

## **ID 15505 Ms. Nikki Hamilton: Herts Against the Badger Cull:**

Dear Mr Berkeley

Further to our original objection completed on 26/11/2017 and submitted to NHDC, we are writing to add further evidence to substantiate our concerns regarding the GA2 development area North of Stevenage.

In our objection of 26/11/2017 we stated that the plan, in regards to GA2 contravenes 109, Section 11 of the NPPF and we are still in agreement with our original reasoning behind this. We are in no doubt and from our experience, feel that continuing with this development will result in a definite loss of biodiversity. The GA2 area (and area East towards Box Wood) is undoubtedly one of the most important areas for the protected species of badger (and bats) around the whole of Stevenage and Great Ashby. We feel that the reason for this could be due to the fact that even though this area is one of agricultural fields, a number of these fields are small in comparison to those in other areas and they are intercepted by ancient woodlands, natural deciduous woodlands and priority habitat hedgerows that are of huge importance when it comes to connectivity. I am attaching Appendix 1 which shows Stevenage and Great Ashby - the areas highlighted in yellow depict larger fields and swathes of land that are not intercepted by tiny woodlands and priority hedgerows, the area highlighted in orange are the proposed developments and these along with the areas coloured in red show just how important this area is for the wildlife of Stevenage and Great Ashby. Other than areas around Old Knebworth, South East of Aston and South of Weston which also boasts small woodlands amid the many fields, although it must be noted that these areas do not have the surfeit of badger clans and setts that the GA2 area inhabits; the area North East of Stevenage (Great Ashby) is the last remaining pocket of green belt which is of such high value when it comes to connectivity and bio diversity. To even think that a development in this area would not seriously impact this is nothing short of ludicrous. I have also attached

Appendix 2 which depicts the importance of this area in regards to badgers, bats and hundreds of other species of mammals, birds and insects due to its landscape value of small fields intercepted by woodlands and hedgerows.

When we last carried out a survey on 24th December 2017, we found new holes and further badger activity to what we had previously submitted to NHDC consultation and HERC - Hertfordshire Environmental Record Centre. We now have 5 active setts within the GA2

area with a further 3 lots of outlying holes/satellite holes within the priority habitat hedgerows/banks connecting the woodlands. Holes can also be depicted within the adjoining field area between Newberry Grove and Nine Acre Wood. There are numerous runs/paths connecting the different setts within the different woodlands via the hedgerows and across the adjoining fields and an abundance of tunnelling and we have reported evidence of numerous foraging holes within the fields and a multitude of latrines along the hedgerows.

There is no possibility of moving these badgers South East of Newberry Grove as we have another clan inhabiting the area around Sheepleys Spring. We have a minimum of 3 large clans between the areas of Tile Kiln and Box Wood. The badgers cannot be moved South West of the area as urbanisation is already in place and they cannot be pushed North East as it is not suitable habitat. To go ahead with GA2 would not only incorporate a huge amount of investigation to define whether the badgers in this area are all part of the same clan (2 separate clans would need 2 separate artificial setts) but would incur an extortionate cost to put such an operation into place to move that amount of badgers and setts.

This confirms our concern regarding 117 of the NPPF, [promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan; and we are still greatly concerned that](#)

there are is no mention of the woodlands within the GA2 area - woodlands that are mixed deciduous and listed as priority habitat.

I also reiterate our concern that the local badger group did object originally to the smaller GA2 proposal (and that full records had already been submitted to HERC which NHDC could have accessed) but instead of considering our alternative approach for the area, they increased GA2 in size to include the very area so important to the badgers and many other species and obviously did not take into account the huge amount of complex bio diversity that inhabits GA2 that this development would impact upon.

As we have already observed in Hertfordshire, the impact of people on the woodlands would have serious impact on these species and the numerous substantial hedgerows connecting the various woodlands, an important connectivity feature, their value is likely to be eroded by the pressure of the development and the people living there. Development has already had a great impact on the badgers within the Stevenage and Great Ashby area. Setts that used to be flourishing within the town centre, Fairlands Valley Park, Martins Wood are now uninhabited due to persecution, lack of foraging and rta's from the numerous roads that have isolated the setts. The sett in Hangbois Wood is now also desolate, a once thriving sett on the edge of Stevenage became an isolated island when Great Ashby was built and Great Ashby Way was constructed within 10m of the sett - the heras fencing and other building materials can still be seen discarded all over the original sett. Another thriving sett was also impacted upon by NHDC when Ashby was built, the sett which was recorded with HERC in the area of Brooches Wood was partially destroyed when Cleveland Way was built within 10 feet of it. It has taken the badgers 10 years to fully return to this sett and GA2 would totally isolate this area.

We reiterate our concerns regarding NPPF 118 [When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:](#)

if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

The loss of habitat and the foraging area of a whole badger clan, which are the fields surrounding Nine Acre Wood would be considered as significant harm and this impact should be avoided. As we can see no solution as to how this area could be possibly mitigated, we would ask that the GA2 development is removed from the local plan in its entirety and planning permission refused. To continue with a development that would have such a huge impact on our wildlife would be criminal and see a huge loss to our complex bio diversity in the area.

We have been working closely with Wildlife Welfare of Stevenage who also have serious concerns regarding GA2 and other developments North of Stevenage and we attach their report for admission to the NHDC Examinations Library, a copy of their text is pasted at the bottom of our hearing statement for your perusal.

We have not changed our stance in relation to Ickleford or East of Luton. With regards to Ickleford there would need to be a full ecological report carried out and mitigation put in place and we would like to be kept advised in regards to the process. We strongly object to East of Luton as we feel this development would impact upon the badgers in the area and the many other species of wildlife that live there and we are aware that Luton Borough are looking to expand to the North and already have a new transport system in place and Bedfordshire Badgers Group are looking at working with Luton re mitigation.

We do have a concern with the newly submitted Chesfield Park representation that was observed in December 2017. This was not part of the original consultation process and as such, we have not been in contact with the land owners to survey the land in respect of the protected species and so are unable to comment on any impact. What does need to be advised is that the area of Chesfield Park along with the area to the West are currently used as a wildlife corridor between the land near Rooks Nest Farm (which is inhabited by badgers and other species) and the countryside to the North of Stevenage (East of Graveley). Should NS1 and a development such as Chesfield Park go ahead - the wildlife corridor would be removed in its entirety and the land around Rooks Nest

Farm totally isolated which would have a serious impact on the bio diversity in this area.

Thank you for your consideration in this matter.

Nikki J Hamilton  
HATBC

Copied from Report by Stevenage Wildlife Welfare:

As the wildlife rescue for Stevenage - we have serious concerns about the GA2 development that NHDC are proposing. This area is of high value when it comes to wildlife as the fields are joined by priority habitat hedgerows and deciduous woodlands that are home to hundreds of different species of mammals, birds and insects. We have a number of species of bats in the area North of Stevenage/ Ashby, throughout the GA2 proposed area all the way round to Box Wood including Pipistrelles, Serotines, Noctules; as well as Brown Long-eared bats and Natterers. All of these species can be found living and feeding in deciduous woodland. We have been called out on several occasions to rescue Natterer's Bats, caught by and brought home by the owner's cat. All these houses were located off Great Ashby Way, close to Box Wood and the GA2 area, an important feeding ground for this species. Bats will not fly across large open spaces; open fields pose a serious problem for them as they fall easy victims to hunting owls; they will instead use hedgerows as safe 'highways' to access their woodland feeding grounds. It's vital therefor that these hedgerow corridors remain in place, as without them, bat numbers will decline due to the lack of access to good feeding and hibernation sites.

Other species will also impacted upon if GA2 goes ahead as there will be an increase in pets including cats to the area - so we would likely see a large increase in injured/killed birds too. We received so many complaints regarding fallow deer in people's gardens when

they built Ashby and this had a negative effect on a great deal of our wildlife that resides in the area, a further development in an area so high in habitat value would be criminal. If GA2 goes ahead it will push our wildlife into crisis from which they will be unable to recover; some may NOT survive the change. It is not just the building of the development that will have an impact - it is the rta's, injuries from pets and persecution from people that have to be taken into account.

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<http://www.wildlifewelfare.org.uk>