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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.

Thank you for consulting the Herts & Middlesex Wildlife Trust (HMWT) on this planning application. HMWT notes that the site is allocated in the North Herts Local Plan, and a strategic masterplan for the site has been agreed by North Herts Council.

HMWT has **no objection** to the planning application, but would like to make the following comments.

Ancient woodland

HMWT supports the comments of Natural England, in particular the recommendation that the applicant produce an ancient woodland recreational management plan and use a minimum 15 m buffer around ancient woodland and woodland habitats, with an associated root protection zone in design plans.

Biodiversity net gain

We support the applicant's ambitious approach to biodiversity net gain (BNG). The BNG headline results show an on-site net change of 25.93% (habitat units) and 39.19% (hedgerow units), and this is welcome. This ambition should be maintained throughout subsequent phases of development.



Creating a wilder Hertfordshire and Middlesex

Biodiversity enhancements

We welcome the ecological enhancements proposed at para. 9.289 (Ecology and Biodiversity Chapter, Environmental Statement) 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).

Swifts are summer migrants to the UK and a familiar species in urban areas, but their numbers declined by 62% between 1995 and 2021 and they are now on the Red List of Birds of Conservation Concern. The loss of suitable nesting sites when buildings are renovated or demolished is likely to be a key factor in their decline, so providing integral swift bricks (which are more durable and less obtrusive than external boxes) in new buildings is an easy and cheap solution. Even when they are not used by Swifts, they benefit other red listed urban species such as House Sparrows, Starlings and House Martins. For housing developments this should be at a ratio of one brick per dwelling, as recommended by National Planning Practice Guidance.

All species of bats are legally protected and, like Swifts, have suffered population decline which may be due in part to the loss of roosting sites in modern buildings. Integral bat bricks are part of the solution for new developments.

“187. Planning policies and decisions should contribute to and enhance the natural and local environment by ...

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs ...”

NPPF paragraph 187

National Planning Practice Guidance:

How can developments incorporate features which support priority or threatened species?

The National Planning Policy Framework expects development proposals to bolster wildlife by incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.

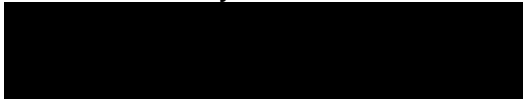
The use of swift bricks is particularly important in this context because swifts rely on urban cavities for nesting, and the national loss of suitable nesting sites through building renovation has been part of the reason for the species' decline. Developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows.

Extensive guidance is available on wildlife friendly features, including the National Design Guide and National Model Design Code which illustrate how well-designed places can support rich and varied biodiversity by facilitating habitats and routes for wildlife. More specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 42021:2022 the Future Homes Hub Homes for Nature Guidance, and the RSPB's Guide to Nestboxes.

Finally, all ecological mitigation, compensation and enhancement measures should be secured through suitable planning conditions and/or a legal agreement.

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

Yours sincerely



Simon Marsh MBE BA MA MSc MRTPI
Planning and Policy Manager