



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.

To whom it may concern

Badger Trust submits a formal objection to the proposed development in its current form due to the significant impacts it would have on multiple established badger social groups and the fragmentation of key ecological corridors linking woodland habitats across the site.

Badger Trust exists to promote and enhance the welfare, conservation and protection of badgers, their setts, and their habitats. We are the leading voice for badgers in England and Wales, with a network of around 53 affiliated local voluntary badger groups.

The Environmental Statement accompanying the application confirms that the site supports extensive badger activity including multiple active setts, subsidiary and outlier setts, and widespread evidence of foraging and commuting across farmland, woodland and hedgerow habitats.

Surveys undertaken in 2023 recorded 22 badger setts across the site, including three main active setts, along with numerous field signs such as:

- badger latrines
- mammal pathways
- badger hairs
- exploratory digging
- snuffle holes.

Badger activity was recorded throughout much of the site and particularly concentrated within and around:

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

While the GA2 site has been identified within the Local Plan for development, the current design and layout fail to adequately avoid harm to protected species or maintain ecological connectivity.

Badger Trust therefore considers that the application cannot currently demonstrate compliance with protected species legislation or biodiversity planning policy requirements, including the National Planning Policy Framework and North Hertfordshire Local Plan biodiversity policies.

In addition, the current proposals are likely to have a detrimental effect on the local badger social groups using the site.

Legal protection of badgers

Badgers and their setts are protected under the Protection of Badgers Act 1992.

It 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.

Natural England standing advice and established planning practice require that sufficient ecological information is provided prior to determination of a planning application so that impacts on protected species can be properly assessed.

The mitigation hierarchy requires developers to:

1. Avoidance
2. Mitigation
3. Compensation
4. Enhancement

The current proposals do not demonstrate that impacts on badgers have been adequately avoided.

Importance of the site for badgers

Survey data within the Environmental Statement confirms that the site supports a substantial and active badger population.

The identification of 22 setts including three active main setts and numerous subsidiary and outlier setts indicates the presence of a well-established badger territory. Badger activity was found across the wider landscape and particularly associated with woodland habitats and dense vegetation.

The development area therefore forms part of a larger badger territory spanning several woodland blocks and agricultural fields between them.

The Environmental Statement acknowledges that development may result in:

- loss of foraging habitat
- reduced dispersal opportunities
- reduced opportunities for sett excavation.

However, the current development layout does not adequately address these risks and impacts.

Loss of badger foraging habitat

The ecological appraisal has classified much of the site as “low distinctiveness arable land” within the biodiversity metric, however this classification does not reflect its ecological importance for badgers.

Badgers rely heavily on farmland, pasture and hedgerow margins for foraging and sett building as well as green corridors for safe movement.

The proposed development would remove large areas of farmland currently used by badgers for foraging, significantly reducing the available feeding territory.

No meaningful replacement habitat of equivalent value has been proposed.

The removal of extensive foraging habitat may lead to:

- increased competition between badger clans
- displacement into neighbouring territories
- increased likelihood of badgers foraging within residential areas.
- Increased road death mortality

Fragmentation of wildlife corridors

The site forms part of a wider ecological network linking several woodland habitats including:

- Brooches Wood
- New Spring Wood
- Longdell Wood
- Nine Acre Spring
- Newberry Grove.

These woodland blocks are connected by farmland, hedgerows and field margins that function as wildlife corridors.



The proposed development introduces roads and housing across several of these corridors, fragmenting the ecological network and disrupting established wildlife movement patterns.

Wildlife tunnels and crossing structures

The development proposes some wildlife tunnels beneath roads. While such structures can provide mitigation, their effectiveness depends on their placement along established badger scent paths and integration with guiding fencing.

[REDACTED]

Without detailed mapping of badger movement patterns, these mitigation measures are likely to not function effectively.

Fragmentation of important corridor

The proposed road separating Nine Acre Spring Wood from Newberry Grove would sever an important wildlife corridor. This corridor currently provides connectivity between woodland habitats [REDACTED]

Introducing a road across this corridor would create a barrier to wildlife movement and increase the risk of road mortality. Alternative road layouts could allow development while maintaining this ecological connection.

Poorly located habitat creation proposals

There is also concern about the proposed location of the orchard within the development. The orchard appears to be located on the opposite side of the site from the areas where the highest levels of badger activity have been recorded, including the woodland habitats around Nine Acre Spring, Brooches Wood and Newberry Grove.

Locating a food-rich habitat such as an orchard away from the areas currently used by badgers for foraging may inadvertently encourage badgers to move across the development site to access this resource. This could increase the likelihood of badgers and other wildlife attempting to cross roads and developed areas within GA2, thereby increasing the risk of disturbance, habitat fragmentation and wildlife mortality.

The placement of new habitat features should be carefully aligned with existing wildlife movement patterns and ecological networks, rather than encouraging animals to cross areas of built development and road infrastructure.

We also note that an area of habitat creation appears to be proposed adjacent to a 50mph road in order to deliver biodiversity net gain. Locating new wildlife habitat in such close proximity to a high-speed road raises significant concerns regarding wildlife safety and long-term ecological functionality.

Habitat creation areas should provide safe and suitable habitat for wildlife. Locating such areas adjacent to a high-speed road may expose wildlife to increased mortality risk and does not represent good ecological design. It also raises questions as to whether this area has been selected primarily because it is unsuitable for development rather than because it is ecologically appropriate.

Biodiversity Net Gain should deliver ecologically meaningful and functional habitat improvements, and locating habitat creation in areas where wildlife is likely to experience increased disturbance or mortality risk, risks undermining the intended purpose of biodiversity enhancement.

Disturbance and potential sett closures

The Environmental Statement indicates that some badger setts may be temporarily or permanently closed during construction. Given the presence of multiple active setts, including three main setts, this raises significant concerns.

The application does not clearly identify which setts may be affected or how closure would be undertaken, whether temporary or permanent. We would object to any closure of main setts either temporarily or permanently, as given they are within woodland primarily, there should be no reason at this stage to need to close them, when adequate re-design or avoidance measures can be taken.

At present the scheme does not demonstrate that avoidance has been prioritised.

Recreational disturbance

Much of the open space proposed within the development would be publicly accessible recreational land, increasing human activity and dog walking.

Increased recreational pressure near woodland habitats can result in:

- disturbance of badger setts
- criminal activity around setts
- anti social behavior around setts cursing mange and disturbance
- risk of dogs going into setts
- soil compaction & vegetation damage.

Such impacts are particularly concerning where woodland habitats containing badger setts become surrounded by housing with inadequate buffers or connective corridors.

Inadequate analysis of badger territories

Although numerous badger setts were recorded, there is no evidence that a bait marking survey or equivalent territorial mapping exercise has been undertaken and on a site this size with ecological significance, this is essential to understand.

Bait marking is the recognised method used to determine:

- badger clan territories
- movement routes
- core foraging areas.

Without such analysis it is not possible to determine how badger territories extend across the site or how development may affect territorial cohesion and movement. Mitigation measures such as wildlife tunnels therefore appear to have been designed without robust evidence of badger movement patterns.

Biodiversity planning policy

The proposals seem to conflict with key planning policies including:

- North Hertfordshire Local Plan Policy SP12 – Green Infrastructure, Landscape and Biodiversity, which requires protection of ecological networks
- Policy NE1 – Strategic Green Infrastructure, which seeks to maintain landscape connectivity

- Policy NE4 – Biodiversity and Geological Sites, which requires protection of protected species

The scheme also conflicts with the National Planning Policy Framework, which requires development to:

- minimise impacts on biodiversity
- provide net gains for biodiversity
- protect irreplaceable habitats such as ancient woodland.

Planning authorities must have sufficient information on protected species impacts before determining an application, and it would be inappropriate to defer critical ecological matters to a later stage.

Under Section 40 of the Natural Environment and Rural Communities Act 2006, the Local Planning Authority has a statutory duty to have regard to the purpose of conserving biodiversity when exercising its planning functions.

The site forms part of a functioning ecological network linking several woodland (including ancient) habitats within the wider landscape. The farmland and hedgerow corridors between these woodland blocks provide essential connectivity for badgers and other wildlife species and the space provides primary foraging resources. Fragmentation of these through road infrastructure and housing development risks isolating wildlife populations and undermining the long-term viability of the local badger population. Maintaining ecological connectivity and habitat should therefore be a fundamental design principle for any development proposed at this location.

Risk of future resident–badger conflict

Experience across the UK demonstrates that developments constructed within established badger territories frequently lead to conflict between residents and wildlife where adequate habitat is not retained.

Badgers displaced from traditional foraging areas may:

- dig in gardens
- establish setts beneath buildings
- forage within landscaped areas (Play areas and POS).

This can lead to concerns among residents and requests for badger removal, which is legally complex and often difficult to achieve.

The current proposals remove large areas of badger foraging habitat while surrounding woodland setts with housing, significantly increasing the likelihood of such conflicts.

Strategic importance of the woodland network

The site lies within a landscape containing several woodland habitats including:

- New Spring Wood
- Longdell Wood
- Nine Acre Spring
- Brooches Wood

- Newberry Grove.

Several of these habitats are ancient woodland, recognised in national planning policy as irreplaceable habitat.

The farmland and hedgerows between these woodland blocks provide important ecological connectivity for wildlife including badgers, bats and other species.

Fragmentation of this network would undermine its ecological function.

Design modifications to reduce impacts

Badger Trust considers that the development could potentially be redesigned to significantly reduce ecological harm.

Potential improvements include:

- retaining the wildlife corridor between Nine Acre Spring and Newberry Grove
- protecting the hedgerow corridor west of Longdell Wood
- relocating development away from woodland edges
- placing wildlife tunnels only where informed by detailed badger movement mapping
- creating areas of species-rich grassland or orchard habitat close to woodland setts.
- Reducing scale of development

Recommended planning conditions (If permission were granted)

Whilst we believe that there is not sufficient avoidance and mitigation, nor information gathered for this important site to give planning permission at this stage. If the Local Planning Authority were minded to grant planning permission, the following safeguards should be secured:

- territorial mapping or bait marking surveys
- updated badger surveys prior to commencement
- a Badger Protection and Mitigation Plan
- protection buffers around badger setts and woodland edges (minimum 30m)
- wildlife crossing structures along established badger routes
- Protection of important hedgerow corridors
- a Landscape and Ecological Management Plan
- a sensitive lighting strategy.

These measures represent the minimum safeguards necessary to protect the badger population.

Conclusion

Badger Trust recognises the need for housing development but considers that the current design of the GA2 proposals represents an overdevelopment of a site of significant ecological importance and results in unnecessary and avoidable ecological harm. Therefore Badger Trust objects to the proposed development in its current form.

The scheme would remove extensive badger foraging habitat, fragment long-established wildlife corridors and risk disturbance to numerous badger setts and multiple social groups. It would also undermine ecological connectivity between woodland habitats within the wider landscape.



The application therefore fails to demonstrate compliance with:

- the Protection of Badgers Act 1992
- the National Planning Policy Framework
- North Hertfordshire Local Plan biodiversity policies.

Therefore until the development is fundamentally redesigned to retain wildlife corridors, protect badger territories, preserve or replace primary and secondary foraging habitat and maintain ecological connectivity between woodland habitats, the Local Planning Authority should refuse the application.

Please do not hesitate to contact me should you have any queries.

Kind Regards



Sally Jones
Groups Manager
Badger Trust