

LIKELY EFFECT ON THERFIELD HEATH SSSI BY PLANNING APPLICATION 25/01708/OP

This report is sent in objection to the planning application reference 25/01708/OP submitted to North Herts District Council while also offering an alternative use of the land subject to the application. The application should be refused for the reasons given in this report.

PRELIMINARY NOTE

An essentially identical report was sent in objection to the previous failed application (reference 20/00744/OP). Copies were also sent to Natural England, Herts and Middlesex Wildlife Trust, Herts County Council Ecology Department and the Conservators of Therfield Heath, all of whom recognised the merit of the proposal in principle.

BODY OF THE REPORT 'LIKELY EFFECT ON THERFIELD HEATH SSSI BY PLANNING APPLICATION'

1 SUMMARY.

This report describes how the proposed application to North Herts District Council, reference 20/00744/OP, to develop land belonging to Heath Farm, presents a clear danger to the biodiversity of Therfield Heath SSI and nature reserve and should therefore be refused for the reasons given below. Furthermore the land, along with the field between it and the SSSI, presents a wonderful opportunity to expand the SSSI in accordance with the Hertfordshire Biodiversity Action Plan.

- Developing the land will further isolate the SSSI which is against current desire to reduce the isolation of reserves (Section 2)
- There will be a direct loss of biodiversity on the development site and potentially on Therfield Heath SSSI and nature reserve (Section 3 and 4)
- There will be increased disturbance to and addition of predators to wildlife on the SSSI and nature reserve (Section 4)
- The land provides an excellent opportunity to form part of an expansion of the highly important chalk grassland Therfield Heath SSSI, which would help fulfil the requirements of the Hertfordshire Biodiversity Action Plan (Sections 2 and 5), an opportunity which would be lost forever if the application were to be approved.

2 SHORTAGE OF AND THREATS TO CHALK GRASSLANDS

Therfield Heath is a tiny remaining fragment of what was once a large swathe of chalk grassland across North Hertfordshire and South Cambridgeshire, stretching from Royston to Baldock. It is a nature reserve but also, as it is so important as a chalk grassland site, *it has been awarded SSSI status and is listed as UN protected*. It is bounded by the A505 to the North, Royston Town to the East and agricultural farmland to the South and West. It is split by a reasonably busy road going North to South. Until recently there was a strip of farmland to the North of the heath which, although separated from the Heath by another busier road, did provide some refuge for wildlife. This farmland has now either been fully developed or is currently under development.

The Heath has enormous pressure upon it due to human use, including sports (golf, rugby, hockey, running and tennis) and walking, including substantially with dogs which are frequently left unleashed and run through vital areas of the Heath. Dog excrement, being rich in nutrients, is frequently left and presents a further challenge to the SSSI which depends upon low nutrient content.

Very close to the SSSI and to the South East lies a parcel of land that is under the threat of development due to a planning application for up to 84 houses. This land, consisting of two fields, is to the South East of the Heath and is not separated from it by any roads, only a bridleway and another small field. This land and the gardens adjacent to it have been demonstrated to have very large biodiversity including [REDACTED] frequent use by Brown Hares, Hedgehogs, Foxes and deer, 66 bird species (including 10 red listed species) and numerous invertebrates as well as common lizards, small mammals and amphibians (see Section 3).

The Conservators of the Heath strive very hard to preserve the balance between wildlife and recreational use and can certainly do without the extra pressure that this proposed development will certainly produce.

The government sanctioned report 'Making Space for Nature: A review of England's wildlife sites and ecological network', commonly known as The Lawton Report, highlights the importance of connectivity in nature and states that 'isolation of wildlife reserves is a direct threat to biodiversity'. The proximity of the land proposed for development to the SSSI renders it a valuable refuge for, and source of regeneration for, biodiversity on the SSSI and nature reserve.

This is further supported by The Biodiversity Action Plan for Hertfordshire which states (Chapter 8) 'Protection and appropriate management of the remaining unimproved chalk grassland sites, no matter how small, is an urgent priority'.

<https://www.north-herts.gov.uk/sites/default/files/ORD4%20Hertfordshire%20Biodiversity%20Action%20Plan.pdf>

That plan also acknowledges that there is a shortage of chalk grassland sites and that isolation is a problem. It states 'Appropriate management on existing sites is unlikely to be sufficient to maintain the conservation value of chalk grasslands in the county. The extremely small and fragmented nature of many of the remaining sites, greatly increases the risks of localised species extinctions. **There is therefore a need to restore areas of former unimproved chalk grassland which are now either covered in scrub or have been partially improved for agriculture, through the use of fertilisers.**' (emphasis is as in the report)

In addition to the immediate loss of biodiversity in developing the fields forming the wildlife haven that is subject to the planning application, it is also clearly a direct threat to the biodiversity of the ever increasingly isolated Therfield Heath SSSI and thus should not be considered suitable land for development and the application refused. It could, however, as discussed in 'Section 4 Alternatives' be considered for conversion back to chalk grassland to provide welcome support to Therfield Heath SSSI.

It should also be noted that the threat to the SSSI from interference with Bridleway 13 provides a direct threat to the SSSI. This was described by the Conservators of Therfield Heath in objection to the previous applications and will therefore not be repeated here.

There will inevitably be increased visitor pressure on Therfield Heath SSSI as, being so close to the SSSI, means that greenspace provision on site simply won't be effective. The council's mitigation strategy references SANG (suitable alternative natural greenspace), but fails to note that for Thames Basin Heaths, for which SANG were originally devised, no new homes were allowed within 400m of any of the constituent SSSIs, because new residents would simply walk to the inevitably more attractive SSSI than to any on-site greenspace. The sheer size of Therfield Heath, which is indeed closer than 400 meters, would be a major draw.

3 WILDLIFE

Therfield Heath SSSI and nature reserve is supportive of a large biodiversity including many species of bird, being of particular importance to the red listed Skylark, and an important migration staging post for birds such as Wheatear and Ring Ouzel. It has England's largest population of Pasque flowers and a variety of other rare flowers. A large population of small mammals is supported and there is a good population of common lizards. It is also very important for the Chalkhill Blue butterfly and its food sources, Knapweeds, Scabious and Horseshoe Vetch, the latter being the sole food for its larva

The Hertfordshire biodiversity plan states specifically about chalk grasslands: 'A second and more insidious threat is that many rare species are in danger of local extinction due to the small number of sites on which they occur, the isolation of most of these remaining sites and the small size of remaining populations. If a species is lost from a site there is often no nearby population to provide a source for recolonisation'.

The fields under threat of development could form an excellent refuge to support such recolonisation. On or over this land have been recorded, by expert naturalists, 66 species of birds, of which 10 are red listed, including Skylark. A survey found a vast diversity of invertebrates in Bridleways 13 and 14 (access to the fields was not granted) with 380, of which 30 are species of national importance, found in Bridleway 14 alone. Also recorded are 19 species of butterflies, 16 species of mammals, including [REDACTED] frequent fox, brown hare and hedgehogs and numerous species of wild flowers, including as previously mentioned the food plants of the Chalk Hill Blue butterfly.

The applicant's own ecology report admits that the development would lead to a local decrease in biodiversity, rather than an increase as required by planning laws. Clearly, in addition to rejecting the immediate loss of biodiversity on the site itself, the SSSI should not be forced to lose such a close link to this wonderful reservoir of biodiversity, going against the Making Space for Nature and Hertfordshire Biodiversity report recommendations.

Thus there is a strong imperative to reject the application because of the risk of a reduction in biodiversity both of the site itself and potentially on Therfield Heath SSSI and nature reserve.

Note that detailed reports on the wildlife mentioned above are available upon request.

4 DISTURBANCE

Therfield Heath SSSI is open to the public and so has to contend with enormous human disturbance. People walk and run around the Heath, often with dogs not on leads. Even docile dogs, with their strong sense of smell, could potentially disturb ground nesting birds such as the red listed Skylark and Meadow Pipit. The recent and ongoing addition of some 600 houses to the immediate north is bringing further extra pressure from the larger number of human users of the Heath along with their dogs. What is often overlooked is the enormous predation from domestic cats.

A significant part of the Heath is covered by a golf course, Rugby pitch, hockey pitch, tennis courts and a leisure facility (gym and café) which brings yet further disturbance while also reducing suitable available habitat.

It can thus be seen that Therfield heath SSSI is already under enormous pressure.

The development of the fields nearby, with addition of up to 84 houses, will exacerbate this pressure with increased interference from humans, dogs and cats. It can be expected that the proposed development will, using published figures for domestic cat and dog populations in England, bring around an extra 37 cats and 38 dogs. Whilst it is acknowledged that most domestic cats will not range as far as the SSSI, they will be in easy reach of Sun Hill common (part of Therfield Heath nature reserves. Wildlife roaming from the SSSI will be at severe risk from the cats and dogs. The SSSI will also suffer massively increased disturbance from humans and dogs. As previously mentioned, dog excrement is a threat to chalk grasslands.

Consulting ecologists Greenwillow, stated in their expert report for the previous application that, being so close to the SSSI, means that greenspace provision on site simply won't be effective. SANG (suitable alternative natural greenspace), devised for the Thames Basin Heaths, allows no new homes were allowed within 400m of any of the constituent SSSIs, because new residents would simply walk to the inevitably more attractive SSSI than to any on-site greenspace. The sheer size of Therfield Heath would be a major draw.

It has been demonstrated that the planning application is a clear and present threat to the biodiversity of the site itself and to Therfield Heath SSSI. The application should therefore be rejected without reservation.

5 ALTERNATIVE TO THE PLANNING APPLICATION

The Hertfordshire Biodiversity Report, when discussing how to expand and protect our current chalk grasslands, states:

'Other opportunities include the creation of a series of new chalk grassland sites linked to the A505 corridor (my emphasis) and other road verges in north Herts and the widespread adoption of unploughed grassy field margins to provide valuable links between grassland sites in mainly arable areas. Bridleways and footpaths may also provide links in some areas.'

The report also *specifically mentions Therfield Heath SSSI as a chalk grassland site that should be expanded.*

The current owner of the land the subject of the application has indicated that he does not wish to continue farming the land. This could therefore provide an ideal opportunity to

contribute to this requirement and both cement its value for biodiversity and also provide an expansion of Therfield Heath. Were this land to be returned to chalk grassland it could be a part of an expanded Therfield Heath SSSI which could be kept largely free of human disturbance to further enhance its value.

The report also mentions that maintaining grazing, which is the preferred method for preventing encroachment by detrimental species on chalk grassland, can be problematic. Indeed that is so on Therfield Heath SSSI because of the necessity for temporary fencing to hold the sheep. This is time consuming and labour intensive to erect and is all too easily breached by human and dog disturbance (there have been examples of sheep being deliberately freed). The land proposed for development could easily be grazed as it is ideal for containing the grazing animals. This use of the fields could be subsidised, as has already been happening under the set aside scheme, but with the objective to try and return the site to chalk grassland.

The farmer holding the grazing rights to the Heath, but who doesn't graze because of the pressures mentioned above, fully supports this proposal and would be prepared to graze this land. It should also be considered that the field between the proposed development land and Therfield Heath would also provide a significant contribution to the enhancement of the Heath. Should the land be developed, this great opportunity would be lost forever and such land will be incredibly difficult to find

It is therefore proposed that the planning application for the fields should be rejected and serious efforts made to include them, and the field separating them from the SSSI, into part of the SSSI as regenerated chalk grassland.

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