

Officer Liz Anderson – Ecologist
Date 21/11/25

Ref: 25/00886/FP
Att: Tom Rea

Reed House, Jacksons Lane, Reed, Royston, Hertfordshire, SG8 8AB

Erection of 14 dwellings and associated infrastructure

Consultee comments;

Thank you for consulting me, whilst there is no objection to the principle of development on the site the scale proposed in this application fails to meet North Herts Local Plan policy requirements. Having read through the submitted documents I am concerned at the extent of tree loss from the site. It is disappointing to see the proposal will require the removal 11 trees to facilitate the development, thereby losing 20% of the B grade trees.

The October 2024 Statutory Biodiversity Metric records the site as having a baseline value 5.96 Habitat Units and 1.36 Hedgerow Units. The post-development habitats of the site are valued at 4.39 Habitat Units and 1.65 Hedgerow Units. Whilst there is a gain in hedgerow units it still represents a 26.4% loss of habitat units and as such the applicant would need to source these off-site.

North Herts Local Plan policy NE4 requires 12 metres of complimentary habitat be provided around trees and hedgerows and this site clearly fails to achieve that. Whilst there is a degree of flexibility on assessing the application of the policy, a proposal such as this on a site with extensive tree cover, on the rural edge would seem cramped.

The garden of plot 8 is south facing but the heavy tree cover would result in new householders inevitably wishing to remove the trees to create more garden space and less shading. The layout includes a central SUDS feature surrounded by a road which is a missed opportunity to actually seek further ecological benefit by connecting it with the adjacent habitat.

Whilst no protected species were identified on site the April 2024 Preliminary Ecological Appraisal (PEA) notes a high likelihood of the site supporting foraging and commuting of bats. As such the introduction of lighting mitigation measures are proposed including ensuring security lighting is kept to a minimum and activated by motion sensors and serviced and maintained in good working order and avoiding illumination of retained boundary features. However, once homes are built such lighting controls will not be possible to enforce.

The PEA makes recommendation for ecological enhancements on plot including bat and bird boxes, it is recommended that these are integrated features in the built fabric of dwellings. Taking this into account the following condition is advised;

Ecological Enhancements

No development shall take place until an Ecological Enhancement Plan (EEP) for the creation of new wildlife features such as the inclusion of integrated bird/bat and bee boxes in buildings/structures, hedgehog holes in fences and hibernacula as informed by the April 2024

Preliminary Ecological Appraisal has been submitted to and approved in writing by the local planning authority.

Reason: To ensure development is ecologically sensitive and secures biodiversity enhancements in accordance with the North Herts Local Plan policy NE4.

Some habitat creation will be undertaken on site in public areas, including the SUDS and communal areas. In order for these to meet the requirements of Biodiversity Net Gain this habitat should be maintained and managed appropriately. Habitat creation and enhancement which includes habitats of medium distinctiveness and above is classed as significant and will need to be secured for 30 years. In this case the use of a Landscape Ecological Management Plan (LEMP) is advised.

Landscape Ecological Management Plan

The development shall not commence until a Landscape Ecological Management Plan (LEMP), prepared in accordance with the approved Biodiversity Gain Plan has been submitted to, and approved in writing by, the local planning authority and including.

- (a) a non-technical summary;*
- (b) the roles and responsibilities of the people or organisation(s) delivering the LEMP;*
- (c) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;*
- (d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development;*

Reason: To ensure development delivers a biodiversity net gain in accordance with Schedule 7A of the Town and Country Planning Act 1990 and the NPPF

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.