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

Contact: Helen Saunders
Email: ecology@hertfordshire.gov.uk
Date: 27/02/2025

Dear Henry,

APPLICATION: [25/00198/DOC](#)

PROPOSAL: Details reserved by Condition 6 (Ecology and biodiversity) of planning permission 23/01885/FP granted on 13.12.2024.

ADDRESS: Land At Police Row Between The Grange And 1 The Grange, Police Row, Therfield, Hertfordshire,

ECOLOGICAL IMPLICATIONS

Overall Recommendation:

- ☒ **Insufficient information has been submitted for condition 6 to be discharged**

Supporting documents:

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

- Construction Environmental Management Plan (CEMP) (Wheatley, November 2024)

Condition 6

No development shall take place (including ground works or vegetation clearance), excluding any works required in association with ground investigation works, until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The CEMP shall include the following:

- a) Risk assessment of potentially damaging construction activities.*
- b) Identification of "biodiversity protection zones".*
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*
- d) The location and timing of sensitive works to harm to biodiversity features.*
- e) The times during construction when specialist ecologists need to be present on site to oversee works.*
- f) Responsible persons and lines of communication.*

g) *The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*

h) *Use of protective fences, exclusion barriers and warning signs.*

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority

Reason: in the interests of ecology and biodiversity and in line with Policy NE4 of the Local Plan.

Comments:

A Construction Environmental Management Plan (CEMP) has been provided which includes a section on ecology, however, this does not incorporate most of the details or measures required to discharge condition 6.

a) *Risk assessment of potentially damaging construction activities.*

This has not been included. The CEMP states that "No known protected species, sites or invasive or injurious species have been identified as being affected by the works." However, the Preliminary Ecological Appraisal identified a potential low risk of harm to hedgehogs, badgers, reptiles, amphibians, bats and nesting birds.

The report also identified a risk to Great Crested Newts. It is understood that a signed Impact Assessment and Conservation Payment Certificate (IACPC) has been received confirming the intention to join the District Level Licence scheme. No works, including clearance, should begin until the licence has been received which should be included in the CEMP.

b) *Identification of "biodiversity protection zones".*

Whilst tree protection measures are detailed in a separate document identification of areas of particular concern for biodiversity (including areas to be retained, bird nesting areas, trees with potential for roosting bats, etc) has not been included in the CEMP.

c) *Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*

These have not been included. Recommendations to avoid or reduce impacts on biodiversity detailed in the Preliminary Ecological Appraisal have not been included.

d) *The location and timing of sensitive works to harm to biodiversity features.*

Timings of works in relation to season (nesting birds) or time of day (e.g. construction lighting) have not been included

e) *The times during construction when specialist ecologists need to be present on site to oversee works.*

Recommendations detailed in the Preliminary Ecological Appraisal have not been included.

f) *The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*

Not included

Until the above issues have been addressed, I cannot advise that condition 6 can be discharged

Thank you for consulting this office on the above application.

I trust these comments are of assistance,

Regards,

Helen Saunders MCIEEM
Ecology Advisor, Hertfordshire LEADS

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