

Officer Liz Anderson – Ecologist
Date 4/11/2025

Ref: 25/02401/OP
Att: Paul Chaston

Land South Of Turnpike Lane, Ickleford, Hertfordshire,

Erection of up to 100 dwellings with means of access from Turnpike Lane including associated landscaping, drainage, car parking; infrastructure and all ancillary and enabling works following demolition of all existing structures (all matters reserved except means of access)

Consultee Comments

In 2023 North Herts Council declared an ecological emergency to recognise the seriousness of ecological crisis and ensure that nature recovery is a priority for the council.

In 3.8.1 The planning Statement claims *'The application is submitted by a full suite of ecological surveys which demonstrate that there are no ecological impacts which cannot otherwise be mitigated. Furthermore, the scheme will deliver a minimum of 10% biodiversity net gain.'*

This is incorrect as the September 2025 Ecological Impact Assessment (EclA) states that bat surveys remain ongoing and survey results will be submitted, these appear to still be outstanding. The presence of a protected species is a material consideration, understanding the potential impact of the proposal is essential for decision making and this cannot be done without complete survey data.

This proposal fails to demonstrate the mandatory 10% BNG on site, which, for a greenfield site, is disappointing, the aim should be to achieve a 10% increase in biodiversity directly on-site, avoiding the loss of habitats. The submitted Metric shows a negative impact as a result of the proposal with 14.56% loss of biodiversity units indicating that development here is inappropriate.

Habitat creation on site includes medium distinctiveness habitats which are classed as significant and, as such, a draft Habitat Management and Monitoring Plan (HMMP) is required so NHC can determine the s106 costs associated with monitoring.

The EclA claims presence of GCN unlikely but advises an updated eDNA survey in 2026. If the applicant wishes to use the Natural England Great Crested Newt District Level Licensing (DLL) scheme this must be done at the time of the planning application, and an Impact Assessment and Conservation Payment Certificate (IACPC) needs to be submitted. With DLL, the Council needs to see the IACPC countersigned by NE prior to determination to show the applicant has agreed to join the scheme, no signed certificate is provided and therefore we would need full

GCN survey data to be provided to fully understand the impact of the proposal on a protected species.

North Herts Local Plan Policy NE4 calls for 12 metres of complimentary habitat to be provided around wildlife sites (locally designated sites and above), trees and hedgerows. Advising it may be necessary to exceed this distance for fragile habitats such as ancient woodland or to provide appropriate root protection for mature trees. Whilst I appreciate this is an outline application, the indicative masterplan shows development extending well into this buffer in the east and hence is not policy compliant.

Further, the EclA records surveys identifying main, annex and several outlier badger setts on site. As such the proximity of any development would need a much further offset from the woodland, greater than 12m for NE4 to ensure that future conflicts with householders and badgers won't arise.

As it currently stands however, there's insufficient information available for me to make fully informed comments.