerns in relation to a landscape led or access led application.

Indeed, one of the recommendations from the May 2024 Design Review was to '*develop a truly landscape-led scheme by reinforcing the existing green corridors and allowing the topographical ecological and hydrological features of the site to structure the master plan layout*'. Stating the scheme should reinforce a stronger landscape structure allowing for green corridors and routes that work with the natural functions of the landscape as well as opportunity to connect the fragmented blocks of woodland across the site. H11 is case in point here where there is an existing surface water flow and hedgerow.

The Planning Statement concludes in 2.26 '*Overall, the site supports a range of protected species associated mainly with its woodland edges, hedgerow network and open grassland*'. We need to be mindful of the fact that these very habitats are the ones which will be most exposed to disturbance and impact from the development proposal. Mitigation and, where unavoidable loss occurs, compensation to prevent harm are essential.

Severance of wildlife corridors across the site must be kept to a minimum, as should any loss of existing connective networks. The wider impacts identified are associated with the outline elements of this application and should be addressed at reserved matters stage. Never-the-less, ensuring framework and parameter plans which will be approved are sufficient to prevent harm and maximise opportunities for ecological gains must be secured now.

July 2026 DAS

5.26 Central open space running under existing overhead powerlines providing new habitat corridor in existing arable land, including orchard, trees, SuDS and scrub habitat, orchard planting is not currently indicated under lines.

9.94 states '*Orchard trees could be located beneath the overhead lines, using shorter trees to reduce the visual dominance of the pylons, and utilising orchard species of local provenance*' This does not seem right? MM106 stock still grows to 5m, what is a safe height to prevent arcing? I support orchards but this is a risk and advise they are located elsewhere and alternative growing options like soft fruit bushes are introduced.

7.102 considers GI including woodland, scrub, grassland, wetlands and open water and states '*The Site includes 8.73ha of retained woodland. Most of which is Ancient. However, as they are Ancient Woodlands, they are ecologically very valuable, and also very sensitive to trampling. Therefore, no public access is proposed into the Ancient Woodland on or adjoining the Site.*'. This is welcomed and should be secured by a woodland recreation management plan which could be incorporated into the LEMP as inferred in 7.103 '*At the Reserved Matters stage, a Landscape and Ecology Management Plan and potentially a Forestry Management Plan, will be agreed with the Council in order to manage the trees, wildlife, and access into the woodlands on the Site, as well as New Spring, to enhance these habitats, ensure their continued survival, and to prevent harm to the Ancient Woodlands.*'. This should be a condition of the OP.

7.135 refers to ecological mitigation strategy for off-site provision of ground-nesting, feeding and winter forage for a range of farmland species, such as skylark. I note the location of the off-site provision is included in Appendix C of the resubmission covering letter and advise securing Skylark mitigation should be part of the section 106.

Amended Outline LEMP

Contents are noted and a LEMP condition will be expected, presumably there will be one for the Full element of the application with another to cover the remainder of the application site to be reflected in the Habitat Management and Monitoring Plan which will also be conditioned.

There is no mention of the old chalk quarry on site in Nine Acre wood which is identified as of potential value for invertebrates and would need careful management, removing shading vegetation to expose the bare chalk substrate and allow specific plant assemblages to colonise.

11.7.110 talks about monitoring with surveys of woodland, wetlands, grasslands, SuDS and hedgerows to ensure they are being managed according to the LEMP, how will this monitoring tie in with HMMP monitoring? It would seem prudent to combine these.

Overall content with the proposals and particularly welcome mention of an on-site green waste composting facility. Given the size of the site and the area of grassland that will be receiving a cut and collect I am intrigued to know where this will be and how it will be managed. It would be beneficial if the composted product could, itself, be used on site or available to residents?

Draft Outline HMMP

The use of images indicating what success should look like is helpful. Monitoring intervals should align with NHC requirements as detailed in the draft HoT; years 1,2,3,5,7,10,15,20,25 and 30 where the LPA will visit the site. The provision of a finalised HMMP in accordance with the Biodiversity Gain Plan should be conditioned.

BNG Metric

All that is required at application stage is a baseline metric. There will be updates to site layout and indeed, over the development period, the baseline may change and an updated metric will be required to support any submitted Biodiversity Gain Plan (BGP).

A statutory Biodiversity Metric has been supplied with the application, this identifies the site baseline as 138 habitat units and 24 hedgerow units. The application is subject to mandatory 10% BNG and the applicant expects to exceed this. Additionally, where mitigation is referred to in the case of buffering the

ancient woodland, this can only count towards no net loss in a BNG calculation. I would expect the applicant will still be able to demonstrate 10% gains without this scrub creation but an explanation to that effect would help clarify where figures have come from when a final BGP is submitted.

I acknowledge this is an allocated site and the application is hybrid. Therefore, the parameter plan and framework plan need to reflect sufficient areas of undeveloped land will be retained not only to deliver the mandatory 10% BNG, but to ensure any impacts to ecological receptors can be appropriately and adequately mitigated.

Suggested Conditions

Recommendations are made for **ecological enhancements** 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 (swift bricks should be used where building heights allow), hedgehog holes in fences and hibernacula has been submitted to and approved in writing by the local planning authority.

The potential for disturbance to nocturnal species from lighting on site is raised and a sensitive **lighting strategy** is advised;

A lighting strategy for biodiversity on 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 (through the provision of appropriate lighting contour plans and technical specifications) 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.

Landscape Ecological Management Plan

The development shall not commence until a Landscape Ecological Management Plan (LEMP) incorporating an Ancient Woodland recreation management plan has been submitted to, and approved in writing by, the local planning authority and including.

(a) a non-technical summary;

(b) the roles and responsibilities of the people or organisation(s) delivering the LEMP;

(c) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;

(d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development;

Construction Environmental Management Plan

No development shall take place (including ground works or vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following.

- a) Risk assessment of potentially damaging construction activities.*
- b) Identification of “biodiversity protection zones”.*
- c) Practical measures to avoid or reduce impacts during construction.*
- d) The location and timing of sensitive works to harm to biodiversity features.*
- e) The times during construction when specialist ecologists need to be present on site to oversee works*
- f) Responsible persons and lines of communication.*
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- h) Use of protective fences, exclusion barriers and warning signs.*

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by 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) either:

(i) a biodiversity gain plan for that overall development has been submitted to the planning authority; and

(ii) the planning authority has approved that plan;

(b) or:

(i) a biodiversity gain plan for the overall development has been approved;

(ii) permission has been granted on an application made under section 73; and

(iii) the earlier biodiversity gain plan for that overall development is regarded as approved under section 73(2C) and (2D) for the purpose of the permission granted under section 73.

A biodiversity gain plan is a plan which:

(a) relates to the development for which planning permission is granted;

(b) specifies the following matters:

(i) information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat;

(ii) the pre-development biodiversity value of the onsite habitat;

- (iii) any registered offsite biodiversity gain allocated to the development before the date of submission of the biodiversity gain plan and the biodiversity value of that gain in relation to the development;*
- (iv) any registered offsite biodiversity gain proposed to be allocated to the development and the biodiversity value of that gain in relation to the development;*
- (v) any biodiversity credits purchased before the date of submission of the biodiversity gain plan;*
- (vi) any biodiversity credits proposed to be purchased for the development;*
- (vii) the post-development biodiversity value of the onsite habitat for the overall development;*
- (viii) except in a section 73 case, the post-development biodiversity value of the onsite habitat for each phase of development;*
- (ix) in a section 73 case, the post-development biodiversity value of the onsite habitat for each phase of development (whether begun or otherwise); and*
- (x) such other matters as the Secretary of State may by regulations specify*

No phase of development may be begun unless the following has been met in respect of that phase:

- (a) either: (i) a biodiversity gain plan for that phase has been submitted to the planning authority; and (ii) the planning authority has approved that plan*
 - (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.

Habitat Management and Monitoring Plan

No phase of development shall commence until a [Habitat Management and Monitoring Plan (the HMMP)], prepared in accordance with the approved Phase Biodiversity Gain Plan for that phase has been submitted to and approved in writing by the local planning authority and including:

- (a) a non-technical summary;*
- b) the roles and responsibilities of the people or organisation(s) delivering the [HMMP];*
- (c) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Phase Biodiversity Gain Plan for that phase;*
- (d) the management measures to maintain habitat in accordance with the approved Phase Biodiversity Gain Plan for that phase for a period of 30 years from the completion of development; and*
- (e) the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority.*