

# HERTFORDSHIRE ECOLOGY

Providing ecological advice to Hertfordshire's Local Authorities and communities

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Mark Peacock  
Principal Development Management Officer  
Welwyn Hatfield Borough Council

Ask for: Anita Parry  
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Date: 15/10/2021

Dear Mark,

**Application Reference:** S6/2015/1342/PP

**Proposed development at:** Land to the north east of King George V Playing Fields,  
Northaw Road East, Cuffley, Hertfordshire, EN6 4RD

**Proposal:** Outline planning application for residential development of up to 121 dwellings, associated infrastructure and a change of use from agricultural land to an extension of the King George V playing field. All matters reserved except for new vehicular access to serve the site, the provision of surface water discharge points and the levels of development platforms

Thank you for consulting Hertfordshire Ecology on the above. I apologise for the delay with this reply. The application is supported by a number of ecological reports prepared by *Hankinson Duckett Associates in January 2021*.

- *Updated Ecological Appraisal*
- *2020 Bat Survey Report*
- *2020 Reptile Survey Report*

The site is undeveloped land and comprises a single arable field (principal site) bordered by hedgerows, tree lines, a ditch and railway embankment. A small parcel of land adjacent to the Tennis Club (proposed as an extension to the playing field) is also part of the application site. The arable field is considered to be of negligible ecological value. The boundary trees and hedgerows, which are proposed for retention, are of limited ecological value in their own right, although together the linear features do provide important corridors for commuting and foraging bats. The smaller site is described as agricultural land.

The proposals involve construction of 121 dwellings and associated gardens and parking, some communal areas and a SUDS feature. It will result in the loss of the arable habitat. The reports provide adequate assessment of the impact of the proposals and are based on appropriate survey methods and effort. The likelihood of an adverse ecological impact is negligible-low, but the reports suggest reasonable precautionary measures to ensure that legally protected species are not harmed.

Funded by the following LPAs:

HERTFORDSHIRE COUNTY COUNCIL, DACORUM BOROUGH, EAST HERTFORDSHIRE DISTRICT, HERTSMERE BOROUGH, NORTH HERTFORDSHIRE DISTRICT, ST ALBANS DISTRICT, THREE RIVERS DISTRICT, WATFORD BOROUGH, WELWYN HATFIELD BOROUGH

The reports include a range of recommendations and enhancement measures which are reasonable and compliance with them should be ensured through the application of an appropriately worded condition at the relevant planning stage (now or Reserved Matters, whichever is appropriate).

The planning system should aim to deliver overall net gains for biodiversity where possible as laid out in the National Planning Policy Framework and other planning policy documents. As the proposal will result in the loss of the existing arable habitat - albeit of negligible intrinsic ecological value - the LPA needs to be satisfied that the overall impact of the development is beneficial to biodiversity. Furthermore, the recent Environment Bill gives greater emphasises to *measurable* biodiversity net gain and advocates using the current version of the Natural England Biodiversity Metric (v 3.0) where appropriate. Although biodiversity net gain is not yet mandatory and cannot be used as a reason for refusal, this metric would provide a useful mechanism to demonstrate that measurable net gain can be delivered, and I would support its use in this case.

Overall, I have no objection to the principle of development at this site. I do not anticipate there to be any significant ecological constraints that would prevent consent being granted, subject to appropriate mitigation and enhancement measures being implemented. All mitigation, enhancement and offsetting measures should be reflected in relevant documents (such as a Landscape and Ecology Management Plan, biodiversity metric calculation spreadsheets, Biodiversity Gain Plan), which I would expect to be submitted to the LPA at the Reserved Matters stage for written approval once further landscape and enhancement details are known.

I trust these comments are of assistance.

Yours sincerely,

Anita Parry  
Ecology Advisor  
Hertfordshire Ecology