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**Date:** 15 December 2023

Dear Mark,

**Application:** Demolition of existing buildings and erection of 14 dwellings.  
**Address:** Wells Farm, Northaw Road East, Cuffley, Potters Bar, Herts. EN6 4RD  
**Application No:** [6/2020/3451/MAJ](#)

### **ECOLOGICAL IMPLICATIONS**

Thank you for consulting this office on the above application.

#### **Overall Recommendation:**

- Application can be determined with no ecological objections based on the current BNG plans proposed (with any conditions/Informatives listed below).

#### **Summary of Advice:**

- Revisions to the BNG plan need to be made to include GCN habitat creation.
- A Condition for an updated Biodiversity Gain Plan.

#### **Supporting documents:**

I have made use of the following documents in providing this advice:

- Biodiversity Net Gain Plan – 29/11/2023
- Biodiversity Metric Calculations – 29/11/2023

### Comments:

Previous comments made by Hertfordshire Ecology advised Biodiversity Net Gain for this development (06/05/2021 & 30/09/2021). Since these comments a Biodiversity Metric and Gain Plan have been submitted. These BNG documents demonstrate a habitat biodiversity unit change of 11.61% and 281.17%. in hedgerow units. The calculations are consistent with the habitat baselines from the Preliminary Ecological Appraisal and appear justified and in line with BNG good practice principles. I have no reason to dispute the BNG plans on this basis.

However, it should be noted that some of the BNG proposed is in areas of the site that will be private gardens, which cannot be subject to any planning control in respect of their retention as grassland or future management. This means that the species rich hedgerow, modified grassland, and tree planting in these areas may not be able to be retained long-term due to private use and ownership of these spaces. However, given that these habitats deliver a small proportion of the overall total habitat units for on-site habitat creation I do not see this as a significant.

The Net Gain Plan states that the trading rules have not been satisfied as the need to remove a pond on site (a priority habitat) should require compensation with the same habitat type. This has not been satisfied because the metric states that two compensatory ponds will be created as part of SUDS, but these do not meet the same distinctiveness score. They will also need to have permanent water if they are to be suitable for Great crested newt breeding. However, the additional ponds and adjacent habitat creation (under GCN mitigation licence) on western adjacent land within the site owner's boundary is not currently included in the metric. Once the design for the off-site GCN habitat provisioning (both terrestrial habitat and aquatic) has been confirmed, this should be incorporated accordingly into a revised metric as stated within 6.3.2 of the current Gain Plan, which will also inform an appropriately updated Biodiversity Gain plan. The existing Gain Plan does not describe seed mixes for the Other Neutral Grassland, or their management over 30 years, which must also take into account its location beneath mature trees.

On this basis I advise that any permission granted for this application is done so with the following Condition for a Biodiversity Gain Plan. This should demonstrate how the habitat creation and enhancement will be delivered and secured on-site for long-term biodiversity benefit. This would supersede the previous LEMP condition advised.

[Suggested Wording]

“Development shall not commence until an updated biodiversity gain plan (BGP) has been submitted to, and approved in writing by, the local planning authority. The content of the BGP shall be informed by an updated metric to ensure the delivery of a minimum of 10% net gain in biodiversity and should also include habitat management plans for the GCN pond and terrestrial habitat creation. The Biodiversity Gain Plan shall take account of the principles within the latest submitted Biodiversity Net Gain Plan (dated November 2023), and include the following:

- a). Description and evaluation of features to be managed;
- b). Ecological trends and constraints on site that might influence management;
- c). Aims and objectives of management;

- d). Appropriate management options for achieving aims and objectives;
  - e). Prescriptions for management objectives;
  - f). Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period);
  - g). Details of the body or organisation responsible for implementation of the plan;
  - h). Ongoing monitoring and remedial measures;
- The approved plan shall thereafter be implemented in accordance with the approved details.”

All advice on other ecological matters previously addressed, not mentioned above, is still advised.

I trust these comments are of assistance,

Regards,

Fenella Stacey  
Assistant Ecological Advisor, Hertfordshire LEADS

*Hertfordshire LEADS provides Landscape, Ecology, Archaeology, Design and Sustainability support to planning departments in Hertfordshire.*