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16 July 2026

Our ref: 22/268
SUBMISSION VIA EMAIL

Dear Naomi,

RESPONSE TO CONSULTEE COMMENTS AND APPLICATION UPDATES: GA2, LAND NOTRH OF GREAT ASHBY, STEVENAGE, HERTFORDSHIRE (APPLICATION REF. 25/03080/HYA)

We write on behalf of the applicant ('Picture Estates Limited') in relation to planning application ref. 25/03080/HYA for a proposed residential-led development at Land North of Great Ashby, Stevenage, Hertfordshire.

The purpose of this note is to provide an overview of the consultee comments on the planning application and to detail how the Applicant has sought to address the comments, where required (**Appendix A**). Additionally, following discussions around the use of the community hub, we are also seeking to update the current description of development, as set out in Section (a) below.

For ease of reference and for the benefit of the case officer, we also enclose a list of previously submitted drawings and their reference and revision numbers, along with the updated references (**submitted under separate cover**).

a. Description of Development Amendment

Following a meeting on 25 March 2026, further information on the layout and design of the community building was requested. As it stands, the description of development only allows for the community hub to be brought forward as Use Class F2. The current description of development is as follows;

*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.*

Use Class F2 is a narrow use class that only permits community uses such as shops, local halls and areas for outdoor sport or recreation. However, creating active and vibrant centres within new housing developments is a common challenge for town planners, developers and local communities. A wider range of suitable uses exist to support both new and existing residents but these fall outside Use Class F2. To maximise the attractiveness and value of the community hub, and to allow the floorspace to respond flexibly to different users and needs, it is proposed that Use Class E is incorporated into the description of development.

The community hub forms part of the outline element of the application and therefore further details will be brought forward as part of a subsequent Reserved Matters application/s. Whilst we appreciate there have been several suggestions for its use from consultees, we are not able to confirm the exact or proposed uses until a time when the Reserved Matters is being prepared, as demand will always change over time. As agreed, to enable a facility that can flexibly accommodate uses such as healthcare and office, it has been agreed that the description of development would be updated to reflect this as below:

*Hybrid application for a residential-led development comprising residential (Use Class C3), educational use (Use Class F1), **a community hub (Use Class F2/ Use Class E)** 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/ Use Class E)**, with associated infrastructure.*

Parameter plans have been submitted showing the proposed indicative location of the community hub, as well as an indicative height of three storeys. An area of 0.2 ha (equivalent to 2,000 sqm) has been earmarked for this development, which provides ample space to satisfy the SP18 requirement of 500 sqm net of neighbourhood level facilities. This is already outlined within the Planning Statement and as noted on page 24, the exact details of this will come forward at Reserved Matter stage depending on the demand at the time. Therefore, sufficient information has been provided to satisfy the outline element of the application.

b. Accordance with Site Allocation and Masterplan

The proposed development accords with the adopted North Hertfordshire Local Plan (2022), which allocates the site for residential-led development, and has been designed in accordance with the Masterplan approved by Full Council in November 2024. The principle of development has therefore been established through the development plan process, and the application demonstrates compliance with the relevant strategic and detailed planning policies. Accordingly, planning permission should be granted in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004.

Without prejudice to the above, it is also recognised that the Council's latest published housing land supply position identifies a significant shortfall. Accordingly, the proposal would also make an important contribution towards addressing identified housing needs and is consistent with the presumption in favour of sustainable development set out in the NPPF (2024).

Summary

We request that the Council accept these submission documents and reconsult the relevant parties as soon as possible.

Should you require any further information, please do not hesitate to contact either myself at Katrina Corrigan (kcorrigan@iceniprojects.com | 07345426632) or my colleague Silke Gruner (sgrunner@iceniprojects.com | 07840178777).

Yours sincerely,



Katrina Corrigan
PLANNER

APPENDIX A: Summary of Consultation Comments Received and Responses



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Comments and Status	Response
Thames Water (<i>No Objection with Observation</i>) – 28 January 2026 Thames Water has reviewed this H4 consultation. Your client may require a build over agreement, as we believe the proposed development could be within 3 metres of a public sewer (of which, the internal diameter is less than or equal to 150mm). There are no mapped public sewers in the vicinity, however following the private sewer transfer in October 2011, it is likely that houses of this type and location will have unmapped public sewers within their boundary. We therefore strongly recommend your client employs a professional to conduct a survey within their property to ascertain if any shared pipework is present. If there is, then please do contact us again to discuss the next steps.	Woods Hardwick, the engineers acting on this project, have reviewed Thames Water's comments and confirmed that, based on the detailed topographical survey and Thames Water's record plans, there are no sewers within the site boundary that would be affected by the proposed development. We acknowledge that Thames Water apparatus is present within the highway land included within the application red line boundary. This infrastructure will be accurately located and assessed during the detailed S278/S38 design stage, and any necessary protection measures will be agreed and implemented in consultation with Thames Water.
Anglian Water (<i>No Objection</i>) – 29 January 2026 No comments to make as the application lies outside of Anglian Water's sewerage boundary.	No action required.
Affinity Water Limited (<i>No Objection with Suggestions</i>) – 30 January 2026 There were no issues relating to the planning application. There are actions required if permission is granted: There are potentially water mains running through or near to part of proposed development site. If the development goes ahead as proposed, the	No action required at this time.

applicant/developer will need to get in contact with our Developer Services Team to discuss asset protection or diversionary measures. This can be done through the My Developments Portal (https://affinitywater.custhelp.com/) or aw_developerservices@custhelp.com. Due to its location, Affinity Water will supply drinking water to the development in the event that it is constructed. Should planning permission be granted, the applicant is also advised to contact Developer Services as soon as possible regarding supply matters due to the increased demand for water in the area resulting from this development.	
HCC Minerals and Waste (<i>No objection</i>) – 05 February 2026 The types of waste projected to arise from the build phase, as well as predicted quantities, have been detailed. This is coupled with space for actual waste arisings to be recorded and explanations for any differences between the amounts within the table. The Waste Planning Authority is satisfied with the level of detail included within the submitted SWMP, and therefore the attachment of a SWMP condition is not required.	No action required.
Herts Fire and Rescue Services (<i>No objection subject to condition</i>) – 03 February 2026 Hertfordshire Fire and Rescue service (hydrants only) will require a condition for the provision and installation of fire hydrants, at no cost to the county council, or fire and rescue service.	No action and condition is accepted.
Sport England (<i>Objection</i>) – 05 February 2026 A financial contribution has been requested towards off-site indoor and outdoor sports facility provision secured through inclusion of a planning obligation.	Discussions on S106 contributions are ongoing. The requested condition to demonstrate Active Design principles is noted.

A condition has also been requested in relation to details on how Active Design principles have been considered in the design and layout of reserved matters application.	
Herts County Council Fire Service <i>(No Objection further information requested) – 05 February 2026</i>	This comment was addressed in meetings with the Council, it appears plans were missed when Herts Fire Service reviewed the application. The Case Officer noted the relevant plans to the team however no confirmation on these have been received.
Great Ashby Councillor – Laura Williams <i>(Objection) - 06 February 2026</i> Comments received relate to the proposed highway arrangements, particularly in relation to the rerouting of Mendip Way to provide access to the new development. Cllr Williams notes there is an absence of credible evidence that the existing road network can safely accommodate the cumulative impact of GA1 and GA2.	Significant engagement with Local Highway Authority have been carried out to date. To address both these comments and those received from Hertfordshire County Council, further work has been carried out on the junction modelling within the Transport Assessment by Woods Hardwick (April 2026). Technical reconsultation was had on this document which has been accepted by the Highways Authority.
Natural England <i>(No Objection) – 10 February 2026</i> It was noted that based on the plans submitted, it is acknowledged by Natural England that the proposed development will not have adverse impacts on protected landscapes.	No action required.
Environment Agency <i>(No Objection) - 11 February 2026</i> The EA had no comments to make on this application.	No action required.
Hertfordshire Environmental Sustainability (Archaeology) <i>(No objection subject to condition) – 16 February 2026</i> No objection however a condition requesting further trial trenching was requested.	A pre-application meeting was held with the Archaeology Officer prior to the submission of the application. In accordance with the advice provided, two phases of archaeological trial trenching were subsequently undertaken. Following receipt of the consultation response, an additional meeting was held with the Archaeology Officer to discuss the requirement for additional investigation identified within the comments. It was agreed that additional trial trenching would be undertaken within the proposed biodiversity net gain area to the north-west of the site.

	An archaeological strategy has been submitted to the Archaeology Officer and, following approval, an additional Written Scheme of Investigation has been prepared by Iceni Projects and is currently awaiting sign-off. This is intended to secure the necessary works prior to determination and avoid the need for a planning condition relating to the additional trenching.
Active Travel England (<i>No Objection subject to recommendations conditions</i>) – 17 February 2026 Active Travel England does not consider deferral to be proportionate in this instance. The application is supported by a substantial and robust evidence base, and the principal deficiencies identified relate to matters of detail, certainty and enforceability rather than to structural or locational failings Several conditions were recommended around walking and cycling improvements that were identified within the Accessibility Audit, ensuring Reserved Matters applications demonstrate pedestrian and cycle priority and full compliance with LTN 1/20.	No actions and conditions noted and will be discussed further following HCC Highways response.
NHC Housing Development Officer (<i>No objection</i>) – 18 February 2026 Comments noted the requirement for housing mix and size based on the most recent Council evidence base. It was noted that 40% affordable housing is required on sites providing 25 dwellings or more. If the development is phased, each phase will required 40% affordable housing to ensure a mixed community. The provision of C3 units for olde persons area required as per policy. It was also noted that parking courts are not desirable due to residents wanting to park outside or near their homes.	The comments are noted and will be addressed at detailed design stage.
National Highway (<i>Permission not be granted for 3 months / No Objection</i>) – 18 February 2026 / 27 April 2026 18 February 2026:	Initial comments from National Highways were received and addressed through updates to the Networks Diagrams, Technical Note, trip distribution information and response covering letter prepared by Woods Hardwick. This underwent a technical consultation which led to National Highways lifting their objection.

It is noted that in the submitted Transport Assessment (TA) that Appendix N denotes traffic flow diagrams. However, there are still significant flows which travel beyond the extent of the diagram. In the cases above, the flows of 263.31 at J11 towards Martins Way and 79.26 at J13 towards Orwell Avenue are not shown further, and both routes can lead to the SRN, specifically Junction 8 of the A1(M). No analysis of how the development will impact this junction, nor how many trips are modelled to arrive at this junction has been carried out. 27 April 2026: Satisfied that the proposal would not materially affect the safety, reliability or operation of the strategic road network.	
Ramblers Association (<i>No objection with requested suggestions</i>) – 19 February 2026 Concerns have been raised regarding the impact of construction activities on Public Rights of Way (PRoWs) and the need to ensure that public access is maintained wherever possible. Any temporary closures required to facilitate essential works would need to follow the appropriate legal process, including obtaining the necessary permissions and publicising proposed diversions where required. Concerns were raised around footpath 11 and the fact it follows a strange route. Requests to address the anomaly were presented and notes on there not being a safe route across the road from Grampian Place.	A Construction Management Plan will form part of a suitably worded condition. Within this there will be details of the temporary routes and the measures in place to ensure construction and public areas are suitably separated. The Public Right of Way Management Plan provides the proposed route for footpath 11. The Means of Access plan also provides details for the proposed access points from Grampian Place across Mendip Way and the connection to the south.
Weston Parish Council (<i>Objection</i>) – 18 February 2026 Requests for a legal obligation to protect the emergency access route.	We do not agree that this is necessary and will instead be recommending a condition be put forward to secure the design.

It was also noted that a proper traffic survey is conducted to assess the realistic impact of the development on traffic volumes along Back Lane. It was noted that the redline boundary has been extended beyond the redline boundary within the Local Plan allocation. It is recommended these areas be noted as beyond the site boundary. It was suggested that the northern boundary be reinforced by planting hedgerows to differentiate from the remainder of the Green Belt. Lastly, there were concerns around the objective of the additional fields being included in the proposals to the north. It was requested that greater clarification of these areas be provided.	Extensive liaison has been undertaken with Hertfordshire County Council Highways and the Senior Transport Officer throughout the preparation of the application. The Transport Assessment includes traffic survey data, and the scope of junction assessments was agreed with the Council at the outset. Back Lane was not identified as a junction requiring assessment. Furthermore, National Highways has reviewed the submitted assessment and raises no objection to the proposed development. This comment is noted, however applications for allocated sites can be expanded and differ from the land allocated. The areas noted within the response are being used for biodiversity net gain features and therefore need to be included within the redline boundary. As such, amending labels will not be appropriate. Key boundary hedgerow and thicket planting is proposed along the majority of the norther edge of the site. The boundary is further reinforced by the existing public right of way which also forms a divide between the development and Green Belt. Please refer to the Green Infrastructure Framework Plan. This comment is noted. The area in question forms part of the outline element of the application and further details will therefore come forward at detailed design stage.
British Horse Society (Objection) – 18 February 2026 It has been requested that a number of footpaths be upgraded to bridleways	Our response to both the British Horse Society and Footpath Unit have been combined given their similar nature. A significant amount of work has been carried out to ensure permeability into the site from existing public rights of way whilst also ensuring the continuation of public rights of way within the site. It is important to note this is an outline application, and specific details of bridleways and footpaths will be provided at the detailed design stage.
Rights of Way (Footpath Unit) (Objection) – 19 February 2026 The routes shown on the masterplan do not align precisely with the Definitive Map in several locations. Clarification is therefore required as to whether these deviations are intentional (e.g. to provide parallel routes), indicate a proposed diversion of the Rights of Way (subject to the same requirements as Graveley 011), or are simply errors to be corrected in future plans. Improvements to several of the PRowS to upgrade to bridleways have also been requested:	Additionally, a number of the footpaths that have been requested to be upgraded to bridleways do not link into existing designated bridleways. Footpath 44 has the potential for the status to be upgraded to a bridleway and is within the redline boundary, however there is only space for a 2m wide footpath in this location within the application boundary. Further details will be presented at detailed design stage.

Weston 029 - upgrade to Bridleway status including physical improvements to create either a 6m total width route consisting of 3m unsealed surface with a 3m grass amenity strip, or, a 4m total width consisting of an unsealed surface. Weston 026 - upgrade to Bridleway status including physical improvements to create either a 6m total width route consisting of 3m unsealed surface with a 3m grass amenity strip, or, a 4m total width consisting of an unsealed surface. Weston 023 - upgrade to Bridleway status including physical improvements to create either a 6m total width route consisting of 3m unsealed surface with a 3m grass amenity strip, or, a 4m total width consisting of an unsealed surface. Weston 044 - upgrade to Bridleway status including physical improvements to create either a 6m total width route consisting of 3m unsealed surface with a 3m grass amenity strip, or, a 4m total width consisting of an unsealed surface. A figure of £2,300,000 has been requested for these improvements.	Regarding the alignment of the PRowWs with the masterplan, this has been updated to reflect the correct placement of the footpaths, however it should be reiterated that there are areas where the footpath may need to be amended depending on the future reserved matters applications. This is portrayed within the Public Rights of Way Framework Plan. Whilst S106 discussions are being progressed separately, the Applicant considers that this contribution does not satisfy the tests in paragraph 58 of the National Planning Policy Framework (2024), as it is neither necessary to make the development acceptable nor fairly and reasonably related to it. Several Public Rights of Way within the site will already benefit from significant enhancements, including improved surfacing, widths of between 2–5 metres, and increased accessibility for pedestrians and cyclists. In addition, Footpath 23 is not connected to the site or the wider PRow network serving the development, and improvements to this route would not provide a direct benefit to the proposed scheme. The request to upgrade all identified Public Rights of Way to full bridleway standard, including continuous corridors of 4–6 metres in width, is disproportionate and unsupported by the planning policy framework applicable to the site. Neither the adopted Local Plan allocation nor the approved Masterplan requires such an approach. Imposing a uniform bridleway specification across the site would unnecessarily constrain the detailed design process and reduce the flexibility needed to integrate movement, landscape, biodiversity, drainage, public open space and residential development in a coordinated manner. The Applicant therefore considers that the extent of the upgrading sought exceeds what is necessary to make the development acceptable in planning terms and is neither proportionate nor justified for a policy-compliant scheme that accords with the adopted allocation and approved Masterplan.
HCC Highways (<i>Further information requested</i>) - 26 January 2026/ 05 March 2026 26 January 2026: Tracking for a 12.2m long refuse vehicle was requested along with necessary updates to the bus tracking being required. Additionally, the referencing within the junction analysis has been noted as needing to be reviewed.	HCC Highways was consulted throughout the applicant's further analysis, with the strategy and objectives of the assessment shared in advance. The analysis has now been completed, and the results have been shared with and acknowledged by HCC. A formal response is awaited.

05 March 2026: Further comments were received noting that the base junction models need to be rereviewed to fully understand the current situation, with larger differences in the data to be addressed.	
Gravelly Parish Council (<i>Objection</i>) – 20 February 2026 Concerns around the number of vehicles using Back Lane. Request for bollards/ gate to protect the emergency access from unauthorised vehicles. Concern around there being no provision for a GP practice. Local doctors are already over capacity and so is the hospital.	The Transport Assessment has been updated to incorporate the comments received from HCC Highways, including requests for further sensitivity analysis on the road network in Graveley and the wider highway network, also tested by HCC through its own consultant WSP through a detailed traffic analysis funded by the applicant. This provides updated junction modelling and assessment of key roads. The emergency access will be controlled by either bollards or a gate to prevent the access of unauthorised vehicles, as stated in the DAS. This will form part of a future Reserved Matters application. While there is currently no specified provision for a GP practice, the description of development has been amended to allow for the potential delivery of a GP practice within the proposed community hub. Should a GP practice not come forward as part of the development, a Section 106 contribution will instead be secured towards the improvement of existing healthcare facilities or the provision of a new facility.
Landscape (<i>No objection subject to condition</i>) – 22 February 2026 The submitted documents establish a proportionate baseline and sets out a strategic framework for delivery of the GA2 allocation. The Parameter Plans and Green Infrastructure Framework broadly reflect the principles of the adopted Masterplan Framework and provide an appropriate structure for built form, green corridors, woodland buffers and drainage infrastructure. A Design Code planning condition has been requested to ensure matters are secured at Reserved Matters stage, prescriptive details have been suggested to form this planning condition.	The comments are noted and a Design Code condition was expected and accepted.
National Grid (<i>No Objection</i>) – 23 February 2026	Noted and no action.

Only 6.73ha of accessible amenity green space is provided for ~1,500 residents, below Fields in Trust standards. Most of the headline open space figure consists of constrained semi-natural habitats. NE's requirements—2.3km circular walk, dog-related infrastructure, signage and management in perpetuity are not secured via S106. Hazel Doormouse While 2023 surveys indicate likely absence, the ES does not assess landscape-scale connectivity impacts of removing key hedgerows linking woodland parcels. Dormouse movement depends on continuous woody corridors, several proposed removals risk severance. BNG The BNG surplus is heavily dependent on counting 6.02ha of ancient woodland buffer scrub as habitat creation, despite this being mitigation rather than enhancement. Without it, the scheme may not achieve the required 10% BNG. No compensation is proposed for the five ancient woodland parcels, the HMMP remains largely incomplete, and no Section 106 agreement has been submitted despite being identified as necessary.	Plan. In total the level of accessible open space is 27.82ha, covering 44% of the sites area. A significant amount of work has been undertaken to maintain wildlife connectivity throughout the site. This includes the provision of badger tunnels, which are designed to be used by a range of species, alongside extensive new planting. Several woodland corridors are also proposed to strengthen ecological connections across the site and support the movement of wildlife. It is understood that the freehold of the land sits entirely with the Applicant's control and the easement deed relating to the overhead lines grants the electricity company the right to undertake cutting, felling, and coppicing of trees and vegetation that interfere with the statutory safety distance requirements from the lines, subject to three days' notice being given to the landowner. The maintenance of this area will be controlled under the Landscape Management Plan. In addition, the precise positioning of the new planting will be carefully determined during the next stages of the design process to ensure adequate access routes for maintenance vehicles and equipment, without adversely affecting the green spaces or habitats within those areas. The HMMP is a draft version to inform the outline application. A final HMMP will be submitted as part of detailed design. S106 discussions are being had separately.
Herts Wildlife Monitors (Objection) – 19 March 2026 Comments received were around the connectivity for wildlife between the woodlands. There was also concern on the proposed mammal tunnels proposed.	Our response to the comments regarding ecology have been combined into one uniform response as several of the responses overlapped. Appendix C (also submitted alongside the resubmission), provides a detailed response to the specific headline topics that were received. A meeting was also carried out with the Council's ecologist to discuss concerns and provide comfort that the areas raised could be addressed.

There were queries on whether an access point between Longdell Wood and the proposed school could have an access point from the southern edge. Further concerns were raised around the 'hop over' mitigation for bats, the various species of birds recorded and the tension between new residents and the wildlife present on site such as badgers. Concerns were also raised regarding the buffers to ancient woodland, with suggestions that these may be encroached upon, potentially affecting biodiversity and local flora and fauna. The location of the orchard was also highlighted as an issue, as it may encourage mammals to move through GA2 and cross a number of roads	Additionally, extensive correspondence has also been carried out with the Ecology Officer which has formed the basis for our formal response. Additionally, the area for the skylark mitigation is detailed within the Ecology chapter of the Environmental Statement. The grid reference has also been provided: TL 27271 27918. Appendix C has been provided to indicate the location of the skylark mitigation in relation to the site. An ancient woodland recreational management plan will for part of an appropriately worded condition. Additionally, a buffer of 15m around the ancient woodland areas have been factored into the indicative design of the proposals. The details of swift bricks will form part of a suitably worded condition.
Badger Trust (<i>Objection with recommended condition</i>) – 10 March 2026 The comments noted that In its current form, the proposals would lead to a significant impact on multiple established badger social groups, with the design and layout failing to adequately avoid harm to protected species or maintain ecological connectivity. The proposed road separating Nine Acre Spring Wood from Newberry Grove would sever an important wildlife corridor. The Environmental Statement indicates that some badger setts may be temporarily or permanently closed during construction. Given the presence of multiple active setts, including three main setts, this raises significant concerns. The application does not clearly identify which setts may be affected or how closure would be undertaken, whether temporary or permanent. We would object to any closure of main setts either temporarily or permanently. A condition has been requested if the Council are to approve the application to incorporate wildlife safeguards	It should also be noted that the access into the parcel adjacent to Longdell Wood has been moved further south as requested. This factors in root protection areas and the woodland buffer to the south which cannot be used as an access point due to the mature trees.
Herts & Middlesex Wildlife Trust (<i>Objection</i>) – 12 February 2026 / 12 March 2026	

The consultees initial comments originally noted 'no objection with recommendations' on the 12 February.

Ancient Woodland:

It is recommended that the applicant produce an ancient woodland recreational management plan and use a minimum 15m buffer around ancient woodland and woodland habitats, with an associated root protection zone in design plans.

Biodiversity Enhancements:

The ecological enhancements proposed at para. 9.289 (Ecology and Biodiversity Chapter, Environmental Statement) are welcomed but consider that the provision of Swift nesting bricks alone should be at a ratio of one per dwelling. We agree that features, including Swift bricks, could be grouped on those dwellings most appropriately located).

Conditions were requested to secure ecological mitigation, compensation and enhancement measures.

On the 12 March, a further comment was received noting an objection on three grounds:

1. Habitat buffer: it was noted that the Green Infrastructure Framework Plan shows a number of incursions into the buffers from access roads.
2. Ecological connectivity: It is noted that ecological features are breached by access roads, in particular Nine Acre Spring wood. Queries around whether the proposed mitigation is enough.
3. Protected species: Concern is raised about the impact on protected species, particularly badgers.

Herts and Middlesex Badger Group (*Objection*) – 12 March 2026

Concerns are raised over the proposals harming badgers and failing to provide adequate habitat for their future survival. Primarily, comments focus on concerns around insufficient attention to active badger clans, weak mitigation

measures, ineffective wildlife corridors, damaged habitat links, and poor ecological monitoring. It is requested that the proposed development be reduced to the eastern side of Nine Acre Wood, in order to allow connection with Newberry Grove. The plans for a community orchard and meadow are to be welcomed but not placed so badgers have to cross a road for reasons previously mentioned. Tunnels proposed are not placed appropriately so unlikely to do the job intended. If these are to become part of the development, we would also like a commitment on who is to maintain them.	
Historic England (<i>No objection</i>) – 17 March 2026 No advice or comments were necessary for this application.	No actions needed.
Hertfordshire Public Health (<i>No objection</i>) – 17 March 2026 Public Health notes that after completing a quality assurance review of the submitted HIA, that the HIA provides a proportionate assessment of the health impacts of the proposed development. I can confirm that this assessment is of high quality and there are no further revisions required.	No actions needed.
Growth and Infrastructure (<i>S106 requests</i>) – 20 March 2026 Comments relate solely to the planning obligations sought towards non-transport services.	These comments are subject to separate discussions being had on the Heads of Terms and S106 contributions.
East Herts Council (<i>No objection with requests</i>) – 07 April 2026 It is considered that the impact on the openness of East Herts' Green Belt would be limited. Notwithstanding this, in the event of approval it would be expected that views of the proposed development from East Herts boundary should be submitted for further assessment. It should also be noted that The Warren Wildlife Site lies approximately 100m from the site's south-eastern boundary, with an Area of Archaeological	A Landscape Visual Impact Assessment was carried out and submitted with the planning application. Within this, the Middle Bean Valley which adjoins the south-east of the Site are assessed. On page 41, the likely residual impact to this area is negligible (not significant). The site itself lies within an Area of Archaeological significance. As noted within the Environmental Statement Appendix 1, trial trenching and a geophysical survey was previously carried out, producing results that note there is a low potential for features

Significance located to the east. The proposals must therefore avoid any adverse impacts on these sensitive sites.	dating to prehistoric and Roman periods. The results of the evaluations carried out to date will additionally be used to refine an appropriate mitigation strategy if permission is granted.
HCC Environmental Health <i>(No Objection with conditions) – 07 April 2026</i> The outline document appears to be reasonably robust in this regard. However, a condition is recommended that a final version for approval be submitted prior to commencement of the development. submitted prior to commencement of development. Conditions relate to noise and contaminated land with an informative associated with EV charging points.	No actions needed and conditions accepted.
Place Services <i>(No objection) – 10 April 2026</i> It was agreed that less than substantial harm would occur to the two groups of listed buildings. Mitigation has been included within the scheme's illustrative layout to lessen the impact; however the outline nature of the application means that the level of harm may alter at the reserved matters stage. The distance between the listed buildings and the access point and active travel link from Mendip Way, for which full approval is sought, means that this element on its own is not considered harmful to the setting of either farm group.	No action needed.
NHS <i>(No objection subject to S106 contribution) – 05 May 2026</i> The comments received are primarily centred either a S106 contribution to off-site provision or the provision of an on-site facility.	These comments are subject to separate discussions being had on the Heads of Terms and S106 contributions.
Waste and Recycling Services Manager <i>(No objection) – 05 May 2026</i> There is no detail as to how the properties will be accessed, assuming this will come in the next stage of planning. Waste Services can therefore not provide a comment on the plans until	Details on access are subject to detailed design stage.

sufficient detail is provided as to the amount of properties, access and bin presentation points are provided.	
Lead Local Flood Authority (<i>No objection subject to conditions</i>) – 11 May 2026 The Flood Risk Assessment and drainage Strategy have been reviewed and are acceptable. Seven conditions have subsequently been requested.	No action and condition requests are accepted.
Urban Design Officer (<i>Further clarifications/ information requested</i>) – 04 June 2026) It has been noted that future Reserved Matters applications will be required to demonstrate full compliance with the North Hertfordshire Design Code. Access to play needs to be demonstrated through true isochrones and should be calculated along realistic and achievable pedestrian routes. The Access to Playspace drawing needs to be updated to clearly show the isochrones and residential development. Playspace figures also need to be reviewed. Green Infrastructure Plan to be updated to show the broad typologies of open space across the site. The key on the plan needs to explicitly identify each open space typology. Comments also note that there is a deficiency in LAP/ Tier 1 provision and notes that the minimum space requirements are as follows: Parks and Gardens: 1.23 ha Amenity Greenspace: 0.92 ha Natural/Semi-Natural Open Space: 27.7 ha Equipped Play: 0.38 ha Informal Play: 0.46 ha Allotments: 0.46 ha	Future Reserved Matters will be compliant with the Design Code condition that will be added to the outline permission. The Access to Play Framework Plan shows notes that, at the Reserved Matters stage, all homes will be within acceptable walking distance of a Tier 1 play space. Considering the outline nature of the scheme, the exact location and number of these cannot be fixed at this stage. This plan has been updated as requested with the level of accessible open space made clearer. The key reflects the accessible open spaces, removing ancient woodland from being accessible. The indicative open space breakdown has been provided below and is clearly policy compliant, exceeding several of the elements outlined within the Fields in Trust standards. It should be noted that the requirement for natural/ semi- natural open space figure is wrong and should be 2.77ha instead of 27.7ha. The site is providing: Parks and Gardens: 2.05ha Amenity Greenspace: 3.98ha Natural/Semi-Natural Open Space: 20.65ha (not including the ancient woodland) Equipped Play: 0.38 ha Informal Play: 0.46 ha (some of the informal space will be in other areas of the site)

	Allotments: 0.46 ha
Stevenage Borough Council (<i>No objection with suggested S106 contributions</i>) – 26 May 2026 Comments centre around contribution requests to local sports provisions.	No action. Heads of Terms and contributions are being discussed separately.
Transport Officer (<i>No objection with suggestions</i>) – 15 June 2026 The comments received were primarily to do with updating a number of plans to ensure consistency and further detail. It was noted that there were elements within the detailed design element that were to be updated to ensure compliance with the LTN 1/20.	Each of the requested plans to be updated are set out below with reasoning: Access Parameter Plan: - This has been updated to incorporate the connection to Grampion Place. Active travel Framework Plan: - This has been updated to show the land uses to make it clear where people are travelling from and to. Vehicular Movement Framework Plan: - This has also been updated to incorporate the land uses whilst also relabelling 'primary streets' to 'principal streets'. Public Rights of Way Framework Plan: - The plan has been updated making it clearer that footpath Weston 044 lies within the site boundary whilst also making the redline around Merrick Close clearer. - It was requested that details of the proposed paths to be upgraded to bridleways, including their widths and surface materials, be provided. However, as the majority of the proposals form part of an outline application, this level of detail is not yet available and would be developed and submitted as part of future Reserved Matters applications. - Concerns were raised that the plan was too definitive in showing where PRoWs would be diverted. In response, it has been revised to illustrate potential diversion routes rather than fixed alignments. - Recreational Routes Framework Plan: - This has been removed as agreed with the Council. Public Transport Framework Plan:

	- A label is being added to provide more flexibility to this plan in terms of bus catchments, due to the outline nature of the scheme. It is anticipated that the locations of the bus stops will form part of an appropriately worded condition Mendip Way Access Plan: - Cycleway radii amended to comply with LTN1/20 - Staggered barriers removed to comply to LTN 1/20 section 5.6.3 - Ramps not required, landscaping plan to be updated to suit - Keep-left sign removed - 'No right turn' sign added - Crossing details have been updated to include road markings and Belisha beacon posts. In addition, the crossing label has been amended to remove the word "informal", so it is now identified simply as a zebra crossing - Footway no longer widens to the north of Mendi Way as requested - Although the pedestrian/cycle arrangement was discussed at length prior to submission and changed numerous times, the drawing has been updated again to amend the arrangement to show a shared cycle/footway to the North - *Keep left bollards on the island have been removed as requested.
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c. Public Comments

In addition to statutory consultee responses, 99 public comments have been received and considered. The issues raised largely mirror those identified by consultees and, as outlined above, substantial work has been undertaken to address these matters and provide the necessary updates.

The principle of development has already been established through the site's allocation for housing. Furthermore, the proposals accord with the North-East of Great Ashby Masterplan, approved in November 2024, which can be accessed here: [North-East of Great Ashby masterplan | North Herts Council](#).

Appendix B: Ecology Matters Raised During Consultations & Mitigation Measures (prepared by CSA)

Ecology Matters Raised During Consultations & Further Mitigation Measures

North-East Of Great Ashby Stevenage Hertfordshire(GA2)

April 2026

1.0 Introduction

- 1.1 This note sets out matters arising from a virtual meeting held on 21 April 2026 in respect of the following planning application (ref: 25/03080/HYA) at the above Site between North Hertfordshire District Council (NHDC), the applicant, Picture Estates Limited, and their consultants:

"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."

- 1.2 The meeting was held to discuss ecology and biodiversity matters raised in recent consultations from Hertfordshire Wildlife Monitors, Herpetofauna Consultants International Limited (Tom Langton), the Badger Trust and Hertfordshire & Middlesex Wildlife Trust.
- 1.3 Each main matter raised in the meeting are set out in turn below along with commentary provided from the Applicant and their consultant team. The intention of this note is as a record of the meeting held and to allow for relevant responses to be provided from the Applicant.
- 1.4 A significant proportion of comments relate to badgers and effects upon local populations. For the avoidance of doubt, consideration of badgers in the context of planning applications relate principally to legislative protections which arise from both animal welfare and persecution of this species. Badgers are not of greater conservation concern than many other common mammals and in respect of assessing effects of development proportionately, should not attract significant weight in comparison to, for example, ancient woodland. Ecological assessment prepared of the proposed development were

therefore rightly focussed upon those interests at the Site deserving of significant ecological inputs, protections and enhancements.

2.0 Road Infrastructure & Habitat Connectivity

- 2.1 A key matter discussed related the road infrastructure design and 'bus loop' around Nine Acre Spring (woodland) in respect of habitat connectivity, as well as elsewhere within the Site.
- 2.2 As discussed during the meeting the principle of the proposed design has been subject to extensive discussion with relevant highways and design consultees and represents an agreed design position to serve the development proposed. These designs have included measures to minimise road widths in key locations to allow for maximum habitat connectivity for mobile species within the Site, such as bats and invertebrates. Furthermore, woodland habitats themselves are being extended through the provision of woodland buffer habitat of scrub/woodland planting, with a large SuDS feature/open space (1.3ha) provided contiguous with Nine Acre Spring.
- 2.3 As set out in more detail below, further provision of tunnel features has been proposed to minimise Road Traffic Accidents (RTAs) in respect of badger.
- 2.4 Overall, therefore, whilst the effect of the proposed development upon habitat connectivity within the Site is acknowledged as set out within the ES chapter, design of the scheme has sought to minimise effects as far as possible. Furthermore, wider landscape connectivity such as along the northern boundary between wider woodlands beyond the scheme, has been incorporated within the scheme design to further reinforce local ecological networks.

3.0 Effects Upon Badgers & Proposed Mitigation

- 3.1 A range of comments were raised in respect of the adequacy of badger mitigation and displacement effects upon badger populations. As set out within the Environmental Statement section 9.228 to 9.237 it is acknowledged in the absence of mitigation the construction and operation of the scheme could result in legal infringements on badger (although *not significant adverse effects* in respect of ecological value) as follows:
 - Loss of a single outlier sett (18)
 - Possible minor impacts to retained setts 1-4, 15-17 and 21 (i.e. disturbance during construction or damage to small area of setts).
 - Direct harm to badgers entering construction zones
 - Road Traffic Accidents (RTAs)
- 3.2 In addition to the above it was acknowledged in the ES chapter that occupation of housing, and the local population, could potentially

come into conflict with badgers, which could indirectly result in legal infringements. This is likely the case for almost any residential development in proximity to the open countryside.

3.3 In addition to the above, and as discussed during the virtual meeting it is accepted that the change in use of the site from intensive agriculture to residential uses will precipitate a change in badger behaviour. It is however reasonable to predict that badger populations persist at the Site, as they have adapted in many more urbanised areas across the country. An alternative possibility would be that one or more of the badger setts at the Site are vacated during or after construction. Whilst regrettable, in the context of their conservation status legal considerations such impact does not weigh significantly in ecological terms when compared to loss of ancient woodland. It is important to reiterate here that significant ancient woodland loss was originally approved as part of Site allocation, for which ecological advice has resulted in critical safeguarding of this habitat.

3.4 The Applicant has committed to a range of mitigation measures are proposed to be secured, as agreed and included within the ES chapter secured through relevant planning conditions, namely:

- Derogation (mitigation) licence [redacted] Natural England prior to commencement of any relevant works
- Where necessary, a licence for works within proximity of retained setts 1-4, 15-17 and 21. For the avoidance of doubt, these setts will not be closed based upon the outline designs, and the need for any such licensing require detailed infrastructure designs which cannot be reasonably prepared at this stage.
- Establishing the safest possible designs of roads at the following identified crossing points within the Site (with further details below following direct discussions with local badger group:
 - Site entrance between woodlands W4 (New Spring), W6 and W8 (Brooches Wood); Hedgerow H12
 - Hedgerow H10 and land between W9 (Nine Acre Wood) and woodlands W7 (Brooches Wood) and W10
 - Between W8 (Longdell) and W9 (Nine Acre wood)
 - Between W4 (New Spring) and woodland W3
 - Between woodland W5 and hedgerow H7, and along H7
- Best practice safeguards during construction would also be applied:
 - Pre-construction badger survey and monitoring
 - Covering any open excavations with wooden boards, or fitting them with appropriate escape ramps, in order to prevent badgers falling into them

- Monitoring of site for any new sett excavation during prolonged remediation, construction or landscaping works.
- Night time working within 50m of retained setts will not be undertaken unless in exceptional circumstances to prevent noise disturbance and night time illumination near to setts.

3.5 Further consideration of public conflict with badgers are set out below.

4.0 Mammal Tunnels & Fencing

- 4.1 As discussed during the virtual meeting, and as set out above, concern has been raised with regard to the details of designing the safest possible road-crossings, particularly in respect of mammal tunnels and fencing. Further information has been set out below, which would be formally submitted and prepared to discharge relevant planning conditions.
- 4.2 Images below illustrate the principles of design features and potential options selected on a case-by-case basis across the Site, including tunnel material/shape, safety features, fencing/wall options, and screening planting. The images should not be taken as complete designs and commentary has been set out with each image accordingly.
- 4.3 Appropriate sizing, construction and deployment will be required, including careful safety considerations in close consultation with highway engineers and other design professionals. Maintenance of any such features would be proposed in consultation with appropriate professionals.
- 4.4 In respect of public interaction with tunnel features, detailed design will ensure, through dense thorny shrub planting and fencing, that no clear public access is made available to tunnel entrances. Early establishment of such planting and fencing will be undertaken, and where appropriate or required baiting of tunnel entrances and tunnels will be undertaken to attract badgers into and through these structures.



Photograph 1.

Sandbag wall/entrance option with concrete tunnel



Photograph 2

Potential pipe option, with fencing. Would require additional planting/cover and guide walls.

5.0 Badger Settl Closures & Natural England

5.1 Particular concern has been raised as to the closure of setts, at the Site with suggestion of main sett closure and the absence of artificial sett provision. As set out above, and for the complete avoidance of any doubt:

- [REDACTED] under a derogation (mitigation) licence obtained from Natural England prior to commencement of relevant works
- [REDACTED]
- Only where absolutely necessary, and subject to final detailed designs there is a small chance of works being undertaken close to [REDACTED]. This may require a licence from Natural England to be undertaken lawfully. However, these setts will not be closed and therefore no artificial sett construction is required.

5.2 It is understood that the Construction Environmental Management Plan (CEMP) submitted with the application refers to wider closures/temporary closures of badger setts. The CEMP will be updated accordingly to confirm the above situation of only a single sett closure confirmed, all remaining setts retained and subject to licensing works only where absolutely necessary.

5.3 It is acknowledged that during the construction period, and subject to any changes in badger activity, there remains the potential for new setts to be dug at any time. Therefore, any badger mitigation approach will

need to adapt, based upon update survey work, as required during construction.

- 5.4 Questions were also raised regarding whether Natural England would licence sett closure works and whether any consultation has been conducted. Natural England do not refuse the licensing of sett closures in the context development except where works proposed are themselves inappropriate, cause animal welfare or other legal concerns. Natural England have not been consulted in this context and typically would not consider the closure of a single outlier sett, or the small-scale disturbance of other setts, to be of significant concern for licensing.
- 5.5 Any licensing will be conducted in accordance with Natural England's current guidance and approach set out in standing advice: <https://www.gov.uk/guidance/badgers-protection-surveys-and-licences>

6.0 Baiting Marking & Analysis of Badger Territories

- 6.1 It was raised by several consultees that badger bait marking should have been conducted to provide detailed analysis of badger territories.
- 6.2 To provide absolute clarity, there are two principal justifications reasons to conduct badger bait marking exercises in respect of development, which are as follows:
- Where linear infrastructure development is proposed (e.g. major roads) that will permanently separate or split a badger territory, in order to provide appropriate mitigation for badger, clans effected, principally in relation to animal welfare, OR;
 - Where a main sett will be closed and an artificial sett required, and the location of that sett needs to be located within the same territory area, and this cannot be established through other survey means.
- 6.3 Given the above, that the scheme does not comprise major linear infrastructure permanently separating badger territories, or where an artificial sett location needs to be determined, there is no reasonable justification for conducting a bait marking exercise at the Site.
- 6.4 It should be noted in government guidance regarding badgers, badger baiting marking is not specifically highlighted as required for the purposes of this form of development <https://www.gov.uk/guidance/badgers-advice-for-making-planning-decisions>

7.0 Provision of Orchard

- 7.1 Concern was raised on the location of an orchard in an inappropriate location for known badger activity to the northwest of the Site as shown on relevant illustrative designs.
- 7.2 For the avoidance of doubt, the orchard to the northwest of the Site was located here for its wider biodiversity benefit and for public benefit as a community orchard, rather than for badgers.
- 7.3 [REDACTED]

8.0 Badger Conflict

- 8.1 As acknowledged within the ES chapter, there is potential for future conflicts to arise between new residents and badgers, for example where badgers' access residential gardens for foraging. It is not possible to predict where badgers will forage following development of the Site, however the following important considerations should be given:
- Badgers forage preferentially in grassland for earthworms as well as in woodland and scrub/hedgerow habitats in comparison to arable habitats, which currently dominate this site. The proposed development provides a very significant increase in all of these habitats within open spaces away from private gardens comprising:
 - **Grassland** increasing from 3.85ha to 19.03ha, a **15.18ha increase** or 394%
 - **Woodland** increasing from 10.73ha to 11.36ha, a **0.63ha increase** or 6%
 - **Scrub** increasing from 0.39ha to 6.02ha, a **5.63ha increase** or 1444%
 - **Hedgerow** increasing from 2.67km to 4.31km, a **1.64km increase** or 61%
 - The above 'grassland' category includes 0.28ha of orchard (included in UKHab classification within grassland grouping) with one such orchard close to known badger sets.
 - Badgers are known to be susceptible to drought at the Site, and local badger groups provide supplementary water for the current population in the summer months. The proposed scheme includes the provision of wildlife ponds (0.16ha) and Sustainable Drainage Systems (SuDS) features (2.79ha) including to attenuate water.
- 8.2 Based on the above it is clear that the proposed scheme, including significant areas of open space with far improved foraging and watering features, will provide substantial opportunities for badgers and will likely compensate for the loss of extensive but poor forage within current arable habitats.

- 8.3 Overall, therefore, a significant effort is made to encourage badgers away from private residential gardens where conflict would otherwise arise. Should the authority disagree with this position, additional options may be considered including subterranean barriers installed on boundary fence lines of private gardens close to known badger setts. Nonetheless this matter would be dealt with at the detailed design stage through relevant condition and is not a matter for the outline application stage.

9.0 Residents Group

- 9.1 Consultees raised the imposition of a condition to secure the creation of a local resident's group in respect of wildlife and related matters. Whilst such groups where formed do benefit the delivery and ongoing protection of wildlife and habitats within development, it is understood that their creation, funding or role/responsibility cannot be formally agreed ahead of planning consent. As with all planning conditions, these must meet the tests of necessity, enforceability, precision, or reasonableness as set out in national policy, and it is considered unlikely that such a condition would meet all these criteria.

10.0 Additional Matters

- 10.1 Further matters raised during consultation have been set out below.

Full Element – Access Rd

- 10.2 The choice of species of tree proposed within the road corridor were raised. It is confirmed that these were selected in accordance with constraints of overhead powerlines.
- 10.3 Further details of lighting for the access road are provided within the forthcoming resubmission pack and have been subject to ecological review.

[REDACTED]

- 10.4 [REDACTED]

[REDACTED]

Bats

- 10.5 Request for updated bat surveys were made during latter stages of the consultation process. The Applicant's view was it is not reasonable to undertake further bat surveys for the following reasons:
- **'In date' bat survey information was provided to NHDC ecologist and Place Services at the start of a protracted pre-application process between 2024 and 2025**, allowing full consideration of survey data and potential impacts of the scheme at the time. Bat survey data was collected in the 2023 season, supplemented by walkover surveys in 2024 and 2025 to confirm conditions remained as previously recorded.

- At the time of submission (January 2026) after the delay effectively caused by the pre-app timescale, the bat survey data, supplemented by walkover surveys in intervening years still provided a fair basis upon which to determine ecological impacts specifically:
 - Which bat species make use of the Site (at least 8)
 - The spatial distribution of bat activity (activity focussed along woodland edges and hedgerows as would be reasonably expected)
 - The relative activity levels of bat activity (predominantly common pipistrelle activity)
 - The importance of bat assemblage (County importance)
- Update bat survey data from 2026 is highly unlikely to alter any of the above parameters, and the resultant impact assessment and mitigation, specifically:
 - Lighting design will still be considering all of the hedgerows, woodland edges and tree lines as the key flight lines, with arable habitat being of lower interest
 - 'Hop-over' features are integrated into the scheme
 - Extensive habitat creation, including woodland buffers, grassland, ponds, orchards drainage features and hedgerows will benefit the bat population at the Site

10.6 Finally, there is no legal reason to update bat activity surveys and any removal of trees within the site which could conceivably support roosting bats would be subject to relevant surveys to ensure lawful felling.

10.7 In summary, the following position is set out with regard to a request for update bat surveys:

(A) it is not reasonable to update bat survey data when it is the authority who have effectively determined the length of pre-application and determination period;

(B) updated bat surveys in 2026 are highly unlikely to effect previous conclusions made

(C) updated data is highly unlikely to meaningfully change mitigations proposed

Overhead Lines & BNG

10.8 Concerns were raised with regard to securing habitats for the purposes of Biodiversity Net Gain (BNG) within the Site under overhead pylons and whether these should be included in any biodiversity metric calculation. It is understood that the freehold of the land sits entirely with the Applicant's control and the easement deed relating to the overhead lines grants the electricity company the right to undertake cutting, felling, and coppicing of trees and vegetation that interfere with the statutory safety distance requirements from the lines, subject to three days' notice being given to the landowner.

- 10.9 The maintenance of open spaces and landscaping areas, and their contribution towards BNG requirements, will be specifically controlled under the Landscape Management Plan and other applicable documents to be approved by the authority at the relevant stage. These obligations will transfer to the management company responsible for maintaining these areas on behalf of the future residents.
- 10.10 The guidelines set out within the aforementioned and approved plans will include specific provisions to ensure that trees and shrubs are maintained at an appropriate minimum distance from the overhead lines. Given that these obligations will form part of the developer's responsibilities, and subsequently those of the management company.
- 10.11 In addition, the precise positioning of the new planting will be carefully determined during the next stages of the design process to ensure adequate access routes for maintenance vehicles and equipment, without adversely affecting the green spaces or habitats within those areas.
- 10.12 Consequently, there should not be a reason why areas within overhead cable easements should be deducted from those identified for BNG net gain.

Draft HMMP

- 10.13 Monitoring intervals were raised with regard to BNG delivered at the Site. The draft Habitat Management & Monitoring Plan (HMMP) has been updated to incorporate the suggested monitoring intervals from the Ecology Officer. It should be noted the document submitted is only a draft HMMP, and a final document will be completed within the detailed stages of the application including to support the discharge of the general Biodiversity Gain Condition.

Appendix C: Skylark Mitigation Location (edged in red)

