

Naomi Reynard
Planning Officer
Development Management
North Herts Council
PO Box 10613
Nottingham NG6 6DW

Hertfordshire LEADS
Hertfordshire County Council
Farnham House
Six Hills Way
Stevenage
SG1 2ST

www.hertfordshire.gov.uk

Contact: Bernie Fleming
Tel: tbc
Email: ecology@hertfordshire.gov.uk
Date: 16 June 2026

Dear Naomi,

[25/01902/DOC](#)

Details reserved by Condition 27 (Swift boxes and bat bricks) of planning permission reference 22/02628/FP granted on 17.03.2025

Land at 1-36 Freemans Close, Hitchin, Hertfordshire SG5 2PA

ECOLOGICAL IMPLICATIONS

Overall Recommendation

- ☒ Further information and/or amendments required before application can be determined.

Summary of Advice

- Condition 27 cannot be discharged as submitted as
- insufficient information has been provided to demonstrate that the proposed lighting scheme will avoid unacceptable illumination of bat roost features
- further details, including lighting levels at bat box locations and any necessary design amendments, are required, and
- a possible alternative approach is described
- Comments made here do not necessarily imply that if the lighting scheme is modified as suggested that Condition 11 can be automatically discharged.

Supporting documents

I have made particular use of the following documents in providing this advice:

- Integrated Swift and Bat Box Location Plan Dwg Title: M10290- HUN- A- 40-1013 (25 May 2025) Hunters
- S38 Street Lighting Design Dwg No. MMA19265/001 (12 March 2025) MMA
- Environmental Impact Assessment & Lighting Design Category Selection Process Project Number: MMA19265 (13 March 2025) MMA
- Outdoor Lighting Report (12 March 2025) MMA

Comments

Thank you for your letters of 22 December 2025 and 15 May 2026 which refer, and for consulting Herts LEADS (Ecology); I apologise for the delay with this reply.

Ecological assessment

The submitted lighting details have been reviewed in relation to the proposed bat box locations.

The scheme appears to have been designed to meet highways standards, with average light levels of approximately 5-6 lux and minimum levels exceeding 1 lux. However, no information has been provided to demonstrate light levels at the proposed bat box locations.

Given the proximity of 6m lighting columns to building façades, it is likely that a number of bat boxes - particularly those on south and west elevations - would experience levels of illumination above those typically considered acceptable for roosting bats (0.5 to 1.0 lux). In addition, the use of 4000K lighting contrasts with current best practice for bat-sensitive design (ideally 2700K).

In the absence of evidence (e.g. isolux overlay or point lux values), it cannot be concluded that the proposals will avoid impacts on the proposed bat boxes (and the anticipated roosts).

Recommendation

Prior to discharge, the applicant should provide:

- Evidence of predicted light levels at all bat box locations (demonstrating levels are suitably low, typically ≤ 1 lux); and
- A revised layout where necessary to reduce lighting impacts on bat boxes.

An indicative alternative distribution of bat boxes, which may assist in addressing these issues by relocating certain bat boxes allowing fewer amendments to the proposed lighting, is provided at Appendix 1.

Conclusion

Insufficient information has been provided to demonstrate that lighting impacts on bat boxes have been adequately addressed. The condition should not be discharged until the above information is submitted and agreed.

Comments made here do not necessarily imply that if the lighting scheme is modified as suggested that Condition 11 can be automatically discharged.

Yours sincerely,

Bernie Fleming, Ecology Advisor, Hertfordshire LEADS

Hertfordshire LEADS provides Landscape, Ecology, Archaeology, Design and Sustainability support to planning departments in Hertfordshire.

Creating a cleaner, greener, healthier Hertfordshire

Appendix 1 – Indicative Bat Box Redistribution

The following indicative redistribution is suggested (based on a total of approximately 25 bat boxes):

This approach provides a mix of roosting conditions while reducing lighting impacts. Final locations should be informed by confirmation of predicted lux levels at each bat box position.

New locations should not be shaded by adjacent buildings.

The services of a professional and suitably experienced ecologist should be retained to advise on the specific locations chosen and reference made as to how all the proposed locations meet (or fail to meet) established best practice.¹

If chosen carefully, the suggested locations should provide a range of microclimates increasing the chance that some if not all bat boxes will be colonised.

South-facing elevations (~10–11 boxes retained)

- Retain only in the least illuminated sections of façade
- Avoid proximity to lighting columns, entrances, and active frontages
- Maintains thermally favourable roosting opportunities

East-facing elevations (~10–11 boxes relocated)

- Relocate approximately half of the boxes to east-facing façades where lower lighting levels are likely
- Prioritise locations with some solar access and limited overshadowing from adjacent buildings
- Avoid narrow or heavily shaded courtyard elevations

West-facing elevations (0 boxes)

- Remove all bat boxes due to higher likelihood of illumination during peak bat activity periods

¹ Bats and Artificial Lighting Guidance Note GN08/23 (2023) Bat Conservation Trust and Institute of Lighting Professionals