

Officer Liz Anderson – Ecologist

Date 19/05/2026

Ref: 26/00805/FP

Att: Harriet Sanders

Land At, London Road, St Ippolyts, Hertfordshire,

Erection of 5 detached dwellings including garages, parking, landscaping, bin stores, installation of Air Source Heat Pumps and alterations to existing vehicular access off London Road.

Consultee comments

Thank you for consulting me, having looked at the submitted documents, I am disappointed to see pre-emptive site clearance but grateful that the BNG assessment can be based on the pre-cleared state of the site. The submitted Statutory Metric identifies the biodiversity baseline as 4.79 Habitat Units with the post-development resulting in the loss of 3.10 Habitat Units equating to 64.6%. In order for the development to meet the mandatory requirement for 10% BNG offsite units will need to be purchased.

Part 6.51 of the planning statement refers to North Herts Local Plan policy NE4 and says it is 'an important consideration'. NE4 states, '...12 metres of complimentary habitat should be provided around wildlife sites (locally designated sites and above), trees and hedgerows...', however this application fails to achieve such separation, particularly in relation to Plot 4 where the garage encroaches into the RPA of an offsite Horse Chestnut, T15.



The October 2025 Preliminary Ecological Appraisal & Roost Assessment (PEARA), updated in April 2026, advises no bat roosts were identified on site but '*habitats recorded on site were assessed to provide foraging and commuting opportunities for bats*'. The proximity of the existing trees and hedgerows to the windows from Plot 4 could result in a detrimental impact on bats using this corridor. I would like to suggest a sensitive lighting strategy is conditioned but doubt impacts can be fully mitigated given the minimal separation distances.

A lighting design strategy for biodiversity for the site shall be submitted to and approved in writing by the local planning authority. The strategy shall;

a) identify those areas/features on site to which bats and other nocturnal species are particularly sensitive and that are likely to cause disturbance in or around their breeding sites and resting places, or along important routes used to reach key areas of their territory, for example, for foraging,

and b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Recommendations are made for ecological enhancements and, in conjunction with North Herts Local Plan policy NE4, the following condition is advised;

No development shall take place until an Ecological Enhancement Plan (EEP) for the creation of new wildlife features including integrated bird/bat and bee bricks in buildings/structures (swift bricks should be used where building heights allow), hedgehog holes in fences and hibernacula has been submitted to and approved in writing by the local planning authority.

The case officer should note Biodiversity Gain condition wording should be added to the decision notice, the biodiversity gain condition is a pre-commencement condition having its own separate statutory basis and is deemed to apply to every planning permission granted for the development of land in England. To ensure the applicant is clear about this distinction the biodiversity gain condition should not be included in the list of conditions imposed in the written notice when granting planning permission but should remain separate.

Biodiversity Net Gain

*The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition "(the biodiversity gain condition)" that **development may not begin** unless:*

(a) a Biodiversity Gain Plan has been submitted to the planning authority, and

(b) the planning authority has approved the plan.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be North Herts Council.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply.

Based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply.