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Application

Conversion of a grade II listed building and associated curtilage listed building to two semi-detached residential dwellings (1 x 3-bed and 1 x 4-bed) including demolition of modern extension and replacement single storey extension. Erection of four detached and semi-detached dwellings (4 x 4-bed); four bay cart shed for covered parking; associated parking and gardens; and minor alteration to existing vehicular access and partial widening of access road following demolition of existing structures. [26/00318/FP](#) Barn To The West Of Lordship Farmhouse Pirton Road Holwell Hertfordshire

Documents;

- Preliminary Ecological Appraisal (PEA), February 2025 (site survey 11/02/2025), ProHort Limited.
- Biodiversity Net Gain Assessment / Biodiversity Net Gain Report, February 2025, ProHort Limited.
- Biodiversity Net Gain Matrix, February 2025, ProHort Limited.
- Statutory Biodiversity Metric Calculation Tool (Mandatory Metric), Completion Date 12/02/2025, completed by Ioana Andor, ProHort Limited.
- On-site Baseline Habitat Map, February 2025, ProHort Limited.
- On-site Post-intervention Habitat Map, February 2025, ProHort Limited.

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 Refuse the applicant or advise it is withdrawn or,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.

Pre-determination

- [Protected](#) species,
Further surveys required (Bat Emergence surveys, Barn owl nest site verification survey)

[BNG](#)

Sufficient minimal information,

Determination

- [Protected species](#), Condition Mitigation measures, Condition enhancements.

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	• BNG – Onsite BNG is significant enhancement secure by condition. • Conditions Lighting, CEMP, Species and Landscape Enhancement Plan, translocation measures. Post- Determination • BNG – Guidance on matters identified at this point that will need resolving if the BGP is to be discharged.
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Comments and recommended Conditions and Informatives:

Ecological report

The application is accompanied by an ecological report which includes a desk-based records search using the Local Record Centre for protected and notable species and non-statutory designated sites within 2 km of the site, together with DEFRA MAGIC mapping for statutory designations, priority habitats and protected species licence records. I am not aware of any other existing ecological records for this site.

Habitats

Survey was undertaken on the January 2025 outside the main flowering season which is disappointing. However, the species listed and site character do not suggest that a higher distinctiveness grassland than modified grassland as assessed is likely to be present, with the species recorded being common agricultural and ruderal taxa.

Protected species

Bats – Buildings (Barn 1 & Barn 2)

The ecological / bat report provides a Preliminary Roost Assessment (PRA) of Barn 1 (B1) and Barn 2 (B2) and categorises both as low roosting potential. Given the buildings' design, age and access points and the proposal for conversion works at roof level, there is a reasonable likelihood that bats could be present and affected. In accordance with the Bat Conservation Trust Good Practice Guidelines (4th edition, 2023), one nocturnal emergence survey with three surveyors has been recommended to determine presence/absence prior to determination. Presence/absence surveys cannot be carried out or completed by condition because bats are a European Protected Species; sufficient information must be submitted to the LPA before determination. Consequently, I advise the recommended survey is undertaken and the results, including any necessary mitigation, are submitted to the LPA for approval.

Given the quality of surrounding foraging and commuting habitat, I support the Artificial Lighting Strategy provided within the report and advise it should be secured by a compliance [Condition](#).

Breeding birds: All birds are protected from being killed or injured and their nests from being destroyed or damaged whilst in use. Schedule 1 birds are also protected from disturbance during nesting. Evidence of nesting birds (including feral pigeon nesting material and eggshells) was recorded within Barn 1 and Barn 2. Standard precautions should be followed and secured as part of a CEMP (see below).

Schedule 1 Birds (Barn Owl)

All on-site barns have previously been **confirmed to be used by barn owl**. A barn owl nest site verification survey is required prior to determination to confirm occupation status and to inform any necessary mitigation for conversion of Barn 1 and Barn 2. Works must avoid the breeding period and any mitigation should be designed and implemented by a suitably licensed and experienced ecologist.

Great Crested Newt (GCN)

No GCN records were returned; there are two waterbodies within 250 m (pond and moat) that were not accessible for survey. The site itself lacks aquatic habitat and has extensive bare ground with negligible terrestrial suitability around the barns; affected areas are limited to the building footprints and immediate surroundings. Importantly the hedgerows are being retained. Consequently, on this occasion, I do not consider there is sufficient likelihood of GCN being present and affected to require formal survey prior to determination. However great crested newt records are known from nearby. A precautionary approach should be taken; and a method statement secured as part of a CEMP (see below).

Other Protected Species Mitigation: I support the use of precautionary mitigation measures for reptiles and badgers and advise these should be secured by a [Condition](#) requiring a CEMP.

Priority Species

Hedgehog: Hedgehog records exist within the wider area. The barns and immediate surroundings offer limited resource, but precautionary measures are required: cover excavations and pipes overnight, check and hand-clear any brash/rubble piles outside October–March, and implement a site induction/toolbox talk on hedgehog awareness.

Species enhancements

The Ecological report includes recommendations for species enhancements I advise the installation of these will allow the application to be policy compliant with section 187d of the NPPF and Local policy-. I advise these are secured by the following [Condition](#) or similar.

BNG- Pre Determination

Minimum BNG information pre- determination: A baseline map has been provided which is consistent with the habitat assessment. The metric calculation tool (Mandatory Metric), completed on 12.02.2025, shows

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baseline values of 0.66 Habitat Units, 0.20 Hedgerow Units. The baseline habitats are consistent with the baseline habitat map and the outcomes of the botanical surveys submitted. As a result, I have no reason to doubt these values. Consequently, I advise that the minimum information requirements have been met and the application can be determined accordingly.

BNG- Determination

Significant On Site Enhancement: The proposed BNG includes areas of medium distinctiveness habitat, including urban trees outside of the gardens spaces for the new dwellings. As a result, I advise that the onsite enhancements should be considered Significant and should be secured in this case by a planning [Condition](#) requiring a Landscape Ecological Management Plan. In this case this can be combined with the proposed species enhancements into a **Species and Landscape Enhancement Plan**.

BNG net gain predetermination: An overall net gain greater than 10% that meets the trading rules has been shown to be possible. This is proposed to be achieved entirely through on site biodiversity enhancements. The metric demonstrates an on site delivery of 0.74 Habitat Units, representing a total net change of 12.12%; 0.31 Hedgerow Units, representing a total net change of 55.23%; all of which exceed the statutory minimum requirement of 10% Biodiversity Net Gain. Whilst the biodiversity gain condition is a post determination matter, the information submitted provides the LPA with reasonable confidence that the Biodiversity Gain Condition can be discharged, subject to approval of a Biodiversity Gain Plan demonstrating delivery in accordance with the final metric.

BNG-Post Determination.

LNRS & Post Determination Strategic significance: Areas of the application site are covered by mapped measures within the strategy. If the application is approved, the Biodiversity Gain Plan and supporting metric should reflect high strategic significant values for any areas (1) that are shown in the published local strategy and (2) deliver the mapped measures for that area. Any post development habitat interventions that meet both of these criteria will achieve a biodiversity unit uplift.

Biodiversity Gain Plan: I advise this is completed using the government template. In order the Biodiversity Gain Plan to be discharged it should be submitted with the following minimum information either within the body of the plan or as supporting information.

- Completed metric tool calculation that demonstrates
 - a minimum 10% net gain achieved within the trading rules and consistent with the figures quoted within the Biodiversity Gain Plan.
 - A fully completed start page including project details and the date the final version of the metric was completed.
- pre-development and post-development plans (showing the location of on-site habitat, the direction of north and drawn to an identified scale, Post Development Plans should be sufficient to record the location of the post determination habitats within the final metric submitted to discharge the BGP.

- a description of how they will manage and monitor significant on-site gains (for example, With a habitat management and monitoring plan)

Conditions:

Lighting Strategy- Condition.

“The development shall be carried out in full accordance with the artificial lighting mitigation measures for bats set out in Section 4.1.1 (Artificial Lighting Strategy) of the Preliminary Ecological Appraisal, February 2025, prepared by ProHort Limited.

These measures shall include, but not be limited to: the use of low-intensity, warm-white lighting (≤ 2700 Kelvin); luminaires with no upward light spill; directional lighting angled away from buildings, rooflines, hedgerows, trees and other vegetation; motion-activated and time-limited lighting where required for health and safety only; and the avoidance of UV-emitting light sources.

The lighting scheme shall be informed by Guidance Note 08/23: Bats and Artificial Lighting in the UK (Bat Conservation Trust & Institution of Lighting Professionals, 2023).

All lighting mitigation measures shall be implemented in full prior to first occupation and shall thereafter be permanently retained unless otherwise agreed in writing by the Local Planning Authority.”

A Species and Landscape Enhancement Plan -Condition.

“Prior to the commencement of development, a Species and Landscape Enhancement Plan for Habitats within communal areas and protected and priority species shall be submitted to and approved in writing by the Local Planning Authority.

The Plan shall include, but not be limited to, the following details:

- a) location, type of habitat within the communal areas.*
- b) A management prescription to ensure these habitats meet and sustain the target distinctiveness and condition as set out in the metric that is referenced in the approved Biodiversity Gain Plan for a period of 30 years.*
- c) Description, design and specification of each feature;*
- d) Exact locations, shown on scaled plans and elevations where relevant;*
- e) Timing of installation within the construction programme (features to be installed prior to occupation);*
- f) Persons responsible for installation and aftercare;*
- g) Maintenance requirements (where applicable).*

The approved scheme shall include the following minimum on-site enhancements, unless otherwise agreed in writing by the LPA:

- At least 1 no. integrated bat roost feature (e.g. bat brick, bat tube or access panel) installed within the external fabric of a retained or converted building.*
- Features shall be integral (built-in) rather than surface-mounted, positioned at a minimum height of 4 m, and located away from external lighting.*
- At least 2 no. integrated universal bird nesting features,*

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The approved biodiversity enhancement measures shall be:

- Implemented in full in accordance with the approved details and timescales;*
- Installed prior to first occupation of the development; and*
- Retained thereafter for the lifetime of the development for their intended biodiversity purpose.”*

Construction Environmental Management Plan (CEMP)- Condition.

“No development shall take place (including demolition, ground works, vegetation clearance) until a Construction Environmental Management Plan (CEMP) including a section for ecology has been submitted to and approved in writing by the local planning authority. The CEMP shall include but not necessarily be limited to, the following.

- 1. A review of any ecological impacts and should be informed by the submitted ecological report: Preliminary Ecological Appraisal (PEA), ProHort Ltd, ref. Q13532, Version 1, dated 11 February 2025.*
- 2. Risk assessment of potentially damaging construction activities.*
- 3. Identification of ‘biodiversity protection zones’*
- 4. A set of method statements outlining practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction.*
- 5. The location and timings of sensitive works to avoid harm to biodiversity features. (e.g. daylight working hours only starting one hour after sunrise and ceasing one hour before sunset).*
- 6. Use of protective fences, exclusion barriers and warning signs, including advanced installation and maintenance during the construction period;*
- 7. A non-native invasive species protocol (e.g. for Japanese knotweed);*
- 8. The times during construction when specialist ecologists need to be present on site to oversee works.*
- 9. Responsible persons and lines of communication.*
- 10. The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details.”

Reason: To ensure sensible working practices which protect ecology on and adjacent to this site.

I trust these comments are of assistance and kind regards.

Signature
Hertfordshire LEADS