

Officer Liz Anderson – Ecologist
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Ref: 24/01013/OP
Att: Sarah Kasparian

Land Surrounding Burloes Cottages, Newmarket Road, Royston, Hertfordshire,

Hybrid application for residential development of up to 325 dwellings comprising (a) full planning application for Phase 1 comprising 102 dwellings and associated infrastructure including access from Newmarket Road, emergency and pedestrian/cycle access from Burloes Hall Drive, internal highways, public open space, landscaping and drainage and b) outline application for up to 223 dwellings and associated infrastructure with all matters reserved apart from primary means of access and emergency and pedestrian/cycle access from Burloes Hall Drive.

Consultee comments;

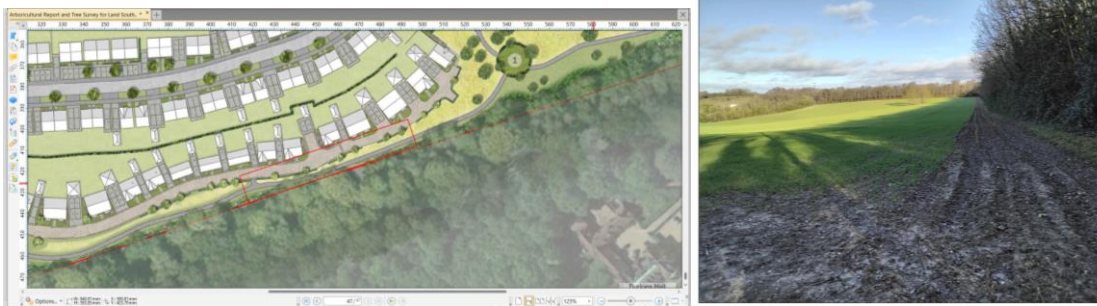
Having read thorough the submitted documents my greatest concern lies with the treatment of the southern boundary. Policy NE4 of the NHC Local Plan requires 12 metres of ‘... *complementary habitat* to be provided around wildlife sites, trees and hedgerows.’. Reasoning behind such a buffer stemmed from the North Herts District Green Infrastructure Plan where it recognises the need to ‘*Retain existing tree and hedgerow lines within future development to provide benefits in terms of connectivity and shading/cooling. Appropriate buffer and root protection zones (12 metres, or the root protection area defined by a tree survey, whichever is the greater).*’.

The development site is surrounded on all sides by trees and woodland, 3.28 of the Ecological Appraisal (EA) says ‘*The boundary habitats on site plantation broadleaved woodland were considered to provide suitable opportunities for commuting and foraging bats. In addition, these habitats were well connected to further areas of suitable commuting, foraging and roosting habitat offsite, including a surrounding woodland network*’. The presence of badgers has also been confirmed on site and as such it is essential that semi-natural habitat is adequately buffered to prevent disturbance from lighting and ideally limit cat predation and other disturbance as a result of the additional footfall from new residents.

8.25 of Planning Statement says of NHLP Policy NE4 ‘*the proposals allow for an ecological buffer around the site. The policy requires a 12m buffer and whilst we have sought to achieve this where possible, and indeed often over provided for example in the south-east corner and along the eastern boundary, in some places the buffer only extends to 6m. However, given that the proposals are enclosed by substantial planting and 10% BNG will be delivered, it is considered that an appropriate buffer has been provided.*’ I disagree with this as the buffer has been used to accommodate access routes around the site. It is perfectly acceptable to have mown pathways through species rich grassland but the illustrative framework plan infers surfaced paths which do not count as complementary, nor would they be counted towards BNG calculations. 4.28 of the EA suggests buffers will include ‘...meadow grassland and broadleaved tree planting. SuDS and swale habitat are further proposed’. These would all be considered complementary.

The red rectangle on the image below indicates approx. 12m buffer whereas actually less than 6m is shown on one of the most sensitive edges. Not only is this detrimental to wildlife but having homes in

such close proximity to woodland is also detrimental to householders being in overshadowed homes, particularly in the winter as the photo shows.



It would be preferable for any walking/ access route to be accommodated within the shared surface and the buffer to be widened and defined by a knee rail to deter car parking. The Arboricultural Report suggests that the holly trees (G10) along this edge which currently form an unmanaged hedge be maintained as a hedge. This would be beneficial both ecologically but also aesthetically and would help to control access to the woodland.

In 8.29 the Planning statement claims that *'In accordance with Policy NE4 (Biodiversity and Geological Sites) a buffer will be provided around the site boundary and the existing tree in the centre of the site'* Whereas fig 5.13 in the DAS showing Green Infrastructure diagram fails to indicate such a buffer around the retained trees. Further, positioning the LEAP in the SE corner is potentially at odds with the retained badger sett and should ideally be relocated.

As a point of interest, historical (1924) maps show a footpath following a similar NW:SE line across the site.



Therfield Heath mitigation strategy

7.13 'The Illustrative Masterplan proposes approximately 3 hectares of open space on this site. This will be designed to provide natural habitats including the retained woodlands, meadow grassland and native species scrub planting.' According to the metric calculation 1 Ha is actually *scrub this is not open space*. That said it is acknowledged that there are extensive permissive routes adjacent to the site to provide alternative recreation space beyond that offered by Therfield Heath. A potential area to be

considered in addition is the woodland on the southern boundary to the site. Although this has Private keep out signs on it continued access onto the site is evident. As such the establishment of a 'friends of group' and biodiversity enhancement works could both deliver BNG benefit but also support a THM strategy?

BNG; it is acknowledged that the site cannot deliver 10% BNG on site which, given the arable character and potential for improved buffering of boundary habitats, is disappointing. Never-the-less the need to satisfy trading rules is understood and the provision of new, off-site woodland will be beneficial. This off-site BNG will need to be registered on the Natural England register and secured via s106.

A point of clarity in the BNG Technical note 3.3 The BNG assessment undertaken on the on-site land and the calculations within the tables outlined above will result in: • A net loss to biodiversity of -0.513 habitat units, equating to a net loss to biodiversity of 16.78%; Actually loss of **5.13** habitat units.

Recommendations;

Condition a lighting strategy to detail an appropriate sensitive lighting scheme implemented to maintain dark corridors along retained and created habitat of the development. The scheme should ensure lighting is directed to where it is needed, avoiding light spillage, particularly the retained trees, woodland, and new habitats including trees, hedgerows, SuDS habitat and grassland.

Mandatory Biodiversity Gain Plan condition which will require a Habitat Management and Monitoring Plan to incorporate a LEMP. Advance planting is valuable and would provide protection of green buffers from development, including storage of building materials and construction vehicle access.

Informative Avoid bird nesting season for vegetation clearance to form part of **CEMP** which would also cover reptiles too as detailed in 4.43 of EA.

The EA expects the on-site badger sett to require closure but we've worked hard to try to ensure this woodland remains connected with the wider woodland habitats and knowing how determined badgers can be closing the sett would seem unnecessary when badgers are likely to come back post construction anyway. I think it would be far more pragmatic to fence off the undeveloped section in the SE and have a **method statement** as part of the **CEMP** to avoid harm.

In addition to habitat creation to meet BNG on site, opportunities for ecological enhancements benefitting wildlife on individual plots should also be included with basic design techniques, such as the inclusion of integrated bat, bird and bee bricks and hedgehog holes in fences to support species integration and connectivity through the site. This can be secured via **condition**.