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22nd April 2025

Dear Leanne Pogson,

**5/2023/1923 Land Between The Alban Way And Colney Heath Lane St Albans Hertfordshire
Outline application (access sought) - Construction of up to 190 dwellings to include 50% affordable housing and 10% self-build and custom housing, a minimum of 6ha of public open space, landscaping, biodiversity habitat, formation of new access and all ancillary works.**

Buglife - The Invertebrate Conservation Trust would like to make the following comments on the above planning application.

Buglife objects to this planning application on the following grounds:

Adverse impacts on a diverse invertebrate assemblage

As detailed in the Invertebrate Survey Report (David J. Gibbs, August 2024), the mosaic of habitats on site supports a diverse invertebrate assemblage, likely to be of regional importance. 410 species were recorded in just three days of sampling of which over 10% have a conservation or rarity designation. It is generally considered that sites supporting 10% of species of conservation concern are of national importance, indicating the quality of this site for invertebrates. Species recorded included the Vulnerable Spike-rush Mourner Sawfly (*Dolerus anticus*), the Nationally Scarce Jewel Beetle *Agrilus viridis* and the Vulnerable Small Heath Butterfly (*Coenonympha pamphilus*), a Priority Species under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. Further survey effort in early spring and autumn would likely confirm the presence of other species of conservation concern and enable a more comprehensive evaluation of the importance of the site for invertebrates.

In addition to this survey, Buglife are aware that 16 species of dragonfly have also been recorded breeding in the wetland habitats on the site¹, and they are one of the key interest features of this Local Wildlife Site (LWS). Species include the Near Threatened Scarce Emerald Damselfly (*Lestes dryas*),

¹ Brooks, S. 2020. Smallford Pits Hertfordshire Local Wildlife Site. Dragonfly (Odonata) interest 2020

nationally rare and known from only two other sites in the county. The majority of these water features, particularly the small pools which support the main breeding populations of dragonflies will be lost to the development.

Insufficient invertebrate surveys

Whilst some survey effort has been undertaken for terrestrial invertebrates, there has been no assessment of aquatic invertebrate populations, despite the presence of both permanent and ephemeral water bodies, the majority of which will be lost to the development. The variety of waterbodies on the site from permanent ponds to others that are only wet in winter, presents a wide range of habitat conditions which could support a diverse invertebrate assemblage. The established importance of the ponds to dragonflies is further indication of high-quality habitat and therefore these features are likely to be importance to other invertebrate groups, particularly as the ponds are uncommon features in the wider landscape. To adequately inform impact assessment and mitigation proposals, surveys should be undertaken prior to a decision being made.

Impacts to Smallford Pits Local Wildlife Site

The Environmental Impact Assessment (FPCR, 2023) states the development “*will result in the loss of approximately 15% of the total area of the LWS*”. The value of this site for invertebrates is in the whole site-wide mosaic and therefore this loss of area that includes both wetland and grassland habitats will be extremely detrimental.

Paragraph 192 a) of the National Planning Policy Framework (NPPF) places a duty on local authorities to “*Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation*”. LWS are those local wildlife-rich habitats that are vital areas for providing ecological connectivity across the landscape. This development will reduce and erode the habitat mosaic, with potentially wider impacts across the LWS network. Even with the proposed mitigation, the proposals are likely to lead to the loss in diversity and abundance of the dragonfly population, one of the key features of this LWS.

Further adverse impacts on the LWS from an adjacent residential development have not been assessed. This includes the effects of Artificial Lighting at Night (ALAN) and increased recreational use of the site. ALAN has numerous direct and indirect impacts on both terrestrial and aquatic invertebrates, including exhaustion, increased predation, and a disrupted ability to navigate². Evidence shows an increase in ALAN above 0.5 lux can impact the natural behaviour of living things. The situation is so serious that light pollution is reducing nocturnal pollinator visits to flowers by 62% in some areas³. Whilst the EIA states that “*lights will not be shone on the LWS*”, there will inevitably be increased lighting levels from the development, including light spill from properties and external lighting from residents beyond the control of the applicant.

² [Impact of artificial light on invertebrates Final docx](#)

³ [Artificial light at night as a new threat to pollination | Nature](#)

Inadequate mitigation proposals

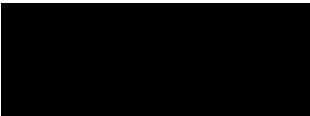
Much of the mitigation centres on enhancing the retained habitat features on site, features that are already supporting a diverse invertebrate assemblage and therefore the actual benefit this will provide against the loss of habitat area is unclear. As no surveys have been undertaken for aquatic invertebrates (aside from information available on dragonflies), management of wetland features is not informed and therefore the resulting outcomes of the enhancement measures will be unknown. The creation of permanent ponds and several scrapes have been designed with primary consideration for Great Crested Newt (*Triturus cristatus*). The new scrapes do not compensate for the loss of the mosaic of ephemeral pools to dragonflies as they are unlikely to recreate the varying conditions currently present that are so important for dragonflies. There will be an overall loss of wetland habitat, with all the scrapes located in a narrow buffer strip close to the development.

In summary, Buglife objects to the current proposals as it considers it will lead to a loss of an area of LWS that supports a diverse assemblage of invertebrates of at least regional value. Proposals will be detrimental to the dragonfly fauna, one of the key interest features of the site. A full assessment of the impacts on invertebrates has not been made. Overall, even with the mitigation proposed, there will be an overall loss of biodiversity on the site and wider impacts to the LWS network which should be safeguarded from inappropriate development in line with national planning policy.

Buglife urge St Albans City and District Council to refuse this application.

Please do get in contact if you require any further information.

Yours sincerely



Gemma Waters
Saving Sites Officer