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Contact: Martin Hicks
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Date: 31/05/2025

Dear Sarah

Application: Variation of condition 1 (revised plans) of planning permission 17/02627/1 granted 30.05.2018 for Application for approval of reserved matters comprising of access, landscaping, layout, scale and appearance of Phase 1 the development (pursuant to Outline application 14/02485/1 granted 07/12/2016) as amended by plans received on 22 December 2017; 30 January 2018; 27 March 2018; 18 April 2018; and 02 May 2018.

Address: Land East Of Garden Walk And North Of Newmarket Road Garden Walk
Royston Hertfordshire

Application No: 24/02656/S73

ECOLOGICAL IMPLICATIONS

Thank you for consulting this office on the above application and the information you have provided on the issue.

Overall Recommendation:

- ☒ No in-principle objection, but the application requires further details to ensure appropriate ecological restoration and monitoring is achieved.

Comments:

1. Further to my previous comments, I have considered the amended plans and documents. The Community Open Space will, by default, compromise biodiversity given it will be disturbed, subject to trampling and dog fouling depending on the extent, manner and pressure of its use. Whether any chalk grassland will survive and its quality or associated wildlife will be a function of its creation, management and levels of informal use. However, there are no objections to this; the site was previously arable and allocated for development. Planning permission was not subject to mandatory Biodiversity Net Gain or latest policy provisions regarding BNG.

2. The issue raised previously was obviously not related to any impacts on existing habitats, but the likely impacts on the proposed habitats claimed to be created, and consequently their successful establishment and maintenance. Whilst this can only remain a concern, for the reasons outlined above there are no objections to the principle of the proposals. Successful chalk grassland creation on this site is not subject to planning law as it would be now if this Community Open Space was proposed and so required to provide BNG.

3. The proposed paths around the site are considered to be consistent with the previous paths around the arable field and it is claimed in the planning statement this will therefore limit impacts on potential ecology. Whilst this is welcome and may indeed limit disturbance, clearly this comparison is irrelevant. The previous land use was arable on private farmland on which there was no legal access; now it will be a recognised multi-use area of public open space where access anywhere will be available as a function of that use.

4. I have considered the Open Space and Infrastructure Soft Landscape Management and Maintenance Plan (May 2025) and can comment as follows:

4.1 The objectives regarding habitat and chalk grassland creation are supported;

4.2 There will be ecological monitoring of the existing and proposed habitats.

4.3 Boundary grasslands are to be managed by appropriate cutting and removal of arisings.

4.4 The plan states the proposed chalk grassland area was formerly chalk grassland prior to cultivation (11.3). There is no evidence that this habitat survived on this site in recent history given all of the adjacent land to the north-east on similar topography was and still is, arable, along with the field which remained arable after the by-pass was created which isolated the field. It was still arable in 2016; recent abandonment may have enabled a grassland of some sort to have developed, but this would not have been ancient chalk grassland.

4.5 Given the intensive arable use, the proposals to reduce fertility (11.3) are welcome, although these may now be history given it has been several years since this was originally written in 2017. However, the existing vegetation should be removed to avoid nutrient enrichment, unless some of it has generated a calcareous character as has been suggested (by others) previously, in which case the scraping of such areas and re-spreading of topsoil may be appropriate (11.4). However, I have no personal knowledge as to whether any such vegetation exists or its quality; it is only appropriate if a reasonable chalk community has developed and given the previous land use, this may not be the case as there may be no buried seed bank of any value. However, if the vegetation is reasonable, this approach should be advised by an ecologist to ensure no ruderal seed bank is included in any stored material. Aerial photos do not suggest the field is currently arable – as stated (11.4) – indeed it appears largely ruderal. If the vegetation is of only limited value, it would be best to avoid this approach and start from scratch, as outlined (11.5). Both approaches are

valid, depending on the circumstances. The species-mix suggested in 11.5 is acceptable but this should be confirmed if it is to be used.

4.6 Grassland establishment is outlined and subsequent management, consistent with seed suppliers recommendations.

4.7 Proposals to retain 25% unmown areas (11.12) are supported. The potential for hay cropping is also supported (11.13), although the figures given for productivity are unlikely to be accurate for chalk grassland on what will become nutrient poor soils. Depositing arisings in heaps on the site should be avoided, unless one or two small heaps are made. The extent of cuttings could generate large heaps which will destroy grassland underneath, increase nutrient enrichment locally, and potentially be a fire hazard. Whilst the cuttings may be insufficient or incapable of being used for hay, leaving them on site should not be an option unless they are very limited, as outlined.

4.8 Mown paths are supported, although desire lines are likely to become established.

4.9 The Maintenance Schedules (12) are largely acceptable. However, I do not support the autumn cut for chalk grassland (12. Annual); there is unlikely to be much regrowth after the main summer cut and what regrowth there is should be retained for biodiversity. Also there may be insufficient material to be easily lifted. It should not be vigorous at this time and would be cut with the early spring cut. Monitoring of the sward would provide further advice on this once it becomes established.

4.10 There is currently no expectation that the LPA will be provided with monitoring reports of the success of the chalk grassland creation. I consider this should be included to:

- Demonstrate that management and monitoring is being undertaken as proposed;
- Enable an assessment of its success;
- Enable any modifications of the plan to be made.

4.11 I note that 11.11 states and that a site specific long-term management plan is required, drawn up by a suitably qualified ecologist which will include a monitoring and evaluation programme which will enable the management regime to be adapted as necessary. I support this – however, surely isn't this the purpose of this plan? However, currently, the need to do this, or to provide the LPA with a suitable monitoring report and any recommendations, is not included within this plan. I consider it should be, so that this would enable this plan to be used without yet another plan.

5. Consequently, in respect of the issues I have raised above, prior to approval I consider this plan should be amended as follows to avoid the need for another plan to say much the same:

1. Expert guidance on the need to retain any existing vegetation / seed bank to support grassland creation.
2. Removal of references to historic chalk grassland on this site, for clarification.

3. Clear recommendations as to which seed mix is to be used. This would help in assessing future success – although it is acknowledged that not all proposed species are likely to survive.
4. Removal of the autumn cut, unless monitoring shows this is necessary.
5. Removal of option to leave cuttings on site in piles, unless very restricted amounts.
6. Inclusion of monitoring reports to LPA in Y1 (has it been done), Y3 (has it survived) and Y5 (how is it doing). Longer term monitoring requirements (eg.Y10) would need to be considered by the LPA if they felt they were justified.
7. The Soft Landscaping Plans appropriate for the plan areas should be included in the plan or at least referenced; currently they are neither.

6. On the basis of the above, I have no objections to the amended proposals *on condition that the plan is amended as outlined above*. Without this, it should not be approved. The alternative is for another plan to be provided as recommended – but I am not aware the requirement for this has been secured as part of the approval (in the form of a LEMP or specific ecology management plan), in which case this would not be appropriate.

I trust these comments are of assistance,

Regards,

Martin Hicks MCIEEM
Senior Ecology Officer Hertfordshire LEADS

Hertfordshire LEADS provides Landscape, Ecology, Archaeology, Design and Sustainability support to planning departments in Hertfordshire.