

Hertfordshire LEADS (Ecology)
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07/07/2026

Application:

[26/01069/FP](#)

External alterations to replace windows and doors, roof alterations with installation of rooflights, inset balconies and dormer windows, extend existing entrance ramp, hard and soft landscaping alterations to include a central courtyard to replace existing parking/ hardstanding, and installation of refuse storage and cycle stores and external lighting.

Radcliffe House Tilehouse Street Hitchin
Hertfordshire SG5 2DW

Documents:

- Biodiversity Net Gain Plan, 13.4.26.
- Statutory Biodiversity Metric Calculation Tool, 2.4.26.
- Arboricultural Impact Assessment & Method Statement, 01.04.26.
- Site Boundary Plan, 04.26.
- Existing Site Plan, 04.26.
- Proposed Site Plan, 04.26 (Rev P1 dated 19.05.26).
- Proposed Roof Plan, 04.26 (Rev P2 dated 19.05.26).

Consultancy:

- MKA Ecology Ltd.

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 Refuse the applicant or advise it is withdrawn or,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 information required with regards to bats.
- **BNG** – Sufficient minimum information for determination, enhancements are not significant, Guidance on the BGP stage.
- **Conditions and Informatives:**
 1. Nesting bird informative
 2. Mammal informative

Comments and recommended Conditions and Informatives:

Protected species

1. **Roosting Bats:** The Preliminary Ecological Appraisal (PEA) submitted by MKA Ecology Ltd assessed that recommends that a Preliminary Roost Assessment (PRA) is undertaken at Radcliffe House as the house was found to have features that may have the potential for roosting bats and modifications to the roof are proposed. The PEA further recommends that a Ground Level Tree Assessment (GLTA) is undertaken on TB1 and TB2, the two trees on-site that will need to be pruned as a result of the proposed works. I support these recommendations, and these surveys do not appear to have been carried out as no reports detailing the results of such surveys have been submitted. As bats are classified as European Protected Species, sufficient information is required to be submitted to the LPA prior to determination to enable it to consider the impact of the proposal on bats.

Consequently, I advise sufficient bat surveys and subsequent report(s) are completed and submitted to the LPA for approval prior to determination. The results of these will inform whether any emergence surveys are subsequently required and any suitable mitigation and enhancements regarding bats e.g. a sensitive lighting strategy. If evidence of bat roosting potential is found here, up to three dusk emergence surveys will likely be required. Whilst a PRA can be carried out at any time of year, emergence surveys are restricted to the summer period, ideally from May until the end of August. Given these seasonal constraints I would urge the applicant to commission the PRA promptly.

2. **Nesting birds:** The PEA assessed the likelihood of birds nesting on-site during the nesting period as high. All wild birds, their nests, eggs and young are afforded protection and in general terms it would be an offence to kill, injure or displace breeding birds and their young. To reduce the risk of an offence being committed, a precautionary approach is required and therefore I recommend the below [informative](#) is added to any consent granted. The PEA report also recommends that “a minimum of two generalist 33mm bird boxes should be installed on the associated trees and three swift boxes on each building”. I would support these recommendations - the NPPF states that planning decisions should enhance the natural and local environment by incorporating features which support priority or threatened species such as swifts, bats and hedgehogs, and furthermore, this site is included within the Hertfordshire Local Nature Recovery Strategy (LNRS) mapping for the priority “Restore Swift populations”.
3. **Other protected species:** The PEA also recommends mitigation and enhancement measures with regards to other protected species, notably badgers and hedgehogs. I would support these recommendations, and advise that the below [informative](#) advising a precautionary approach to the proposed works with regards to these species are added to any permission granted.

BNG – Pre-determination

1. **Habitat Assessment:** Sufficient information has been provided to allow the LPA to consider the UK habitat and habitat condition assessments provided. Based on this

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information, I advise that the LPA can be confident that the habitat assessment is sufficient to populate the biodiversity metric.

2. **Minimum BNG information pre-determination:** A baseline map has been provided which is consistent with the habitat assessment. The submitted metric containing the metric start page includes the completion date and the name of the person completing the metric. The metric calculation tool (Statutory metric – dated 2.4.26) shows base line values of 0.62 Habitat Units and 0.01 Hedgerow Units. The baseline habitats are consistent with the baseline habitat map and outcomes of the botanical surveys submitted. As a result, I have no reason to doubt these values.
3. **Strategic Significance:** The values for the baseline habitats have been set as low in line with government LNRS guidance.

Consequently, I advise that the minimum information requirements for BNG predetermination have been met and the application can be determined accordingly.

BNG – Determination

1. **Non-significant on-site enhancements:** Due to the scale and type of the proposed BNG on-site enhancements, I advise that they should be considered non-significant.
2. **An overall net gain greater than 10% that meets the trading rules has been shown to be possible.** This proposes to be achieved by delivering an on-site net gain of +0.27 habitat units resulting in a 43.86% increase and +0.07 hedgerow units resulting in a 538.50% increase.

BNG – Post-determination

1. **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.
2. **Biodiversity Gain Plan:** I advise this is completed using the government template. In order for 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:
 - A 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.

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- a fully completed start page, including project details and the date that the final version of the metric was completed.
- where off-site units are being used, these should be shown in the appropriate tab of the metric, and the off-site gain site summary should be 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.
- If off-site units are being used, the biodiversity net gain register reference number will be required for a completed BGP.
- Proof of purchase if they're buying statutory biodiversity credits.
- A description of how they will manage and monitor significant on-site gains

Conditions and Informatives

1. **Nesting bird precautionary approach informative:** *"In order to protect breeding birds, their nests, eggs and young, development should only be carried out during the period October to February inclusive. If this is not possible then a pre-development (i.e. no greater than 48 hours before clearance begins) search of the area should be made by a suitably experienced ecologist. If active nests are found, then works must be delayed until the birds have left the nest or professional ecological advice taken on how best to proceed".*
2. **Protected species (mammals) precautionary approach informative:** *"To avoid the killing or injuring of wildlife during development, best practice should keep any areas of grass as short as possible and any longer, ruderal vegetation should be cleared by hand. To avoid creating refugia that may be utilised by wildlife, materials should be carefully stored on-site on raised pallets and away from the boundary habitats. Any trenches on site should be covered at night or have ramps to ensure that any animals that enter can safely escape, and this is particularly important if excavations fill with water. Any open pipework with an outside diameter greater than 120mm must be covered at the end of each working day to prevent animals entering / becoming trapped."*

I trust these comments are of assistance and kind regards.

Isabelle Hasell

Assistant Ecology Advisor, Hertfordshire LEADS