

HERTFORDSHIRE ECOLOGY

Providing ecological advice to Hertfordshire's Local Authorities and communities

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

ecology@hertfordshire.gov.uk

Tel: 01992 555220

Mr David Elmore
Senior Development Management Officer
Welwyn Hatfield Borough Council

Ask for: Anita Parry
Tel: 01992 556149

Date: 26/02/2020

Dear David,

Application: Outline planning permission for the erection of 39 dwellings, vehicular access and provision of open space, with appearance, landscaping, layout and scale reserved

Address: Land south-west of Filbert Close, Hatfield, AL10 9SH

Application No: 6/2019/2162/OUTLINE

REVISED COMMENTS

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

I am pleased to see an ecological report has been submitted in support of this application – *Preliminary Ecological Appraisal (Pell Frischmann, August 2019)*. The site was visited on 13 July 2017. The application site is on the former Hazel Grove School playing fields and comprises improved grassland, planted trees (transitioning into broadleaf woodland and scrub), mature cherry trees and cherry suckers, an old hedge line with trees, species-poor hedgerow, tall ruderal / colonising vegetation, and a small area of hardstanding tarmac. The site is surrounded on three sides by housing and on one side by the semi-natural grassland and woodland habitats of the adjacent Public Open Space.

The proposals will result in the loss of all habitats on site, except some boundary trees. The habitats have site-based ecological value, with at least some natural character and ecosystem service function. The site also has potential to support nesting birds, foraging / commuting / roosting bats and reptiles.

I have no objection to the principle of development at this site; however I have the following comments to make, most notably on biodiversity net gain:

Trees

Trees should be retained where possible. 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 will be required and advice in the Arboricultural Report should be followed.

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The loss of trees should be compensated for, and the loss of *mature* trees should be replaced on a two-for-one basis, at least. New trees and shrubs should be predominantly native species, particularly those that bear blossom, fruit (berries) and nectar to support local wildlife. Where non-native species are used they should be beneficial to biodiversity, providing a food source or habitat for wildlife.

Birds

The trees and scrub on site may have potential to support nesting birds. To avoid an offence being committed, any significant tree/shrub works or removal should be undertaken outside the nesting bird season (March to August inclusive) to protect breeding birds, their nests, eggs and young. If this is not practicable, a search of the area should be made no more than two days in advance of vegetation clearance by a competent Ecologist and if active nests are found, works should stop until the birds have left the nest.

Bats in trees

Some of the trees have been identified to have potential bat roosting features and **if these trees are to be removed, they should be subject to a bat assessment and possible pre-felling climbed inspection and/or activity surveys at the Reserve Matters stage - when it will be known which trees are to be affected.**

Reptiles

Surveys following best practice were undertaken in 2018 and concluded a likely absence from the site. No further survey or mitigation is required.

Lighting

Any external lighting scheme should be designed to minimise light spill, in particular directing light away from the boundary vegetation to ensure dark corridors remain for use by wildlife as well as directing lighting away from potential roost / nesting sites. Consequently, a suitable **Lighting Scheme** will be required at the appropriate stage which demonstrates the location and nature of the proposed external lighting and measures to avoid increasing light pollution. This should include details on the type of lighting, design of lamps and luminaires.

Biodiversity net gain and enhancements

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. Some simple biodiversity enhancements have been suggested for bats, birds and invertebrates; and by planting trees, shrubs and wildflowers. However, these could be expanded to include native species hedgerow planting (and in-filling of gaps) around the site boundary to maintain and enhance wildlife corridors in the local area, orchard and fruit tree planting to attract pollinators and support local wildlife, provision of gaps under fencing to allow free movement of small mammals (e.g. hedgehogs) and amphibians, etc. Biodiversity enhancements should be considered at an early stage to avoid potential conflict with any external lighting plans.

Any biodiversity enhancements will contribute to the local biodiversity resource; however they are unlikely to fully replace the value of any habitats lost and provide net gain and this should be addressed. If this cannot be adequately achieved within the development site, the LPA should request biodiversity offsetting - along with a 10% expected enhancement - to achieve overall net gain in biodiversity which meets the aims of NPPF.

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Delivering net gain will become mandatory in the future and we are still awaiting more detailed guidance from Government on this matter as to what will be expected and how in terms of planning requirements. Currently, there are tested means of demonstrating measurable net gain. A revised **DEFRA metric (2.0) was part of the recent Government consultation and I would advise this should be used to demonstrate net gain can be achieved from the development.** This approach would help to determine whether any offsite enhancements are required to deliver the net gain sought. **Details, including a 'biodiversity gain plan' with the complete metric calculation (Ref: Schedule 14, para 14 of Environment Bill 2020), should be provided to the LPA at the Reserve Matters stage or by subsequent condition, once further landscape / enhancement details are known.**

I trust these comments are of assistance.

Yours sincerely,

Anita Parry
Ecology Advisor
Hertfordshire Ecology

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