## HERTFORDSHIRE ECOLOGY

Providing ecological advice to Hertfordshire's Local Authorities and Communities

Environmental Resource Planning
Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DN

<u>ecology@hertfordshire.gov.uk</u>

Tel: 01992 555220

Mr David Elmore Senior Development Management Officer Welwyn Hatfield Borough Council

Tel: 01992 556149

Anita Parry

Date: 22/10/2019

Ask for:

Dear David,

**Application Reference:** 6/2019/2155/COND

**Proposed development at:** 101 Brookmans Avenue, Brookmans Park, Hatfield, AL9 7QG **Proposal**: Submission of details pursuant to condition 1 (Materials), 2 (Crown Roof) and

3 (Biodiversity and Lighting) on planning permission 6/2019/0434/FULL

Thank you for consulting Hertfordshire Ecology on the above. I apologise for the delay with this reply.

I have the following comments to make on 3 (Biodiversity and Lighting), which states:

No development above ground level in any phase of the development shall take place until details of features to enhance on-site biodiversity and details of an external lighting scheme designed to minimise the impact of lighting on bats have been submitted to and approved in writing by the Local Planning Authority. The development must then be carried out in accordance with the approved details and retained permanently thereafter.

REASON: To enhance and secure measurable net gains for biodiversity in accordance with Policy R11 of the Welwyn Hatfield District Plan 2005; Policy SADM16 of the Welwyn Hatfield Borough Council Draft Local Plan Proposed Submission August 2016; and the National Planning Policy Framework 2019.

I have seen the Landscape Masterplan (Guarda Landscape, 15/02/2019 amended 25/02/2019) and Ecological Enhancements Plan (Guarda Landscape / Hybrid Ecology Ltd, 02/08/2019 revised 27/08/2019) submitted in support of this application.

The existing native beech hedges will be retained and extended; and other native trees are proposed for inclusion within the front and rear garden planting schemes. Plenty of wildlife habitat boxes/features are shown on the Enhancement Plan including boxes for bats, swifts, and sparrows; and holes in fences for hedgehogs (Hedgehog Highways). I consider these measures are appropriate and satisfy part of Condition 3.

**However, I have some concerns about the proposed lighting**. The Ecological Enhancement Plan shows 52 lights, which seems excessive for the application site (which

comprises a residential plot – albeit large - with a large house, a coach house, outbuilding / shed; and associated hardstanding drive, garden lawn, bordering trees, beech hedgerow and ornamental planting). The site is on the edge of Brookmans Park residential area and backs onto an extensive golf course with mixed habitats. There is a grass sports pitch 25m to the north-east and a broadleaved woodland Local Wildlife Site 115m to the east. All these undeveloped areas will be unlit, or have generally little lighting.

The plan also indicates that the purpose of the lights is specifically to illuminate vegetation. I am unclear whether the lighting 'scheme' has been drawn up considering ecologists recommendations, or approved by an ecologist as being acceptable. This needs clarification.

LED bulbs are proposed, which are considered to be bat-friendly especially if UV free. However, further details on the nature of the lighting; the extent to which the lights will illuminate hedges, bushes, flowerbeds, and trees; and an indication of the impact on this vegetation (i.e. why these lights will not have negative impact on the habitats, invertebrates and their prey, e.g. bats), is required

Herts Ecology will be happy to review this information once received by the LPA; however until the requested information has been provided, I do not consider this Condition has been fully satisfied, and cannot advise it is discharged.

Yours sincerely.

Anita Parry, Ecology Advisor Hertfordshire Ecology