

Ref: 25/03080/HYA

Location: GA2, Land North-East Of Great Ashby Stevenage Hertfordshire



**Proposal:** Hybrid application for a residential-led development comprising residential (Use Class C3), educational use (Use Class F1), a community hub (Use Class F2) with associated new internal roads, access, parking, cycling infrastructure, landscaping and other associated infrastructure. Full application comprises the construction of vehicle access and an active travel link via Mendip Way, with associated landscaping and drainage works. The outline application, for which all matters are reserved except means of access, comprises the erection of up to 640 dwellings (Use Class C3), a site for a primary school, further land reserved for educational use (Use Class F1), a site for a community hub (Use Class F2), with associated infrastructure.

Herts and Middlesex Badger Group (Charity No. 1076878) is a volunteer group dedicated to protecting badgers and their habitats in Hertfordshire and Middlesex. For over a decade, we've raised concerns about this site—submitting surveys and expert recommendations from Dr Jenny Jones (MCIEEM). Our key issues include insufficient attention to active badger clans, weak mitigation measures, ineffective wildlife corridors, damaged habitat links, and poor ecological monitoring. Despite our input, badger welfare has been overlooked for development.

### **Badger Welfare Concerns**

HMBG rarely opposes developments, but GA2 poses a serious threat to badger welfare. We formally object to GA2 as currently proposed.

While we acknowledge the need for housing and the Local Plan designation, we believe this proposal will immediately harm protected badgers and fails to offer adequate habitat for their future survival.

Badger setts and foraging areas occupy 60% of the site, with high density and coverage. When first proposed in 2015, we partially objected, recommending changes to protect foraging land and re-route access. Since then, the site has expanded to include land used by a large badger clan, prompting HMBG's full objection.

When the site was first proposed in 2015 on a smaller scale, we suggested removing the land between the pylons, Nine Acre Wood, and Brooches Wood for foraging and protection, and recommended rerouting the access road. Although designated as green belt, the site potentially met requirements for protected species. Later expansion included land occupied by a large badger clan, leading HMBG to fully object.

HMBG has been monitoring badger activity in the area since 2015, initially led by Keith Higby and continued by HMBG's leadership and local experts. Concerns about wildlife on the GA2 site have been consistently raised.

**Legal protection of badgers** Badgers and their setts are protected under the Protection of Badgers Act 1992 so as you will be aware is an offence to:

- damage or destroy a badger sett
- obstruct access to a sett
- disturb a badger while occupying a sett.

Where development risks such offences, planning authorities must ensure that impacts are avoided or appropriately mitigated before planning permission is granted.

### ***Our fears for GA2 Badgers***

*European Badgers are a territorial species, living in clans, requiring safe access to foraging grounds or they will be forced into danger and conflict with human activity or with other clans. It is a scenario our badger group have sadly witnessed over the years. Where badgers are not properly mitigated for or become displaced, members of the public call us for advice on how to stop them encroaching or damaging their gardens. These issues occur, often for years or until a clan is dispersed or wiped out.. If the badgers are not protected during GA2 development they will be likely displaced into gardens and under sheds in the new development or into Great Ashby. Where badgers are forced to cross roads, fatalities and injuries may eventually threaten the health or survival of a whole clan. As advised during the local planning process - There are 2 clans of badgers that live within the GA2 site. The badgers are unable to safely move to the east as there is a further clan inhabiting that area. They are unable to safely move south due to development or west due to flooding making that land unsuitable for successful setts. On GA2 the badger mitigation needs to be carefully planned in advance and due to the density of the population it needs to be central to the development plan, taking into account the legal requirement to protect badgers before, throughout and after development. We are far from convinced that this will be the case and would like to see more detailed plans on how this is to be achieved*

### ***Concerns Regarding GA2 Badgers***

*European Badgers are territorial animals, living in social groups that require secure access to foraging areas; without this, they may be exposed to increased risks through interaction with human activity or other clans. These scenarios have been repeatedly observed by our group over the years. When badger mitigation is insufficient or displacement occurs, members of the public often approach us for advice on preventing encroachment or damage to their properties. Such issues can persist for years, or until a clan is dispersed or eliminated. If adequate protection is not provided during GA2 development, badgers are likely to be displaced into residential gardens, under sheds in new developments, or into Great Ashby. Forced crossings of roads can result in fatalities or injuries, potentially undermining the health and survival of entire clans. Local planning guidance has identified two clans residing within the GA2 site. Safe movement eastward is impeded by an existing clan, while southerly movement is restricted by ongoing development and westerly movement by unsuitable flooded land. Effective mitigation must be carefully integrated into the GA2 development plan, given population density and existing legal protections required before, during, and after construction. We remain unconvinced that these measures will be fully addressed, and request more comprehensive plans detailing how badger protection will be implemented.*

*GA2 was originally given 'significant contribution green belt' status and is a haven for badgers, bats, hare, deer, numerous bird species including some on the red list and insects. It is also a vital local amenity for thousands of local residents as well as a key habitat for a thriving population of local badgers.*

*As you will be aware, during the local plan process, many organisations were contacted for evidence and we would like to revisit some points made by HERC at that time.*

*HERC advised in their submission that 'the open farmland ecology is of some interest' and mentioned numerous species.*

*They then advised the following:*

*2.6.2 The most overriding feature of this area is the pattern of fields and small woodlands and their existing connectivity. **Any major development MUST ensure that the woodlands remain connected in some way - the recent developments and resulting isolation of some woods at Great Ashby MUST be avoided if at all possible.** Development immediately adjacent to the woodlands on the edge of Stevenage should not be repeated on their other side. The provision*

*of suitable GI to achieve this must therefore be carefully planned if the ecological functionality of the woodlands and hedgerows is to be maintained.*

GA2, designated as a 'significant contribution green belt', supports diverse wildlife—including badgers, bats, deer, red-listed birds, and insects—and serves as an important amenity for local residents. During the local plan review, HERC noted the area's valuable farmland ecology and species diversity. HERC emphasized that preserving field and woodland connectivity is crucial; any major development should prevent woodland isolation, which has occurred at Great Ashby, and adjacent development to Stevenage's woodlands should not be repeated. Proper green infrastructure planning is needed to maintain ecological functionality.

*2.6.3 There would not appear to be any overriding ecological interest that would represent a fundamental constraint on development within this area. However, again there would clearly be a loss of farmland ecology which given the hedgerows and grasslands at this location would have at least a moderate impact locally. However we have no information to suggest there is any significant value, at least sufficient to prevent development **assuming an acceptable layout can maintain suitable connections between woods and provide a variety of grasslands.***

*2.6.4 Community orchards and a positive approach to ecological management of grasslands would be particularly beneficial given the countryside and ecological character that would otherwise be lost.*

*With HERCs moderate observations in mind, HMBG is alarmed that Nine Acre Wood looks to become encircled and isolated by road and developments. Even with a 20 mph speed limit the habitat will be fragmented by what is to be a main bus route. Our request, (unpopular with the developers) is that the proposed development be reduced to the eastern side of Nine Acre Wood, in order to allow connection with Newberry Grove. The plans for a community orchard and meadow are to be welcomed but not placed so badgers have to cross a road for reasons previously mentioned. We would suggest that the proposed orchard and meadow should be incorporated to the east of Nine Acre Wood to solve a variety of issues and provide habitat connectivity. We also note that the wildlife pond to encourage a variety of species runs parallel to a 50mph road to Weston. With its poor placement and substantial loss of foraging area for the badgers, what should be a welcome measure, heightens the risk for badgers moving across the estate. These and other measures proposed do not seem to be based on proper studies of the badgers on site, their current habits, paths, foraging, latrine areas. Development cuts across current paths, sometimes needlessly and with no replacement of suitable foraging land or alternative suitable habitat. Tunnels proposed are not placed appropriately so unlikely to do the job intended. If these are to become part of the development, we would also like a commitment on who is to maintain them or they become pointless. We would also like it noted that dog walking areas can pose a threat to badgers and recreational areas are not the same as wildlife corridors, which by nature are dark and provide cover and safety.*

HMBG is concerned that Nine Acre Wood will be isolated by roads and development, even with a 20 mph speed limit, fragmenting the habitat due to a main bus route. We urge that development be limited to the eastern side to allow connection with Newberry Grove. While plans for an orchard and meadow are positive, they should be placed east of Nine Acre Wood to avoid forcing badgers to cross roads and ensure habitat connectivity. The wildlife pond's placement next to a 50 mph road reduces safe foraging for badgers, increasing risk. Proposed measures lack proper study of the badgers' habits and current paths, with new development disrupting them and offering no suitable alternatives. Tunnels are not correctly positioned or maintained, and dog walking and recreational areas do not substitute wildlife corridors, which require cover and darkness for safety.

HMBG expresses significant concern regarding the potential isolation of Nine Acre Wood caused by surrounding roadways and ongoing development, which may fragment the habitat even with implementation of a 20 mph speed limit due to the proposed main bus route. We recommend that future development be confined to the eastern side of Nine Acre Wood to preserve connectivity with Newberry Grove.

While the proposals for a community orchard and meadow are welcomed, their placement should be carefully considered to prevent badgers from needing to cross roadways, thereby maintaining effective habitat connectivity. We suggest integrating these features to the east of Nine Acre Wood, which would address multiple ecological considerations.

The current positioning of the wildlife pond adjacent to a 50 mph road presents safety concerns, as it reduces available foraging land for badgers and increases their risk when moving across the estate. Furthermore, several measures appear not to be informed by comprehensive studies of the local badger population, including their established routes, foraging grounds, and latrine areas. The planned development disrupts existing paths without providing suitable alternative habitats or foraging options.

Additionally, tunnel placements do not align with natural path usage and lack clarity on long-term maintenance responsibility, which is essential to ensure their effectiveness. It should also be noted that designated dog-walking and recreational areas pose risks to badgers and do not serve as adequate substitutes for wildlife corridors, which must offer cover and darkness to support species safety and movement.

*As there are so many problem areas on this development, HMBG request that moving forward, appropriate advice is sought and taken seriously. It does not inspire any confidence that we found out about even this consultation by accident,*

Given the numerous issues with this development, HMBG requests that advice be properly sought and followed. Discovering this consultation by chance undermines confidence.

*HMBG supports submissions from Great Ashby Local Council, Tom Langton, Herts Wildlife Monitors, and Badger Trust, and appreciates their input.*

*Thank you for considering this matter.*

Christine Wood  
Co-Chair  
Herts and Middlesex Badger Group  
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