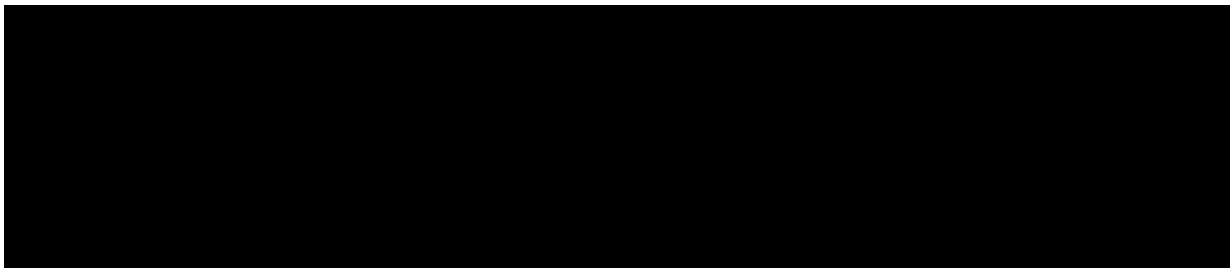


We strongly object to this application as it currently stands for the following reasons:

1. HERC previously advised on the importance of connectivity between the woodlands in the proposed GA2 area and any major development must ensure that the woodlands remain connected in some way. As we have repeatedly stated over the years, GA2 would fracture these connectivities. There are numerous hedgelines within GA2 that are used as wildlife corridors, in particular by badgers and bats; the hedgeline between Nine Acre Wood and Newberry Grove contains outlier holes, with evidence of foraging and latrines either side. The same with the hedgeline between Nine Acre Wood and Brooches. The hedgeline that runs west from the north of Longdell Wood and then south (H7), contains badger runs that have been in place for decades with outlier holes, foraging areas and latrines. Although it states in ES Vol 1 Chapter 9 Ecology 9.289 that you would be strengthening connectivity – GA2 would fragment these with access roads to each section of development. It is noted there are some under-road mammal tunnels proposed in certain areas, but as previous studies have shown – the success of mammal tunnels is due to proper planting, fencing and no human interference, the studies originally put forward by Picture SRL were those based on dual carriageways and motorways and not a housing estate. There is also nothing stated in regards to maintenance of the tunnels and fencing and who would be responsible.
2. In the plans, there is a section designated for housing in between Longdell Wood and the proposed school. This section already has an access point from the bottom of the field, but the plans are showing that H7, a mature hedgeline and wildlife corridor, would become fractured by a road to allow access to this housing. Surely using an access point already in place is more conducive to biodiversity protection than totally fragmenting a mature hedgeline that is of considerable importance?
3. HERC also stated in a report that was a submission regarding the local plan, that woodlands should not be encompassed as they have been previously 2.6.2. GA2 would see Nine Acre Wood encompassed by housing and a road. In the proposed plan, there is a large corridor from Newberry Grove to Nine Acre Wood which would be fragmented by this road and this is one of our main objections regarding this site. There does not need to be a road encompassing Nine Acre Wood. A single point access road could access F9, with a further single point access road accessing F7. This would leave an important corridor for badgers, bats, deer and other species between Newberry Grove and Nine Acre Wood. There is no reason if the site goes forward, that a bus would not be able to do a circular route on the pylon side of Nine Acre Wood, as it stands in Phase 1. Fragmenting the wildlife corridor between Newberry Grove and Nine Acre would question the welfare of at least two protected species and cause considerable impact to other species. There is no mention of HERC's advice in ES vol 1 Chapter 1 Ecology 9.71.

4.



[REDACTED] During a meeting with Iceni, an ecologist linked to the Herts & Middx Badger Group suggested an orchard be implemented on the eastern side of Nine Acre Wood which would provide suitable foraging, protection and reduce future conflict between residents and badgers, but this was ignored. We suggested that a small part of development was removed from F8 and replaced by a meadow which would have resulted in a biodiversity net gain as well as providing foraging, protection and a reduction in future conflict, but this was also ignored.

5. It is with great concern to see in Iceni's Outline Construction Environmental Management Plan section 11.9 that the intention is to temporarily/partially close numerous setts during construction, [REDACTED]
[REDACTED] Where are Iceni/NHDC proposing the badgers go to? This vague remark needs to be qualified by a detailed plan that includes proposed timing and methods. This would cause a huge impact on the badgers in this area and we would class this as a welfare issue, unlawful and breach the Badger Act 1992.

6. [REDACTED]

7. We are concerned to see the designers have proposed an orchard on the opposite side of the site from where the largest amount of badger activity is - this would surely encourage mammals to cross through GA2, including crossing roads to access the proposed area which in ES Vol 1 Chapter 9 Ecology 9.231 states "Seasonal fruit will also be available in orchards proposed to the west and north west of the Site. On balance, the quantum of new higher-value badger foraging provided is anticipated to compensate for the loss of lower value arable forage at the Site." Again this questions the welfare of a protected species and makes no sense whatsoever. We have noted that the HYA supporting document 07012026 only actually shows one proposed orchard contrary to what is written in 9.231.
8. We have further concerns that a habitat creation is being proposed on the other side of the site next to a 50mph road, we believe this is so that a biodiversity net gain can be delivered and tick yet another box, but this seems hugely irresponsible and poorly planned and would put species at risk of rta's, as well as road users. We feel that the habitat creation has been proposed in this section possibly due to houses being unable to be put in due to access.
9. We have major concerns regarding buffers being impinged upon. The whole reason for the buffers to be implemented by the Herts & Middx Wildlife Trust into the local plan for such developments, was to protect the biodiversity and fauna and flora. This is clearly stated in policy NE4. Imposing on these buffers would remove even more foraging areas and protection. Natural England stated in their submission that a minimum of 15m buffers would need to be incorporated around ancient woodland -

we are shocked to see numerous impingements across the site, including that into the buffer that runs along the ancient woodland Brooches Wood. This not only contravenes policy NE4, but is against advice by Natural England. We note that in ES Vol 1 Chapter 9 Ecology, that 9.291 states “scheme incorporates extensive embedded and additional mitigation, such as ancient woodland buffers” – this is not the case!

10. Not only would GA2 as it currently stands impact heavily on both badgers and bats, both a protected species – if this site does go through and is not dealt with sympathetically, there will be controversy between any new residents and the wildlife that have been inhabiting the area for decades and decades. We have seen firsthand how badgers have impacted upon residents by tunnelling and digging up gardens, building setts under conservatories and this has resulted in major conflict which again would question the welfare of this protected species, not just during build – but after. If the site goes ahead, it needs to be with biodiversity as a priority over profit.
11. There are several species of bats recorded in the area of GA2, including the rare barbastelle and myotis species. Even with ‘hop over’ mitigation and low level lighting, studies have evidenced the impact on bats and their decline. GA2 would impact flight lines, foraging and possible roosting.
12. There are a large number of different species of birds reported in the GA2 area including 11 species that are currently on the red list; such as skylarks, yellow hammers and yellow wagtails. GA2 would hugely impact on these even with mitigation put in place and this simply cannot be ignored.

We have repeatedly asked for ourselves and the Herts & Middx Badger Group to be identified as key stakeholders due to the seriousness of this site and the large badger populations, to look at the issues and to see if there is a way forward. We did attend a meeting with Iceni and numerous things were discussed and numerous ideas were put forward by HMBC and HWM, but unfortunately we feel this was just a tick box exercise as the major concerns and issues have not been dealt with.

The fragmentation of wildlife corridors is unacceptable, impingement in important buffers is a major concern and woodland mitigation appears to be insufficient. Submitted documentation shows moderate adverse effects on all woodlands including Brooches Wood (ancient woodland), mature hedgelines, bats, birds and contrary to what has been stipulated – we also believe the badgers (impacts on both foraging, dispersal, reduced sett digging opportunities as well as conflict with residents). A short series of principles of how to move forwards together (developer/LPA/local people) with adequate involvement of local groups concerned with wildlife protection was provided to the developer’s consultant in May 2025, but there has been no feedback whatsoever which has prevented meaningful collaboration.

Whilst we feel CSA have been very detailed with their report and are pleased to see proposals for bee bricks, hedgehog holes and other initiatives; we ask this application be refused until the serious biodiversity concerns are discussed and dealt with as a priority. This site should never have been agreed, issues should have been taken into account back in 2015 and now there is a need for biodiversity and current residents/future residents to be put as priority over profit!

N Hamilton
On behalf of Herts Wildlife Monitors