

# HERTFORDSHIRE ECOLOGY

Providing ecological advice to Hertfordshire's Local Planning Authorities

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Ask for: Anita Parry  
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Date: 18/05/2022

Dear Louise,

**Application Reference:** 6/2021/2125/MAJ

**Proposed development at:** Hertfordshire Constabulary Stanborough Road Welwyn Garden City AL8 6XF

**Proposal:** Partial redevelopment of the Hertfordshire Constabulary Headquarters site

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

## Summary of advice

- Insufficient information on bats to satisfy the Habitats and Species Regulations and for determination.
- Bat surveys need to be completed prior to determination.
- Follow recommendations for nesting birds and invasive species.
- Condition a LEMP to demonstrate biodiversity enhancements and net gain can be achieved.

## Comments

I am pleased to see an ecological report has been submitted in support of this application – *Preliminary Ecological Appraisal, 9 July 2021* prepared by AECOM.

The site was visited on 17 September 2020, and partially on 1 July 2021. It comprises a number of buildings (used as Hertfordshire Constabulary Headquarters), hardstanding car parking, amenity grassland (lawns), commemorative garden and other ornamental planting, beech / species-poor hedgerow, and occasional scattered trees.

## Bats

The daytime Preliminary Roost Assessment (PRA) undertaken in 2020 found no bats or evidence of bats. However, three buildings were assessed to have *low* potential to support roosting bats. Following Bat Conservation Trust best practice guidelines, one follow-on nocturnal bat roost activity survey is recommended to further inform any use of these buildings by bats, and to provide appropriate mitigation to safeguard them if present and affected by the proposals. Bat roost activity surveys can only be carried out in the summer months when bats are active, usually between May and August, or September if the weather remains warm.

It is also recommended that more detailed inspection is needed on several other buildings to establish their roost suitability (ref Table 9 in the ecological report). Some of these buildings are proposed for demolition. Inspection surveys for bats can be undertaken at any time of year.

As bats are classified as European Protected Species (EPS), sufficient information is required to be submitted to the Local Planning Authority *prior to determination*, so it can consider the impact of the proposals on bats and discharge its legal obligations under the Conservation of Habitats and Species Regulations 2017 (as amended). It is not regarded best practice to condition bat surveys.

**Currently there is insufficient information on bats for determination.** It is disappointing that the need for further bat surveys has been known since 2020 but not undertaken subsequently, and particularly not during the 2021 activity survey season, as far as I am aware. The ecological report and Design & Access Statement state that a separate bat report will be provided but this does not appear to be available.

We are now in the 2022 bat activity season and consequently, **my advice is the application should not be determined until the outstanding inspection surveys (PRA) and any recommended bat roost activity surveys have been undertaken and the results submitted to the LPA for written approval.**

### Trees

The habitats are generally of limited ecological significance. A number of trees are proposed for removal; however, these are largely low or moderate quality and plenty of replacement planting is proposed.

Existing trees (including roots and overhanging branches) that are remaining on or adjacent to the site should be protected from damage. Protection barriers and/or a no-dig policy may be required, and advice should be sought from an Arboriculturist.

None of the trees proposed for removal have potential for roosting bats. Some have potential for nesting birds and recommendations to avoid an offence being committed are made in section 5.2.4.2 of the ecological report.

### Recommendations

The recommendations for bats (5.2.4.1) nesting birds (5.2.4.2) and invasive species (5.2.4.3) in the ecological report should be followed. **Bats surveys should be completed prior to determination.** The recommendations for nesting birds and invasive species can be secured by condition should permission be granted. The recommendations for ecological enhancements (for bat and bird boxes, native planting, species of benefit for biodiversity, rain garden, green walls/fences) are welcomed and should be brought together in a LEMP to demonstrate net gain can be achieved from the development. The LEMP should be secured by condition should permission is granted.

I trust these comments are of assistance.

Yours sincerely,

Anita Parry  
Ecology Advisor  
Hertfordshire Ecology