

Officer Liz Anderson – Ecologist

Date 14/09/2026

Ref: 26/00705/FP

Att: Anne McDonald

Connor Gardens, Danesbury Park Road, Welwyn, Hertfordshire, AL6 9SN

Change of use of land to residential static caravans/park homes to include footpath extension, parking, improved access points and associated landscaping (including changing the levels of part of the quarry area) and infrastructure

Consultee comments;

Thank you for consulting me, having looked at the submitted documents and updated Biodiversity Metric I would have no ecological objection to the proposal. The submission of the March 2026 Preliminary Ecological Appraisal (PEA) is welcomed. The site is identified as sparsely vegetated land containing limited amounts of recolonising vegetation, with a small parcel of modified grassland to the south and hardstanding to the north.

The PEA advises habitats on site have the potential to support protected and/or notable species. As such, the report outlines important measures to protect species during site clearance, and recommendations to improve the biodiversity status of the site post development. A sensitive development approach in relation to species on site will be required and the following condition is advised;

No development shall take place (including vegetation/site clearance) until a Precautionary Working Method Statement (PWMS) for reptiles, amphibians, hedgehogs, badgers and nesting birds has been submitted to and approved in writing by the Local Planning Authority. The approved PWMS shall be implemented in full according to the specified timescales, unless otherwise agreed in writing by the local planning authority.

The submitted Statutory Metric identifies the site biodiversity baseline as 10.27 Habitat Units with the post-development habitats of the site valued at 1.59 Habitat Units, a loss of 84.48%, much of this loss has already occurred due to previous site clearance. As this was undertaken post 2020, Metric guidance is clear that *if a habitat has been cleared, destroyed or degraded previously you must use the pre-degradation habitat type as the site's baseline* which the applicant has done. As the development is unable to meet the mandatory requirement for 10% BNG on site off site credits will be required.

The September 2026 Biodiversity Net Gain Report advises the client will seek to offset the unit shortfall through purchase of offsite credits from a third -party provider. Whilst there is no ecological objection to the principle of development at this site, information would need to be clarified to satisfy a Biodiversity Gain Plan.

The PEA makes recommendations for biodiversity enhancements and, in conjunction with North Herts Local Plan policy NE4, the following condition is advised;

North Herts Council,

PO Box 10613, Nottingham, NG6 6DW

www.north-herts.gov.uk

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 March 2026 Preliminary Ecological Appraisal has been submitted to and approved in writing by the local planning authority.

The PEA also advises the use of a Construction Environment Management Plan to safeguard the adjacent woodland priority habitat. The following wording is suggested;

No development shall take place (including ground works or vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) should be informed by the March 2026 Preliminary Ecological Appraisal and include the following.

- a) Risk assessment of potentially damaging construction activities.*
- b) Identification of "biodiversity protection zones".*
- c) Practical measures to avoid or reduce impacts during construction.*
- d) The location and timing of sensitive works to harm to biodiversity features.*
- e) 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.

Given the adjacent woodland habitat and the potential for bat interest associated with this I recommend the use of a lighting strategy to ensure impacts from lighting introduced to the site does not affect the adjacent woodland habitat.

A lighting design strategy for biodiversity for the site shall be submitted to and approved in writing by the local planning authority. The strategy shall;

- a) identify those areas/features to which bats and other nocturnal species are particularly sensitive and that are likely to cause disturbance in or around their breeding sites and resting places, or along important routes used to reach key areas of their territory, for example, for foraging,*
- and b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.*

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the Local Planning Authority.

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.

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.