

Officer Liz Anderson – Ecologist
Date 26/08/2025

Ref: 25/01696/OP
Att: Naomi Reynard

**Land South East Of Holwell Road And North Of Hambridge Way, Pirton, Herts,
Outline application for the erection of up to 130 dwellings with public open space,
landscaping, sustainable drainage system (SuDS), and associated works with all
matters reserved save for access.**

Having read through the submitted documents I am concerned that some species surveys are still outstanding, the submitted metric is incorrect and needs amending and the proposal fails to demonstrate the mandatory 10% BNG on site, which, for a greenfield site, is disappointing and should be avoided. Detailed comments are as follows;

The May 2025 Ecological Impact Assessment (EclA) states that a suite of targeted species surveys are scheduled for 2025 to confirm detailed mitigation and compliance with applicable legislation where relevant. Bat and breeding bird populations at the site have been identified as important at the Local level, subject to completion of surveys in 2025.

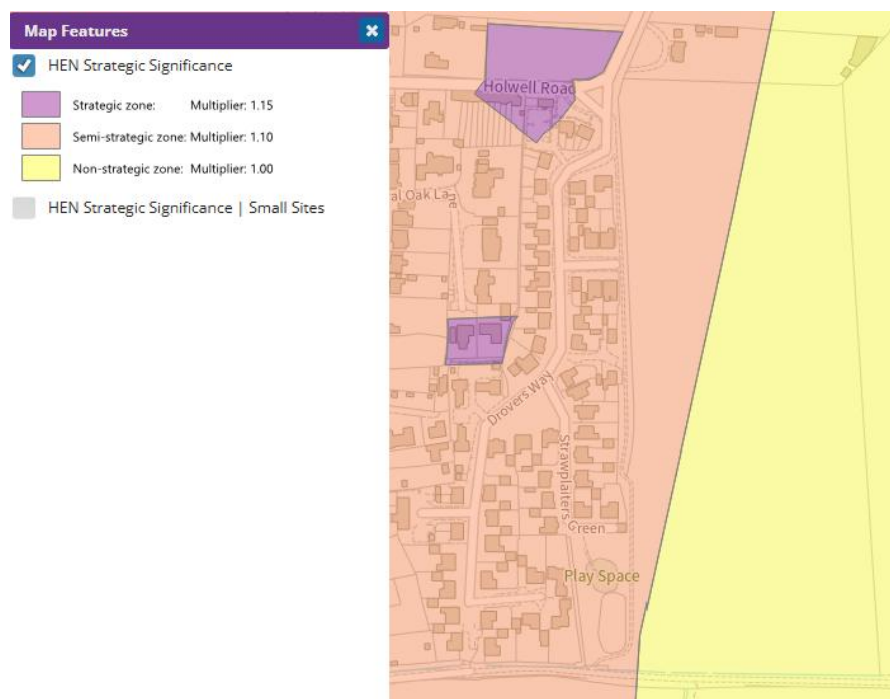
Not all surveys have been completed, awaiting eDNA results for GCN and the report states further survey work is scheduled to be undertaken later in 2025, being, Bat activity surveys, Breeding bird surveys, Reptile surveys. Understanding the potential impact of the proposal is essential for decision making so it is expected all surveys will be provided prior to determination.

4.15 of the EclA states 'Field margins are narrow (c. 1-2m) and comprise other neutral grassland' and yet the submitted metric does not account for this with just 2 area habitats listed. 2m field margins around the site periphery would equate to 0.2 Ha $\approx$ 1.8 units which should be accounted for.

Broad Habitat	Habitat Type	Irreplaceable habitat	Area (hectares)
Cropland	Temporary grass and clover leys	No	6.44
Urban	Developed land; sealed surface	☐ No	0.21

Further, 'frequent bramble' is referred to which, in UK Hab, is not included in grassland species mixes so should be recorded as scrub.

4.2 of the May 2025 Biodiversity Net Gain Assessment states the Hertfordshire Ecological Network Map has been reviewed and all of the baseline habitat units are assigned as 'Low' strategic significance but the excerpt below disagrees with this. Until the LNRS is published applicants are advised that the HEN map should be used instead to assess strategic significance. Therefore, Metric calculations are incorrect as part of the site is in a semi-strategic zone with the land identified for enhancement in a non-strategic zone.



The priority habitats map in the EclA identifies a traditional orchard to the north of the site and it would be valuable to pick up on this with any landscaping design for this proposal. The EclA also acknowledges that 'The greatest ecological interest is associated with the hedgerows.' the acknowledgement in the DAS for 12m buffers to existing hedgerows is welcomed.

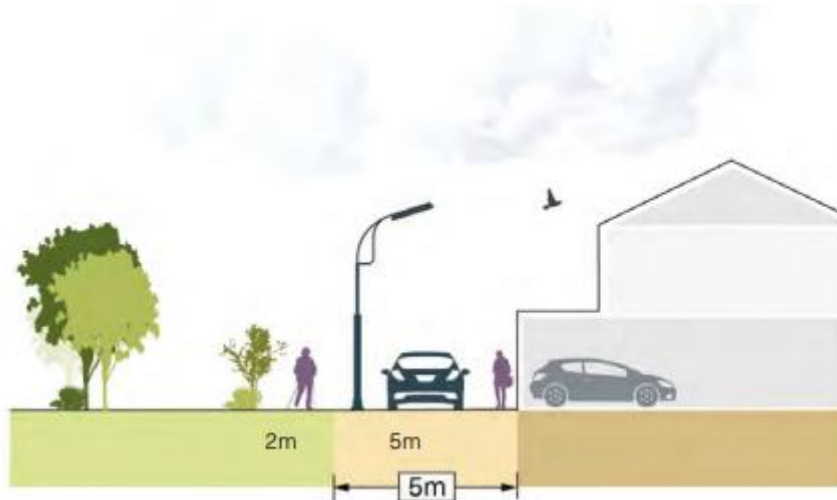
H6, on the southern boundary, is classified as an important hedgerow due to its age and presence of red/amber listed bird species recorded in the breeding bird surveys undertaken in 2025 and it's positive to see this identified as an opportunity for strengthening and enhancement.

However, the proposed development will result in severance and the loss of a section of hedgerow H3 for site access, resulting in a reduction of foraging opportunities and connectivity. The site is currently unlit, new artificial lighting of retained habitat during the construction and operational phases may lead to adverse disturbance impacts to bats and other nocturnal wildlife, with a reduction of use and diversity in these areas.

The hedgerow network provides navigational opportunities and connectivity between the site and wider landscape. Of the bat surveys undertaken to date Barbastelle bats have been recorded (ML2) on the eastern boundary – these are light sensitive so more information is needed prior to determination. Note, there was no monitoring location on western hedgerow which will be impacted. This is concerning as it is impossible to determine the impact of severance here. Even if the gap is limited to 10m, a distance often acceptable as a 'hop over' which bats can still navigate, what will street lighting be here?

The ecological report advises to maintain ecological functionality of retained and proposed habitats for nocturnal wildlife, a sensitive external lighting scheme should be prepared to ensure dark corridors are maintained available for nocturnal wildlife. I agree with this but it must be adequately informed by surveys.

It is concerning that the DAS section on street typology shows each example with streetlights, even the private drives where the EclA expresses the importance of retaining dark corridors for wildlife.



There is an interesting statement in 4.68 in relation to the bird interest on the site with it being '*...adjacent to a residential area and has evidence of informal access by local residents. Due to the close proximity and resultant disturbance from the adjacent development, the Site is unlikely to support wintering birds.*'. The same could be said of the next field along which has skylark recorded on it amongst other birds – how will this proposal impact those species with disturbance leapfrogging along? Something that does not appear to be addressed in the EclA.

I raised concern with the application initially, advising NHC should have a draft biodiversity gain plan providing information as to how the development has addressed the biodiversity mitigation hierarchy and how it is intending to meet the BNG objectives to support an application of this size which could be contained in the BNG Assessment. The response from the applicant was, '*... that is a legal obligation that the application site has to fulfil. The application is in outline and the accompanying reports reflect that. Once full details are known at Reserved Matters stage and all on-site measures are calculated and secured the final requirements for any off-site units will be known. As set out in the report these will be secured by HMMP.*'. Two points here;

1. In concluding the DAS states '*On-site biodiversity will be enhanced through the naturalistic landscaping of the open spaces, retention of existing features and creation of new habitats*'. Yet the scheme fails to meet the mandatory BNG of 10%, only achieving 4.38% with the current metric (which I feel is incorrect). Considering this is a greenfield site I do not feel that is acceptable.
2. A Habitat Management and Monitoring Plan (HMMP) is needed so NHC can determine the costs of monitoring for s106 and for that we need a HMMP. I presume that needs to come before determination?

Finally, for information, the site is on the edge of the North Chilterns Partnership area, this seeks opportunities to work to improve the quality, condition and connectivity three key habitat types found in the area and to connect and extend these at landscape scale: The chalk

escarpment, chalk streams and woodland and scrub. The latter could be supported by appropriate landscaping on the application site.

