

Prepared by:

Denis J Vickers CBiol, MRSB, MCIEEM

On behalf of:

Great Ashby Community Council

Correspondence Address:

Great Ashby Community Centre

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Great Ashby

Stevenage SG1 6NH

9th March 2026

Planning Department

North Hertfordshire District Council

**RE: Planning Application 25/03080/HYA — Land North of Great Ashby,
Stevenage — Objection on behalf of Great Ashby Community Council**

Dear Sir or Madam,

I write on behalf of Great Ashby Community Council to lodge a formal objection to the above application for a hybrid residential-led development of up to 640 dwellings, a primary school site and associated infrastructure on land north of Great Ashby (the GA2 allocation).

A detailed technical objection document accompanies this letter, setting out seven grounds of objection with full supporting analysis and references. This letter summarises those grounds in plain terms for the case officer's convenience.

The objection has been prepared by ecologist Denis J Vickers, a Full Member of the Chartered Institute of Ecology and Environmental Management (MCIEEM) with nearly 40 years' experience in ecology and nature conservation, including specialist expertise in ancient woodland. Denis holds a BSc (Hons) in Ecology and is also a Chartered Biologist (CBiol), and Member of the Royal Society of Biology (MRSB). He has recently scrutinised similar development proposals for local authorities in London and served on the Sites of Importance for Nature Conservation (SINC) review scrutiny panel for the Greater London Authority (GLA).

Summary of Grounds of Objection

1. Badgers – [REDACTED] (Individually Fatal)

Independent evidence from Dr Jenny Jones MCIEEM and the Herts & Middlesex Badger Group [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

Natural England cannot license the destruction of a main sett unless the applicant demonstrates that no satisfactory alternative exists and that the badger population will remain viable — tests the ES does not meet. Because the access road is the only element seeking full permission in this hybrid application, determining it before this licensing issue is resolved creates an unacceptable circular dependency: planning permission cannot responsibly be granted until the sett is correctly identified and its status resolved, yet a licence cannot be issued until permission is in place. The LPA must therefore require the applicant to resolve this contradiction before determination.

2. Ancient Woodland – Buffers Too Narrow and Undeliverable

The scheme adopts the minimum 15m buffer, contrary to Woodland Trust recommending 50m+ and NE guidance for developments of this scale. The applicant's own Ancient Woodland Assessment confirms the buffer cannot be maintained along the access corridor due to National Grid stand-off zones. This is a permanent constraint, not a design issue, and affects Local Wildlife Site woodland. NE further identifies currently absent documents including a woodland recreational management plan. The ES does not assess ash dieback, SuDS proximity, or long-term management viability.

3. Bats – Unresolved Roost Risk and Unproven Connectivity Measures

Multiple species including barbastelle were recorded historically. Twelve hedgerow trees with moderate/high roost potential were never subject to climbing inspection or emergence surveys, and woodland trees were not assessed at all. The ES proposes pre-commencement surveys despite these gaps being known since 2017. Proposed “hop-overs” lack evidence of effectiveness and no monitoring commitments are included.

4. Nitrogen Deposition – All Ancient Woodland Receptors Already Exceeded

The applicant's air quality appendix confirms all 13 woodland receptors already exceed critical nitrogen loads by 134–272%. Even small additional increments risk deterioration of irreplaceable habitats. The ES relies solely on the Environment Agency (EA) permit-screening threshold and does not apply the National Planning Policy Framework (NPPF) deterioration test. ES Chapter 9 contains no nitrogen analysis at all.

5. Open Space – Quantum Not Benchmarked; NE Requirements Not Secured

Only 6.73ha of accessible amenity green space is provided for ~1,500 residents, below Fields in Trust standards. Most of the headline open space figure consists of constrained semi-natural habitats. NE's requirements—2.3km circular walk, dog-related infrastructure, signage and management in perpetuity—are not secured via S106.

6. Hazel Dormouse – Connectivity Effects Not Assessed

While 2023 surveys indicate likely absence, the ES does not assess landscape-scale connectivity impacts of removing key hedgerows linking woodland parcels. Dormouse

movement depends on continuous woody corridors, several proposed removals risk severance.

7. Biodiversity Net Gain – Claimed 25.9% Gain Structurally Unsound

The BNG surplus relies heavily on counting 6.02ha of ancient-woodland buffer scrub as “habitat creation”, even though this is required mitigation, not optional enhancement. If treated correctly, the scheme risks falling below the statutory 10%. No bespoke compensation is provided for five irreplaceable ancient woodland parcels. The Habitat Management & Monitoring Plan is largely incomplete (funding, management body, species lists, risk register all “TBC”) and no S106 has been submitted despite the HMMP stating one is required.

Conclusion

[REDACTED]

[REDACTED] The ES contains significant omissions regarding ancient woodland buffers, nitrogen impacts, bat roost risk, open space standards, dormouse connectivity and biodiversity net gain deliverability. On the evidence available, the LPA cannot be satisfied that significant harm to protected species and irreplaceable habitats can be avoided, mitigated or compensated. The application should therefore be refused or further information requested under EIA Regulation 25.

Our Request

We respectfully submit that the application should not be determined until the outstanding information identified across these seven grounds has been provided and assessed. In the event that the Council is minded to grant permission notwithstanding these objections, we request that the detailed technical objection document be placed before the planning committee in full.

Grounds 1, 2 and 7 are, in our submission, individually sufficient to justify refusal or deferral. The remaining grounds reinforce a pattern of inadequate information and unresolved mitigation that cumulatively undermines confidence in the application as submitted.

Yours faithfully,

Denis J Vickers CBiol, MRSB, MCIEEM

Consultant Ecologist/Chartered Biologist

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[REDACTED]

On behalf of Great Ashby Community Council