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6 August 2026

Dear Naomi

Application number: 25/03080/HYA

Location: GA2, Land North-East of Great Ashby Stevenage Hertfordshire

Proposal: Hybrid application for a residential-led development comprising residential (Use Class C3), educational use (Use Class F1), a community hub (Use Class F2) with associated new internal roads, access, parking, cycling infrastructure, landscaping and other associated infrastructure. Full application comprises the construction of vehicle access and an active travel link via Mendip Way, with associated landscaping and drainage works. The outline application, for which all matters are reserved except means of access, comprises the erection of up to 640 dwellings (Use Class C3), a site for a primary school, further land reserved for educational use (Use Class F1), a site for a community hub (Use Class F2), with associated infrastructure.

RE-CONSULTATION

Thank you for re-consulting HMWT about this application. We have considered in particular the letter from Icenl dated 16 July 2026 and the document from CSA 'Ecology matters raised during consultations and further mitigation measures' dated April 2026.

It seems to us that there are still a number of matters which are unresolved or unclear.

Habitat buffers. The applicant has provided 15m buffers around ancient woodland and woodland habitats as Natural England and ourselves recommended, although we note that what is a 'minimum' standard has been characterised as 'the' standard in the applicant's comments, which is disappointing. Other objectors have made the point that good practice suggests a much wider buffer from residential development. However, our point was concern about the number of incursions into the buffers, largely as a result of access roads penetrating ecological features. This has an impact on ecological connectivity, as discussed below. The proposal has not changed in the revised application, so we still consider it to be non-compliant with Policy NE4 of the North Hertfordshire Local Plan.



Creating a wilder Hertfordshire and Middlesex

The Hertfordshire and Middlesex Wildlife Trust Limited (Herts and Middlesex Wildlife Trust), a registered charity in England and Wales (239863). A company incorporated and registered in England and Wales (company number 816710). President: Sir Simon A Bowes Lyon, KCVO. Chief Executive: Lesley Davies

Ecological connectivity. We note the applicant's comments about the detailed design discussions which have taken place on the road infrastructure to serve the development proposed. A key issue here is the isolation of Nine Acres Spring wood by roads and the bus loop. We recognise that certain mitigation measures have been put in place, including minimising road widths in key locations and extending woodland habitats. The CSA note refers to further provision of mammal tunnels and wider landscape connectivity along the northern boundary, but we are still concerned that the mitigation is insufficient and it is not clear what the latter involves (section 2.0).

We note Natural England's comment that 'We would however like to see greater emphasis on woodland corridors through (sic) the development, particularly connecting the central ancient woodland parcels to the North East and South West Woodland outside the red line boundary. Currently it appears there is limited woodland coverage resulting in reduced ecological connectivity which should be remedied with additional planting and buffering of sensitive woodland habitats.'

Although Natural England did not object to the proposal on the grounds of impacts on protected landscapes, they made a number of detailed comments which are not mentioned in the applicant's response (p7, Appendix A of Icen letter). While the plans include buffering of sensitive woodland habitats, it is not clear how or whether this point about woodland corridors has been addressed.

This illustrates to us that the design of the development has prioritised the infrastructure needs of a certain quantum of development rather than the needs of nature. A design which prioritised nature would ensure that Nine Acres Spring wood had enhanced connectivity with other woodland parcels and the wider countryside rather than less. The proposed mitigation measures are an implicit acknowledgement that there is a negative impact on connectivity, but are not sufficient.

A shortcoming of the Environmental Statement (ES) is that it assesses important ecological receptors individually, and while it proposes mitigation measures such as tree protection, buffers etc, there is no comprehensive assessment of the overall impact on ecological connectivity (as summarised at Table 9.6).

We conclude that, despite mitigation, the proposal has a significant adverse effect on biodiversity.

Following the mitigation hierarchy (NPPF paragraph 193(a) and Policy NE4 of the North Hertfordshire Local Plan), if significant harm to biodiversity cannot be adequately mitigated, it should as a last resort, be compensated for. The applicant needs to be clear what is proposed as mitigation and what is compensation. The off-site farmland bird habitat creation is clearly compensation (see below), and the ES refers to compensatory woodland planting for impacts on Brooches Wood Local Wildlife Site (Table 9.6), but otherwise it is not clear what measures are proposed to compensate for the loss of ecological connectivity. The CSA note, which is focussed on badgers, only deals with this point very briefly. If compensation is inadequate, then planning permission should be refused.

Other matters

We welcome the commitment to provide an **ancient woodland recreational management plan** at detailed design stage. This should be secured by a condition in the event that planning permission is granted.

We previously welcomed the ambition for **biodiversity net gain**, which should be secured by condition and/or legal agreement. However, the applicant's response in Appendix A of the Icen

letter (p15) to the objection by Great Ashby Community Council appears to be about a different matter, so it is unclear what the applicant's position is.

On **swift bricks**, the applicant notes that these will be secured by a planning condition. As noted in the ES, these should be provided at a ratio of one per dwelling (which could be grouped on those dwellings most appropriately located) as also recommended by National Planning Practice Guidance, and conditioned accordingly.

We welcome the identification of the land for **off-site farmland bird compensation**. We note from the ES that the field is going to be sown with a wild bird seed mix but suggest that consideration should be given to providing Skylark plots within the field to ensure that there is suitable compensation for the loss of breeding Skylark territories within the application site. As we commented previously, all ecological mitigation, compensation and enhancement measures should be secured through suitable planning conditions and/or a legal agreement, but it is particularly important to secure the off-site compensation in perpetuity through a legal agreement.

As previously, we defer to the expertise of the Badger Trust and others concerning the impact on **protected species**.

Please contact me if you wish to discuss any of these issues in further detail.

Yours sincerely

A black rectangular box redacting the signature of Simon Marsh.

Simon Marsh MBE BA MA MSc MRTPI
Planning and Policy Manager