

# **COYNE ENVIRONMENTAL LTD**

**Old Foxes  
North End  
Kelshall  
SG8 9SE**



## **ECOLOGICAL REVIEW**

**May 2025**

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Company No 15416453**

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## **INTRODUCTION**

Coyne Environmental Ltd. has been instructed to carry out an ecological study of Old Foxes, North End, Kelshall, Royston, SG8 9SE, for a planning application to develop part of the site. A Preliminary Ecological Appraisal (PEA) has found no ecology of significance on site. From this a Biodiversity Net Gain (BNG) in accordance with the Environment Act 2021, has been undertaken which did not achieve the required minimum 10% net gain. This therefore cannot be submitted to the North Hertfordshire District Council (NHDC), for determination until other options are considered



The completed PEA and BNG will enable the local planning authority (LPA) to consider the impact of the proposal on wildlife. The authority can then discharge its legal obligations under the 'Conservation of Habitats and Species Regulations' (2018) and any 'Outline Mitigation and Compensation Strategy' if required.

I am a qualified Ecologist, with over 40 years' experience in the environmental field. This includes being a license bat worker (Bat License 2015-15943-CLS-CLS). The PEA Survey was carried out on the 21<sup>st</sup> of November 2024.

## **SITE**

The site is situated along North End Road, Kelshall and part of a rural hamlet of farm buildings with Fox Hall prominent. It is proposed to construct a new building to the west of the site (Area A), with the east being left as short, frequently mown amenity grass (Area B). The proposed area where the construction will take place is a square plot, with newly built, close boarded wooden fence surrounding the perimeter. Within the site is short rough meadow grass, with trees present along the west and south boundaries. To the north is a rectangular horse paddock, a gravel driveway, and the main house. There are two native hedgerows, one along the east boundary of area B, and one along the east boundary of area A.

## ECOLOGICAL SURVEY

The main habitats recorded on Area A was modified grassland (UKHab code: g4) of short, frequently mown, amenity grass. Species include meadow grass, dock, creeping cinquefoil, common daisy and clover. Surrounding this area is a newly built close boarded fence. Area B is similar with fewer, similar species seen such as clover, meadow grass and common daisy. Along the east boundary of area B is a small area of bare ground. This is situated between the amenity grass within the site and the native hedgerow (thorn, field maple, hazel) along the east boundary. Just outside the fence to the south and west are a few trees (willow) which overhang the fence. Access to area is from a gravel driveway to the north



*Figure 1. Three photos showing the site, area A, on the left and centre, and area B on the right. Taken by Luke Davenport on the 21st of November 2024.*

As there are no buildings on the proposed development site, bats (European Protected Species) were not encountered. In fact, the short, grazed turf, showed no signs of wildlife actively and the area was assessed to have minimal ecological value.

## BIODIVERSITY NET GAIN (BNG)

The Environment Act 2021 has a mandatory require for Biodiversity Net Gain (BNG) on most new development, of a minimum of 10%. A BNG metric was undertaken, and produced a deficit which cannot be submitted to the Local Planning Authority (LPA) until alternatives are found to compensate for the biodiversity loss due to the loss of grassland with the new building and hard surfacing.

Reviewing the proposals by enhancing the remaining **1278m<sup>2</sup>** grassland reduces the deficit but still does not achieve the mandatory 10% net gain. There are two alternative recommended solutions as follows:

- 1 Compensation on other land in the applicant ownership and in the same LPA area
- 2 Purchase Statutory Biodiversity Credits (SBC)

## **OPTION 1 Compensation on Applicant's Land**

The client owns all the immediate land around the Application site and indicated that Area B can be considered for the BNG deficit. This could be achieved by improving **100m<sup>2</sup>** of the existing grassland from Moderate to Higher Condition. It is assumed all existing trees and hedgerows will be retained in the proposal. If any need to be removed, the deficit will increase, and further measures will be needed to compensate for their loss.

Using this land to meet the BNG deficit will require the site to be managed and maintained for a 30 -year mandatory period in a legal agreement (S106) with compulsory monitoring by the LPA over that time. A Habitat Management & Monitoring Plan (HMMP) and Biodiversity Gain Plan (BGP) will be a Condition of the Approval, and the LPA may have additional BNG requirements

## **OPTION 2 Purchasing Statutory Biodiversity Credits (SBC)**

Biodiversity credits can be purchase from the government credit service and to achieve the 10% net gain, it is estimated would cost **£47,000**. However, there are private habitat banks which will have more competitive rates. It should also be remembered that these SBC's only need to be obtained after planning permission is achieved. Also, when purchased, this wavers the requirement for the 30-year commitment in the Environment Act 2021 with ongoing management maintenance and monitoring costs by the LPA.

## **CONCLUSION**

Coyne Environmental Ltd. has been instructed to carry out an ecological study of Old Foxes, North End, Kelshall, Royston, SG8 9SE, and a PEA survey has been carried out and found no ecology of significance on site, including bats (EPS). A Biodiversity Net Gain (BNG) metric did not achieve the mandatory minimum 10% net gain on site, as required in the Environment Act 2021. Offsite solutions have therefore been investigated with two alternatives provided.

With Option 1 as the applicant as additional land adjacent the proposal site, this could be used to compensate for the biodiversity loss. This will have to be managed maintained, and monitored for the mandatory 30 -year period, under legal agreement. This will also be additional cost to the project

With Option 2 the purchasing of SBC is an initial, one off, additional cost. This does not have to be met until the Application has been approved (Condition). The additional costs of the ongoing 30-year requirement in the Environment Act 2012 are waved and the land can be sold with no restrictions.

It is therefore up to the applicant to consider which Option is preferred and when decided this needs to be issued to the LPA for consideration. I conclude that no further ecological or environmental studies are necessary to satisfy the requirement for

ecological and biodiversity enhancements. On this basis the proposal can be determined by North Hertfordshire District Council (NHDC).

## **REFERENCES**

Option Map

Mitigation Plan

Habitat Map

Proposal Plan

Coyne Environmental Ltd PEA Report

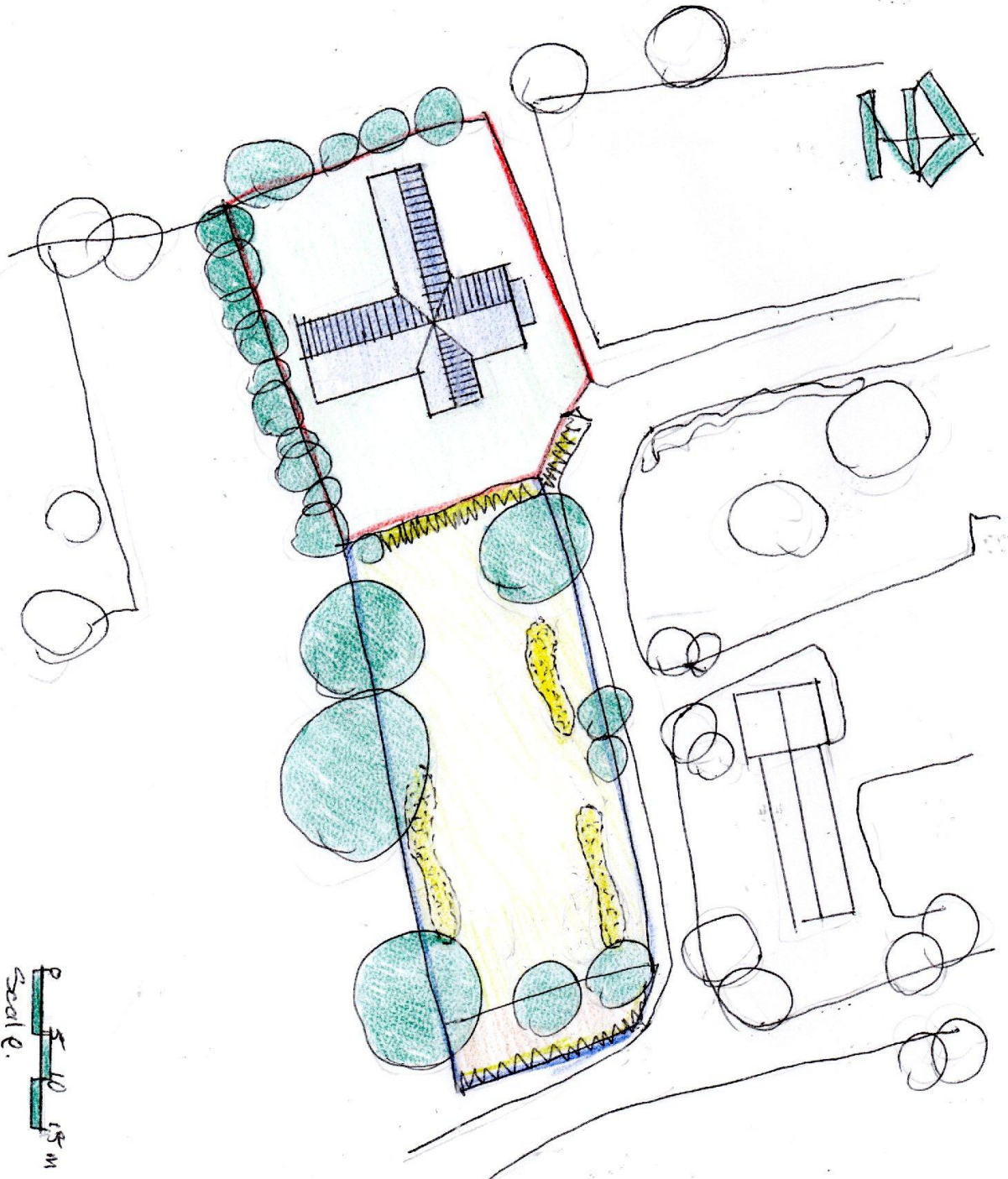
Coyne Environmental Ltd BNG Report

Environment Act 2021

Wildlife & Countryside Act (1981)



DO NOT SCALE



0 5 10 15 m  
Scale.

NOTES:

Plan to be used in conjunction with the client's drawings and other relevant landscape drawings.  
No measurements are to be taken of these drawings.  
Work from ground dimensions only.  
All measurements and levels are to be checked out on the landscape on-site to be noted immediately or any discrepancies prior to the commencement of work.

KEY

- red line red line boundary
- blue line blue line boundary
- (B) Existing trees
- Existing hedge
- Proposed new building
- hedge
- Proposed wild plum
- Wild plum

COYNE ENVIRONMENTAL

by Ted Coyne  
Dad Coyne  
Kelsall  
Mortimer Plan

COYNE ENVIRONMENTAL  
5 PINEWOODS GATE  
ASHWELL SG7 8D  
01462743723

8/8/11 21.525



**Key:**

- Old Foxes, Kelshall
- Site Boundary
- Proposal Boundary
- Amenity Grass - g4
- Native Hedgerow - h2a
- Tree
- Manure and debris
- Bare Ground - 510
- Driveway - u1c
- Sparsely vegetated - u1f
- Wooden Fence - u1e

0 5 10 15 m

N

**Coyne ENVIRONMENTAL**

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5 Philosophers Gate  
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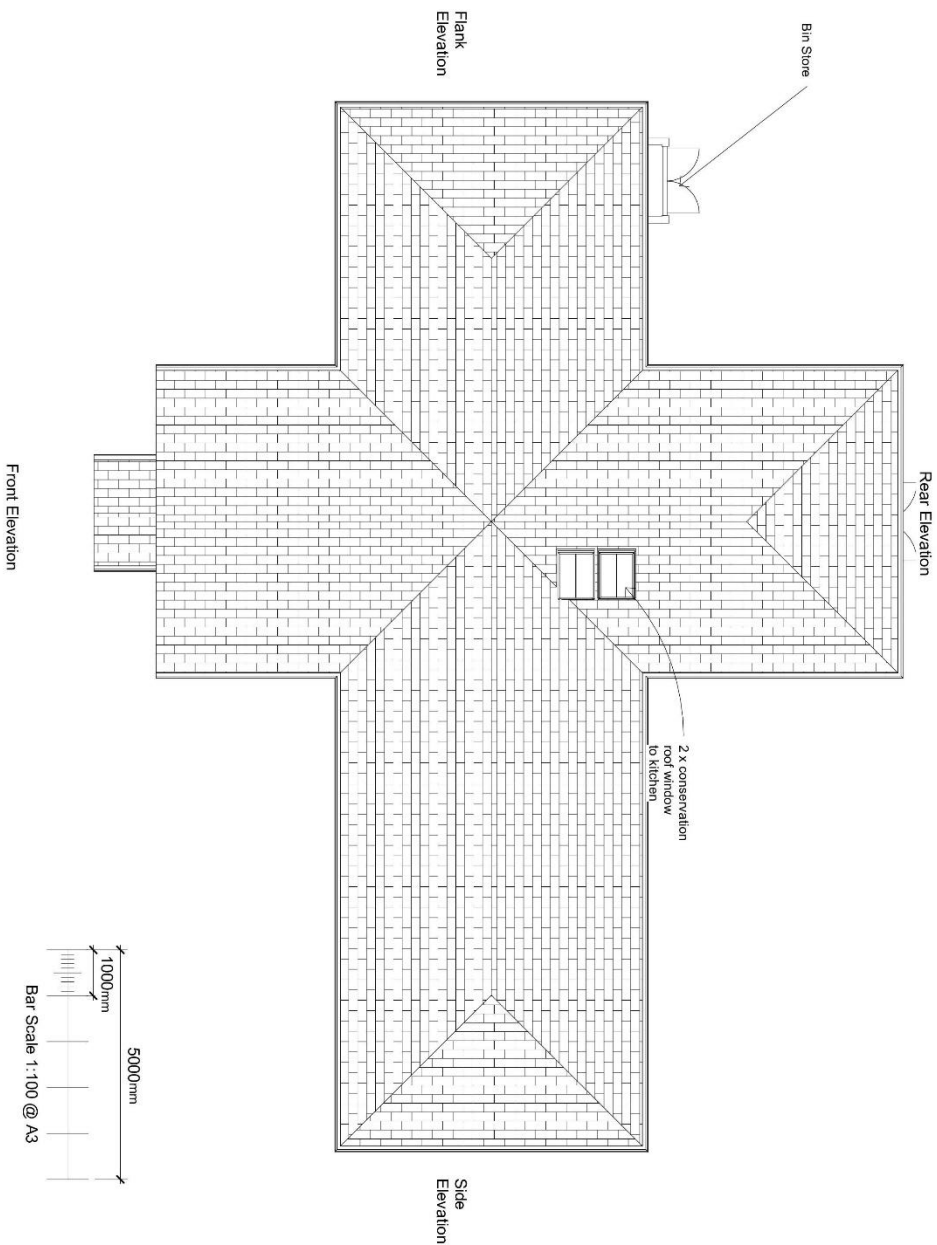
**Old Foxes, Kelshall, Royston**

Habitat Plan

24216

21/11/2024

|          |            |
|----------|------------|
| TITLE    | SURVEY     |
| PROJECT  | 24216      |
| DATE     | 21/11/2024 |
| REVISION |            |



Address:  
Old Foxes  
North End  
Keishall  
Herts SG8 9SE  
Drawing Ref:  
A 03  
Scale:  
1:100 @ A3  
Drawing Title:  
Proposed Annex  
Roof Plan  
Date:  
25 September 2024