

Officer Liz Anderson – Ecologist
Date 6/10/2025

Ref: 25/02064/OP
Att: Ben Glover

Land Adjacent To 10, Hambridge Way, Pirton, Hertfordshire

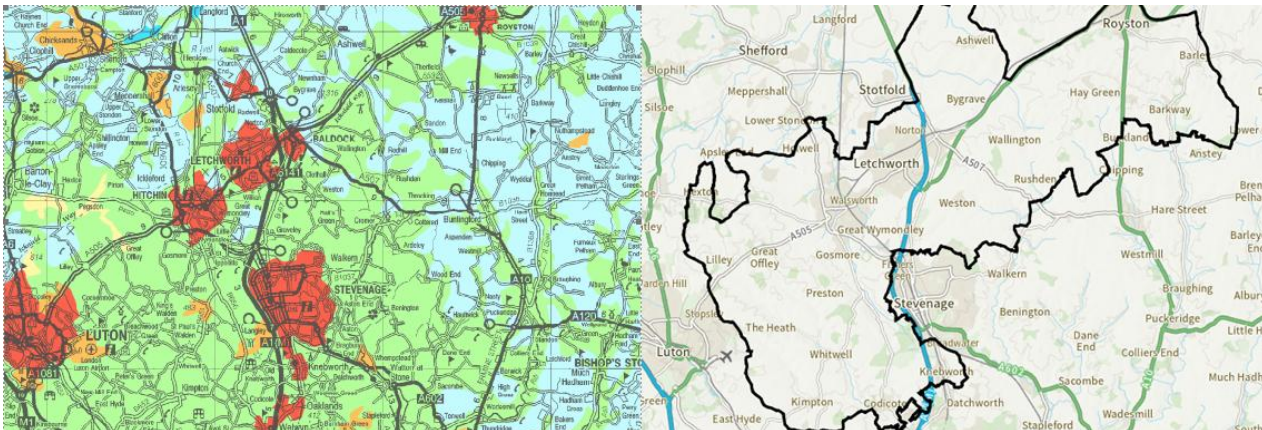
Erection of up to 50 dwellings including affordable housing, together with amenity space, landscaping and all associated infrastructure and works (all matters reserved except means of access).

Consultee Comments;

The provision of ecological survey data is welcomed and the absence of reptiles noted. However, photos of hedgerows cannot be linked to those on the map as they are not numbered?

Additionally, there a couple of aspects noted within the DAS which are incorrect;

6.67 of DAS states 'Almost all the agricultural land within the North Hertfordshire District Council area is provisionally mapped as Grade 2 (BMV) (very good)' This is not the case as the image shows, barely half of North Herts would be classed as grade 2.



The loss of biodiversity from the site as a result of the proposal's inability to deliver 10% BNG on site should be considered a negative, not given significant positive weight in terms of planning balance as referred to in 6.39 of the DAS.

Pre-application information claimed there was '*...eminently scope to deliver significant enhancements to biodiversity at the Site, through the delivery of a site-wide green infrastructure strategy... measures such as supplementary planting and long-term management and providing*

new species-rich habitats as part of the development including wildflower grassland, trees, scrub and wetland habitats...'. If the scheme had done this, it indeed would be a positive, but it is disappointing to see that claims of '..ensuring that the new development would not only offset any unavoidable biodiversity losses but deliver long term enhancements compared to the existing situation.' have not been achieved.

The submitted Statutory Metric shows the proposal's inability to meet the mandatory requirement for 10% BNG and actually resulting in a loss of 19.32% of Habitat Units. I see no reason why a greenfield site should not be delivering at least 10% BNG on site, off-site provision would not be supported.

The site layout in the landscape strategy differs to that of the illustrative site plan, pre-app comments on ecology requested a draft HMMP supports any future application, the PEA also recommends this so it would be helpful if this could be provided as, even though this is an outline application, an element of certainty is required where BNG is concerned.

I note no bat interest was identified in buildings on site. The PRA states '*Although the buildings provide negligible roosting potential, the surrounding hedgerows and tree lines offer foraging and commuting habitat for bats*' advising a sensitive lighting scheme but no assessment is provided in terms of the impact as a result of the loss of the central hedgerow?

Great Crested Newts were confirmed as present in the surveyed ponds and the applicant has chosen to use the Natural England District Level Licence route to allow works to proceed lawfully. However, to do this an Impact Assessment and Conservation Payment Certificate is required which appears to be missing. Applicants are advised that they must include a copy of the countersigned IACPC with your planning application to show you've agreed to join the scheme. This is detailed on gov.uk; [Developers: how to join the great crested newt district level licensing scheme - GOV.UK](#)

North Herts Local Plan policy NE4 requires 12 metres of complimentary habitat be provided around trees and hedgerows and this site layout fails to achieve that. It is accepted that this is an outline application, but consideration should be given to how roads and parking bays are accommodated as these would not be considered complimentary habitat.

More information is required.