

Planning Position Statement

Herts & Middlesex Wildlife Trust (HMWT) works to influence the planning process to protect biodiversity and secure enhancements for wildlife. HMWT engages with planning at both a strategic level, through commenting on local plan documents, and at the development control stage, through commenting on individual planning applications. Our planning work covers the whole of Hertfordshire.

Our approach to planning

HMWT considers each development on its own merits. We do not take an 'anti-development' stance. This enables us to differentiate those development proposals of greatest ecological concern and focus our efforts on securing positive outcomes for biodiversity. We make every effort to ground our planning work on sound information, provided without bias. Through taking a professional and measured approach, we strive to foster constructive relationships and ultimately deliver positive results for the county's wildlife.

How we prioritise our planning work

HMWT's planning work currently depends entirely on income from our membership. We seek to make the greatest positive impact for wildlife from our limited resources by prioritising staff time as follows:

1. Involvement in local strategic planning.
2. Applications that will result in direct or indirect damage to a Local Wildlife Site (or SSSI).
3. Applications affecting viability of habitat networks or green infrastructure networks in Trust priority areas.
4. Applications resulting in net losses to biodiversity as determined by the DEFRA biodiversity assessment metric.
5. Applications with opportunities for significant biodiversity enhancements in priority areas.
6. Applications with opportunities for significant biodiversity enhancements in other areas.
7. Applications that will affect protected species.

Within our responses, we advise prevention or minimisation of damage to wildlife, through avoidance of impact in the first instance, followed by mitigation, compensation, and finally enhancement to benefit wildlife wherever possible.

HMWT considers planning applications solely in relation to their impacts on wildlife rather than on broader environmental sustainability, public amenity or landscape issues. However, we may highlight these issues where this would add weight to a response made on wildlife grounds.

Local and Neighbourhood Planning

HMWT's first priority in planning matters is to influence planning policy documents, such as local and neighbourhood plans. If we can ensure that robust and effective policies are included in district and parish planning documents across Hertfordshire it will mean a



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Sir Simon A Bowes Lyon, KCVO

simpler, faster, less antagonistic planning debate and most importantly, better results for wildlife and people.

Local Wildlife Sites in Hertfordshire

The protection of sites of Local Wildlife Site standard within Hertfordshire is extremely important to us. Local Wildlife Sites (which may also be called 'County Wildlife Sites', 'Wildlife Sites' and 'Sites of Importance for Nature Conservation') are selected by the Hertfordshire Wildlife Sites Partnership based on a set of agreed selection criteria relevant to the county. These represent the best habitat areas we have outside of statutory designated nature conservation sites. These sites provide essential wildlife refuges and are key components in the local ecological network, acting as stepping stones or corridors between statutory sites. They are therefore critical to the delivery of a Living Landscape.

Sites of Special Scientific Interest

Natural England deals comprehensively with planning issues affecting Sites of Special Scientific Interest (SSSIs). HMWT will therefore generally not devote time to commenting on applications affecting SSSIs, unless they concern a Wildlife Trust nature reserve, or opportunities exist for significant biodiversity gain.

Habitat networks and living landscapes

Our ecological networks mapping system enables us to see where the critical connections are for wildlife in Hertfordshire. We will comment on development which we believe compromises habitat connectivity and landscape scale conservation efforts.

Net gain in biodiversity

National planning policy seeks to ensure that development conserves and enhances the natural environment resulting in net gains to biodiversity. For net gain to be more than a concept it must be measurable. HMWT advocate the use of the DEFRA biodiversity assessment metric to quantify and legitimise net gain. We will object to planning applications that do not result in measured net gain.

Significant biodiversity enhancements

Opportunities to make significant gains for biodiversity are often limited merely by imagination. Where we see a chance for a significant ecological gain (e.g. species mixes or integrated boxes) we will contribute to the planning process, particularly in priority areas.

Protected species

Due to the strength of the policy and legislation that protects them and a lack of resources to cover all potential protected species issues, The Wildlife Trust will only become involved if they have specific local knowledge of the affected population or there is a reasonable likelihood of the presence of protected species that could be negatively affected by a proposal. Where time permits and there is a reasonable likelihood of the presence of protected species and no ecological information has been submitted, the Trust will object to the application until a suitable survey has been submitted.

22 January 2018