HERTFORDSHIRE BIOLOGICAL RECORDS CENTRE
Environment, County Hall, Hertford, Herts, SG13 8DN

Planning Policy
North Herts District Council
District Council Offices
Gernon Road
Letchworth Garden City
SG6 3JF

Ask for: M. Hicks
Our Ref:
Your Ref:
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Date: 21/03/2013

Dear Sir

Local Plan 2011 – 2031
Housing Options Growth Levels and Locations 2011 – 2031
Consultation Paper February 2013

I would like to make the following comments on the above consultation:

1. Housing Options Part 1: Housing Numbers

1. There is no indication as to how many of the strategic Sites might be used, or whether it may be that parts of all of them may be released for development, although if new discrete communities are planned with minimum sizes for facilities etc. this may not be an option. It is suggested that at least one will be required to meet the target of 10,700 dwellings (1.46). However, if somewhat variable, this could obviously have an impact on the environmental implications of any development.

2. Currently, the increase in proposed homes represents an increase of over 20% of the existing resource; this will also – crudely - increase the resulting generic environmental pressures such as increasing transport, water demand, pollution and disturbance by 20%, overall within the District and locally where development takes place. This may result in direct impacts such as the lowering of water tables if over-abstraction occurs, as well as increased nitrogen deposition, although it is hoped that measures will be taken in an attempt to address these issues as part of more detailed planning.

2. Housing Options Part 2: Strategic Sites

2.1 South West of **Hitchin**

2.1.1 It is noted that this proposal site lies directly adjacent to Oughtonhead Common (2.8) and will abut the AONB (2.8). Consequently it will have potential ecological and landscape implications, although this will be dealt with by others.

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2.1.2 **Oughtonhead Common is a Wildlife Site (WS), Local Nature Reserve and part HMWT reserve.** It is important for wet marshy grassland and the river-head springs. This is a very important sensitive habitat which must be protected from adverse impacts, both direct and indirect. As such I would not wish to see any development west of Westmill, in the area that already forms an important buffer to the site. The existing development forms a good boundary to the settlement and further encroachment closer to the site will further increase the disturbance (which will be affected anyway) and management operations. Such an undeveloped area would be good Green Infrastructure (GI). The existing common is already present so cannot be 'provided' by any new development proposals, whilst the existing Oughtonhead Lane forms an acceptable boundary to the proposals, as already presented.

If the area between Westmill and Oughtonhead must have some development it should NOT be for the whole width and should not be uniform but of a sinuous edge nature to enable ecological and landscape GI benefits to be provided.

2.1.3. Part of **Oughtonhead Lane** south of Westmill is an **SSSI** for its geological interest and must be properly protected with sufficient buffer areas to protect the special interest.

2.1.4. The **Willows WS** adjacent to Willow Lane, Hitchin, is within the proposals area and should be protected with appropriate buffers.

2.1.5. A buffer could be proposed for Charlton. Parts of the site along the River Hiz and Ippolyts Brook fall within the flood plains (2.12) and this includes **Charlton Mill WS**. The whole of the river valley and source of the Hiz is also important, and MUST be protected from development as part of any GI provision. This should also enhance the valley floodplains. Locally good farmland bird communities are known (Temple End) and this should be another consideration within the approach to GI.

2.1.6 The area also includes part of the existing and former Priory Park. Any proposal should conserve what survives and consider re-establishing the historic parkland where possible, given that some landscape features still survive.

2.1.7 **Folly Alder Swamp WS** is also within this area. Again, the importance of this, associated with the Ippolyts Brook, floodplain and river valley habitat cannot be overstressed and should be protected and enhanced within any development.

2.1.8 There are also currently some adjacent species wildlife sites, and the area supports a range of other protected species such as water vole, badger and bats. These are largely – but not exclusively - associated with the river valley complexes, and will also be supported by smaller scale features within the landscape. **Priory Park icehouse** is important for bats although this is not within the proposals area.

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2.1.9 The general area used to support quite a number of orchards and it would therefore be appropriate to consider community orchard creation as part of any future GI provision.

2.1.10 On balance, given the provisions outlined above which I would consider are necessary to secure existing ecological interest and GI, I have no reason to believe there would be any fundamental ecological constraints associated with this proposal. There will be an impact on the existing farmland biodiversity although this is, of course, inevitable. Given the arable areas are intensively managed, the likelihood of significant harm is relatively low. However given the relative impact on known natural environment resources, the overall impact would be considered at moderate. If sufficient safeguarding provisions were not incorporated into any future development proposals, the potential could well be considered unacceptable.

2.2 North of **Letchworth**

2.2.1 This area does not support any statutory or non-statutory sites recognised for ecological importance. There are a number of local features that have been identified which border the site. Lizards and arable weeds have been recorded within the area and if still present, these would need to be taken into account in any detailed proposals. Great crested newts have also been recorded locally and may need to be similarly considered. Otherwise the area has been managed as intensive arable and is of limited ecological interest. Some remnant field patterns may support older hedgerow features.

2.2.2 On this basis, it would appear that there is little or no ecological constraint associated with this development proposal site. There is potential for GI depending upon the design layout, and this should include community orchard and allotment areas to ‘compensate’ in a small way for the loss of otherwise productive farmland.

3. East of **Luton**

2.3.1 This area contains no statutory or non-statutory ecological sites, although there are numerous large and small scale features that provide local ecological value that should be protected and incorporated as part of GI if the area was to be developed. A Wildlife Site is close by to the NE and a couple of historic orchards have been recorded from the area. No species of note are recorded on the HBRC database although this is most certainly a function of a lack of recording effort in this area, which will certainly support foraging bats. Other than woodland the land use is intensive arable, although there is a network of what are probably historic and remnant hedgerows.

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2.3.2 On the basis of this evidence, there would appear to be little if any ecological constraints to development, although the character of the countryside locally and the existing settlement pattern would be considerably affected. However major ecological features would be expected to be incorporated into any development as GI, and provision of allotments and a community orchard to reflect the loss of otherwise productive farmland. Ecologically this proposal is likely to have limited ecological constraints.

2.4. **Rush Green**

2.4.1 The proposal site is limited entirely to the highly disturbed scrap metal site of Rush Green. **Rush Green Airfield Wildlife Site** is almost directly adjacent to the north-west, but is unlikely to be directly affected. The area is within the range of local great crested newts and these may be present within the site given the remnant vegetation resources and potential cover, although little other semi-natural habitat is present. No other protected species interest is known to be present from the database. The site supports a scattering of mature trees and some could be retained in any development proposals.

2.4.2 This site has no recognised ecological interest and is unlikely to support biodiversity of any significance, although locally trees and GCN may be present. It therefore has no known ecological constraints and is of very low sensitivity. Potential GI could incorporate existing trees and develop community orchards to reflect the former farm within a sensitive development, although whether this could provide a new independent settlement or overcome other issues needs to be considered.

2.5. North of **Stevenage**

2.5.1 The whole site is managed as intensive arable with small areas of recent planting and grassland (for game?) with remnant hedgerows / boundary features. There are no known features or species of ecological importance other than a thin strip of **Ledgeside Plantation Wildlife Site** along the SW side of Back Lane. The remainder of **Ledge Side Plantation WS** is close on the north east side of the road and Chesfield Park lies to the east, which is more likely to represent landscape rather than ecological interest – although we have very limited habitat data from this site.

2.5.2 The WS and Parkland locally will be sensitive to disturbance from adjacent development if access is increased, but otherwise the site has no known ecological constraints other than the strip of WS – which should be protected and buffered if possible. Overall it is of little if any known ecological sensitivity. Clearly there will be a loss of arable farmland ecology but we have no data on this. Consequently there is currently nothing to suggest this is likely to be of such significance as to represent an ecological constraint. Again, GI would be expected to incorporate what historic remnant features remain, where

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possible, and provide for positive environmental engagement by the new community, such as creation of allotments and community orchard. I note the reference to a potential 'Forster Country Park' (2.73) to the south-east. Whilst this would be welcomed, its management is critical to delivery of anything meaningful other than sterile amenity land and this must be considered at the earliest possible stage.

2.6. North East of **Stevenage**

2.6.1 A large area of open countryside adjacent to developed areas of Stevenage. There are a number of Wildlife Sites within the area – all woodlands – **Harbourclose Wood**, **Claypits Wood**, **Tilekiln Wood and Parsonsgreen Wood**, **New Spring Wood**, with adjacent Wildlife Sites **Claypithills Spring Wood**, **The Warrren**, and **Stonesley Wood**. There are a couple of other woodlands on the database within the site as well as other small woods within and adjacent to the site. There are areas of grassland although the largest land use is arable farmland. There remains a well developed network of hedgerows some of which will undoubtedly be ancient. There are records of at least three species of bats from the Tilekiln area and other mammals including brown hare, suggesting the open farmland ecology is of some local interest. There are also a number of historic orchards recorded from the area.

2.6.2 The most overriding feature of this area is the pattern of fields and small woodlands and their existing connectivity. Any major development MUST ensure that the woodlands remain connected in some way – the recent developments and resulting isolation of some woods at Great Ashby MUST be avoided if at all possible. Development immediately adjacent to the woodlands on the edge of Stevenage should not be repeated on their other side. The provision of suitable GI to achieve this must therefore be carefully planned if the ecological functionality of the woodlands and hedgerows is to be maintained.

2.6.3 There would not appear to be any overriding ecological interest that would represent a fundamental constraint on development within this area. However, again there would clearly be a loss of farmland ecology which given the hedgerows and grasslands at this location would have at least a moderate impact locally. However we have no information to suggest there is any significant value, at least sufficient to prevent development assuming an acceptable layout can maintain suitable connections between woods and provide a variety of grasslands.

2.6.4 Community orchards and a positive approach to ecological management of grasslands would be particularly beneficial given the countryside and ecological character that would otherwise be lost. It is noted that steeply sloping chalk scarps are present (2.101) and if appropriate these should be protected and enhanced ecologically as part of any GI. In this respect the area is likely to be at least moderately sensitive to development.

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2.7. West of **Stevenage**

2.7.1 This area contains a number of Wildlife Sites – **Lucas Wood** in the very north, and **High Broomin Wood** and **Upper Kitching Spring** in the very south. The development area lies immediately adjacent to part of **Knebworth Woods SSSI** – both the old Green Lane section and Burleigh Meadow, the latter one of the most valuable neutral grassland sites in the county and highly sensitive to disturbance and management issues. Otherwise the majority of the area is intensive arable, largely open with few hedgerows, with a few small areas of grassland around Almshoe Bury and Lucas Wood. The hedgerow adjacent to the old Roman Road is known to be species rich and likely to be ancient. The southern area overlaps a little with potential Great crested newt zones, although these may not be a major issue given the current land use.

2.7.2 I would suggest the thin extension south for potential development lacks a sensible pattern for such 'ribbon development' when the existing land use / land form does not in lend itself to this approach. It is barely 100 m wide at High Broomin Wood and the proposed fields are otherwise set within a very open area. Furthermore this approach to development will also increase residual impacts on the SSSI and associated features. However it is recognised that any development here would only proceed if land to the east within Stevenage was also developed (2.108), which would also result in an increased impact overall.

2.7.3 There would not appear to be any significant ecological constraint on development in this area. Again the ecology of arable farmland will be lost, although such aspects would have been considered as part of the original west of Stevenage proposals. As I understand, no fundamental constraints were apparent from any of the studies and mitigation was proposed for what particular interests were found to be present (primarily farmland birds). However, there was no guarantee that any landowners could be identified to undertake appropriate management activities that would be needed to compensate for these species – see below.

2.7.4 The proposal site has, overall, limited ecological impact although the Wildlife Sites MUST be protected and enhanced. I see no merits in the southern extension given the impacts this could have on WS and the SSSI and I think this would far better represent largely if not entirely some form of Green Infrastructure. However if part of a larger development proposal this may be more acceptable although this would also increase considerably the overall ecological impacts. As such I consider that the ecological sensitivity would be at least moderate.

2.8. **Overall comments on Strategic Sites**

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2.8.1 It is assumed that all of the Wildlife Sites and other major habitat features currently present within the strategic areas will be protected. If not, clearly the impacts and acceptability of the proposals would be very different, although any such losses would not be consistent with the NPPF.

2.8.2 All of the development proposal sites except Rush Green are on open land and will inevitably be damaging to any existing farmland ecology. This cannot be mitigated for on-site and will be difficult to compensate for off site unless a suitable mechanism can be found if this is justified. This would in any event be a planning requirement rather than an agri-environment scheme which is a voluntary option elsewhere. I am not convinced that unless biodiversity offsetting land is found, an acceptable outcome will be found unless wiling landowners can be convinced of supporting an option which will be imposed on them given the planning requirement for delivery.

2.8.3 A crude ecological sensitivity of the development sites is given below, where 1 = low sensitivity and 5 = high sensitivity.

SW Hitchin = 4/5
N or Letchworth = 2
E of Luton = 2/3
Rush Green = 1
N of Stevenage = 2
NE of Stevenage = 3/4
W of Stevenage = 3/4

This estimate is a judgement based upon the above evidence, not any detailed studies which I would expect to be provided in the event of any of these sites taken further forward. **It also assumes that ALL of the Wildlife Sites included within the areas will be protected and also connected in some way as part of GI**.

2.8.4 On this basis there will inevitably be a loss of biodiversity associated with open arable farmland and this is unlikely to be replaced. Wildlife Sites – largely woodlands - may be protected but subjected to increased disturbance which may directly affect their ecology but also the management required to maintain or enhance this interest, especially if this requires traditional grazing. However whilst there are limited areas of good grassland affected, those that are, are very important. Retention of management objectives is therefore essential in order to achieve any form of sustainable development.

2.8.5 Opportunities to engage new communities with their local environments are also important given the current disconnect that exists. Simply providing GI is insufficient – it must be made to work for at least some of the communities in a functional manner. Provision of allotments, Community orchards and other conservation activities will be required to achieve this.

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3. Housing Options Part 3: Non-strategic sites

The proposal sites will be considered under a number of headings, based upon a review of existing information. Comments on all the sites refer to all Priority 1, 2 and 3 Sites but *not* failed Sites on the basis that these, having failed, are not being considered by the LPA for development.

3.1 Ashwell (4 Sites)

Recognised ecology sites within Sites : No
Recognised sites adjacent / close to Sites: No
Other features: Hedgerows, loss of trees in A/r01; loss of ruderal habitat within 003
Protected species: Bats in area; reptiles potential in 003
Opportunities: Retention of trees in A/r01; hedgerows in 003.
Ecological sensitivity:

- A/r01 - locally mod /high if requires all tree removal;
- 002 - low;
- 007 - low;
- 003 - locally low / moderate.

Fundamental ecological constraints: No.

3.2 Baldock (14 Sites)

Recognised ecology sites within Sites: No
Recognised sites adjacent / close to Sites: B/r23 – close to Ivel Springs LNR& WS, avoid hydrological and other indirect impacts; 012 avoid impacts on Weston Hill WS
Other features: scrub / hedgerows by B/r1a
Protected species: Possible lizards B/e 03 B/e 03a, B/r1a, B/r2a, B/r11a
Opportunities: Retention of hedgerows; compensation grasslands and trees if lost; planning needs to see bigger picture re GI
Ecological sensitivity:

- 11 - low ; 12 – low NB Adj Weston Hills;
- 14 - low NB retain shelter belts;
- 16 – locally high, loss of Green corridor into recent development;
- B/e 03 & B/e 03a - low (NB lizards);
- B/r1a – low (NB lizards);
- B/r2a – low (NB lizards);
- B/r03 – locally moderate, loss of rough grassland – lizards?;
- B/r04 – low;

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- B/r11a - low;
- B/r12 – low NB corridor role;
- B/r14 – locally low / moderate if loss of trees;
- B/r23 – low but NB Ivel Springs to west requires protection.

Fundamental ecological constraint: concerns over 16 – MUST retain corridor link**;**

3.3 Barkway (6 Sites)

Recognised ecology sites within Sites: No
Recognised sites adjacent / close to Sites: No
Other features: Hedgerows / hedgerow trees, scrub
Protected species: Area good for bats;
Opportunities: Compensate for loss of grasslands and trees; losses of
Ecological sensitivity:

- 19 – low?; 20 – locally moderate;
- 23 – locally moderate;
- BK/r02 & BK/r03 – low NB loss of amenity grassland and local habitat features;
- BK/r04 – low, NB loss of grassland, unknown quality.

Fundamental ecological constraint: Some concern re 23 – scattered trees over partly improved grassland with blocks of scrub on edge. Some concern re 20 – loss of trees, scrub, rough grassland on old orchard site.
Comments: Unlikely that ecological interest sufficient to prevent development but some compensation should be considered for cumulative losses of grasslands and trees.

3.4 Barley (4 Sites)

Recognised ecology sites within Sites: No
Recognised sites adjacent / close to Sites: No
Other features: trees and hedgerows – retained where possible, farmland birds in general area
Protected species: bats within village
Opportunities: historically orchards locally frequent – potential for new orchard
Ecological sensitivity:

- 24 - low;
- 25 - ?low, adjacent to allotments;
- 27 – low / moderate (impact on small copse of mature trees) and adjacent hedgerow;
- BL/r02 - low

Fundamental ecological constraint: most unlikely – grasslands at 25 and 27 probably improved but no data. Tree copse at 27 locally significant within site – retain if possible.

3.5 Clothall (0 Sites)

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Recognised ecology sites within Sites: Yes – but not considered further as Option 28 failed test
Recognised sites adjacent / close to Sites:
Other features:
Protected species:
Opportunities:
Ecological sensitivity: High
Fundamental ecological constraint: Yes – mostly Wildlife Site.

3.6 Codicote (3 Sites)

Recognised ecology sites within Sites: No
Recognised sites adjacent / close to Sites: Yes – WS adj 29;
Other features: Old orchard site on 030 and access close to pond. Rank grassland and variety of hedgerows
Protected species: Bats generally
Opportunities: Community orchard and grasslands
Ecological sensitivity:

- 29 – low / moderate;
- 30 – low?;
- 32 – low / moderate;

Fundamental ecological constraint: Overall probably not but:

- 30 - grassland, hedgerow and trees, unlikely to represent constraint but no data.
- 32 - rank grass, scattered scrub and hedgerow a locally valuable resource – needs assessment. If ex-arable unlikely to be of particular habitat importance.
- 29 – sizeable grassland and adjacent mature hedgerow – requires survey.

3.7 Gravely (1 Site)

Recognised ecology sites within Sites: No
Recognised sites adjacent / close to Sites: No
Other features: adjacent tree block
Protected species: No
Opportunities: Any new feature would be a bonus!
Ecological sensitivity:

- 35 - low .

Fundamental ecological constraint: No.

3.8 Hitchin (15 Sites)

Recognised ecology sites within Sites: No
Recognised sites adjacent / close to Sites: 98 – adj Folly alder Swamp WS;
Other features: Remnant hedgerows, R Purwell (110); R Hiz (133, H/m02&3);

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Protected species: Reptile interest potentially present in places eg H/r28, H/r30.
Opportunities: River corridors, grassland and community orchards - historic features within Hitchin. Replacement trees and scrub where possible.
Ecological sensitivity:

- 39 – low / moderate. Includes large area of v probable ridge and furrow grassland, likely improved but not ploughed, with other earthworks. Remnant hedge features. ;
- 98 – low / moderate – adj to WS;
- 110 – low, but adj to R Purwell which would require adj buffer and corridor. ;
- 133 – low NB adj. R Hiz;
- H/m02 & H/m03 – low NB includes R Hiz;
- H/r07 – low, adj trees and scrub;
- H/r14 – low if grassland loss of little interest (no data) and scattered trees – old orchard site;
- H/r 24 – low. Sports grassland unlikely to support significant interest;
- H/r25 – low unless loss of grassland (no data) significant.
- H/r28 – low / locally moderate. Loss of disturbed brownfield land where sidings remain and likely to support reptile interest (close records).
- H/r30 – possible moderate. Rank grassland, scrub and surrounding hedgerows, also adj to Oughton Head Lane green lane. No data – reptile potential also.
- H/r43 – low; mature trees present may need to be protected.
- H/r48 - low;
- H/r50 - low.

Fundamental ecological constraint: 39 – need more information. Grasslands may retain some interest. 98 – potential grassland interest – no data. H/r28 – protected species need to be considered if present. H/r 30 - more data required on grassland.

3.9 Ickleford (2 Sites)

Recognised ecology sites within Sites: No
Recognised sites adjacent / close to Sites: Houghton Head WS – close to R Houghton corridor.
Other features: Scrub / hedgerows
Protected species: Water voles recorded in river.
Opportunities: Retention of boundary features / habitats
Ecological sensitivity:

- 40 – low / ?moderate. Grassland, scrub and hedgerows. No data – requires survey for reliable assessment.
- 41 – low? Survey required. Historic orchard site – grassland, potential GCN habitat, adjacent scrub and trees.

Fundamental ecological constraint: 40 and 41 require surveys to confirm lack of interest, or inform requirement for compensation.

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3.10 Kimpton (5 Sites)

Recognised ecology sites within Sites: No.
Recognised sites adjacent / close to Sites: No.
Other features: Secondary woodland / hedgerows, location for historic orchards
Protected species: Bats in general area
Opportunities: Community orchards; woodland creation if proposed area lost
Ecological sensitivity:

- 43 – moderate – locally high. Historic orchard site – significant area of trees included – no data on species. Wide hedgerows, lane and large allotment – potential for reptiles. Requires survey to assess full impact.
- 44 – low. Scattered mature trees.
- 144 – low – adjacent remnant hedgerow.
- K/r01 – low; adjacent hedgerows.
- K/r02 – moderate / locally high. Lloyd Way Meadow (secondary woodland) will be lost, locally significant in the context of Kimpton.

Fundamental ecological constraint: 43 requires survey; K/r02 should be surveyed and compensated for if lost.

3.11 King's Walden (includes Breachwood Green) (3 Sites)

Recognised ecology sites within Sites: No.
Recognised sites adjacent / close to Sites: Watkins Wood and Lords Wood WS adjacent to 50
Other features: Allotments affected by 49 and 51
Protected species: Bats in area
Opportunities: Replacement allotments; historic orchards in village.
Ecological sensitivity:

- 49 – low largely arable (NB includes allotments – loss of habitat and potential for reptiles. Requires replacing if lost);
- 50 – low? Smaller grassland obviously disturbed (dog training ground), larger field requires survey, no data;
- 51 – low NB loss of allotments – potential reptile interest.

Fundamental ecological constraint: 49 and 51 – allotments; reptile surveys required and compensation if justified.

3.12 Knebworth (8 Sites)

Recognised ecology sites within Sites: No.
Recognised sites adjacent / close to Sites: No.
Other features: Pond in 52
Protected species: Bats in general area
Opportunities: Community orchards.
Ecological sensitivity:

- 52 – low and ?low/ moderate. Half site is rough grassland, divided by ?ancient hedge.

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- 53 – low, intensive arable. Gipsy La hedgerows should be protected.
- 54 – ?low, part rough grass, possible reptile/amphibian interest given adjacent railway line embankment and pond. Surveys required.
- 55 – low, intensive arable.
- 56 - ? low – grass and hedgerows, requires survey.
- 57 – low, arable, small areas of grassland and copse. Old field hedgerows.
- 58 – low. Arable – NB roadside hedge to be retained.
- KB/m01 – low, developed land.

Fundamental ecological constraint: 52 and 54 requires survey of rough grassland and possibly pond. Retention of edge rough grasslands and hedgerows at 57.

3.13 Letchworth garden City (14 sites)

Recognised ecology sites within Sites: No.
Recognised sites adjacent / close to Sites: No.
Other features: Rough grasslands and scrub, woodland.
Protected species: Lizards – associated with railway line.
Opportunities: Compensation should be required for loss of habitats and new allotments / community orchards and rough grasslands if no net loss to be achieved.
Ecological sensitivity:

- GWK – largely low; NB includes locally valuable rough grassland and scrub edge – possible reptile interest, lizards known from railway line. Surveys required.
- L/m1 - low
- L/m2 - low
- L/o2 – low, adj. block of trees.
- L/o4 – low / moderate. Possible ridge and furrow grassland, rough grassland and scrub edges. May have relict reptile population. Requires surveys.
- L/o7 – low? Possible GCN habitat. Hedgerows / trees around edge. Grassland unlikely to be of interest but requires survey.
- L/r02 – low. Brownfield hard standing. NB tree lined avenue adjacent to railway. Site may support lizards if habitat appropriate.
- L/r08 - low
- L/r13 – low / moderate. Largely arable but significant edges of well established allotments, rough grassland and scrub. Reptile interest likely.
- L/r16 – low. NB railway edge of trees, may include lizards. Survey if habitat appropriate.
- L/r18 – low? Roughish grassland and scrub feature - no data. Requires survey to fully assess.
- L/r24 – moderate. Historic orchard sites – now largely mature trees. Adj. to allotments.
- L/r26 – low. NB Scattered trees and lizards likely by railway line.

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- L/s02 - low

Fundamental ecological constraint: Unlikely that any of the above would, ultimately represent fundamental constraints although **s**everal of the above sites include allotments, rough grassland, scrub, trees and small woodlands. L/r24 would represent the most established loss and is clearly of local importance, whilst L/o4 may also support old grassland. Several of these clearly support locally important ecological resources and are likely to support protected species. The railway line provides a recognised linear habitat for lizards, from the Industrial Estate to the Station and these may use adjacent and close by habitats where appropriate. Surveys are needed to properly assess these habitats and species and appropriate compensation provided where necessary.

3.14 Nuthampstead (1 Site)

Recognised ecology sites within Sites: No.
Recognised sites adjacent / close to Sites: No.
Other features: Adjacent to pond, hedgerows / scrub.
Protected species: Bats present within site
Opportunities: Retain adjacent habitats.
Ecological sensitivity:

- 63 – low. NB Nursery colony of bats recorded within former depot.

Fundamental ecological constraint: Bats must be surveyed, assessed and appropriate recommendations provided.

3.15 Offley (2 Sites)

Recognised ecology sites within Sites: No.
Recognised sites adjacent / close to Sites: No.
Other features:
Protected species: Potential reptiles.
Opportunities: Replacement allotments already on other side of road? Community orchard.
Ecological sensitivity:

- O/r01 – low. Historic orchard site, largely ruderal vegetation. Quite possibly supports reptiles – survey required.
- O/r02 – low / locally moderate. Large area of redundant allotments, adjacent mature hedgerow / tree belt. Likely to support reptiles – survey required.

Fundamental ecological constraint: Unlikely. Protected spp surveys required.

3.16 Pirton (1 Site)

Recognised ecology sites within Sites: No
Recognised sites adjacent / close to Sites: No
Other features: Hedgerows
Protected species: Within GCN zone but regular management may limit permanent habitation other than in hedges.

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Opportunities: Retain hedgerows; community orchard.
Ecological sensitivity:

- 64 – low? Possible ridge and furrow grassland may retain botanical interest – requires survey.

Fundamental ecological constraint: Unlikely – survey required. Dividing hedge may be Important if follows historic field pattern.

3.17 Preston (0 Sites)

Recognised ecology sites within Sites: No.
Recognised sites adjacent / close to Sites: No.
Other features:
Protected species:
Opportunities:
Ecological sensitivity:
Fundamental ecological constraint:

3.18 Reed (3 sites)

Recognised ecology sites within Sites: No.
Recognised sites adjacent / close to Sites: No.
Other features: Hedgerows and dense bramble patches.
Protected species:
Opportunities: Community orchards – historically present.
Ecological sensitivity:

- 73 – low. Small rough grassland verges and scrub.
- 81 – low?, possible ridge and furrow grassland, requires surveying.
- RD/r01 – low? Rough grassland and hedgerows – surveys required.

Fundamental ecological constraint: Surveys of grasslands to enable assessments to be made.

3.19 Royston (13 Sites)

Recognised ecology sites within Sites: No.
Recognised sites adjacent / close to Sites: No.
Other features: Loss of rough grasslands, tree belts.
Protected species: Lizards a feature of at least the N edge of the town.
Opportunities: Compensation grasslands; community orchards to reflect historic features.
Ecological sensitivity:

- 84 – low. Rough grass and scrub – may support reptiles. Requires surveys.
- 85a & 85b – low. Roadside trees and tree clump (A505 & Newmarket Road) should be retained. Potential lizards on edge.
- 126 – low. Rough grass and surrounding hedgerows – survey to confirm assessment.

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- R/e2 – low / locally moderate if local tree belts within and adjacent to site lost.
- R/o2 – low? Rough grass (database site) and hedgerows – need surveying. .
- R/r03 – low. NB Lizard populations present.
- R/r06 – low.
- R/r07 – low. Local tree belts.
- R/r11 - low. NB Lizard populations adjacent.
- R/r13 – low.
- R/r16 – low. Rough grass may support protected reptile species although site rather isolated.
- R/r19 – low. NB Lizard populations present.

Fundamental ecological constraint: Local lizard populations will require surveying and translocation where necessary. Local tree belts retained where possible – important as corridors in urban area. Rough grasslands may be of local value – compensate if necessary.

3.20 Sandon (2 Sites)

Recognised ecology sites within Sites: No.
Recognised sites adjacent / close to Sites: No.
Other features: Hedgerows, village green
Protected species: Bats.
Opportunities: Community orchard
Ecological sensitivity:

- 86 – low / locally moderate. Grasslands, ponds, scrub and trees – need surveying to confirm assessment. Bats at adjacent farm.
- S/r03 – low. Rough grassland and hedgerows. Survey to assess.

Fundamental ecological constraint: Surveys to confirm assessments – 86 probable low quality but locally diverse resource.

3.21 St Ippolyts (2 Sites)

Recognised ecology sites within Sites: No.
Recognised sites adjacent / close to Sites: Wymondley Transforming Station WS
Other features: Veteran tree close to 99
Protected species:
Opportunities: Community orchard to reflect historic sites.
Ecological sensitivity:

- 99 – moderate. Rough grassland and scrub. Survey required.
- SI/r3 – low / ?moderate. Rough grassland, scrub and trees, roadside hedge. Needs survey for assessment.

Fundamental ecological constraint: Unlikely but habitats need surveying to determine.
Comment: Local losses if sites developed – compensation may be required.

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3.22 St Paul's Walden (includes Whitwell) (3 Sites)

Recognised ecology sites within Sites: No.
Recognised sites adjacent / close to Sites: No.
Other features:
Protected species:
Opportunities: Local landscaping and retention of hedgerows.
Ecological sensitivity:

- 116 – low / locally moderate if trees lost to development.
- WH/r1 – low, but small parcel of rough grass needs surveying. Adjacent hedgerows
- WH/r2 – low. Adj. hedge

Fundamental ecological constraint: Unlikely

3.23 Therfield (2 sites)

Recognised ecology sites within Sites: No.
Recognised sites adjacent / close to Sites: No.
Other features: Hedgerows
Protected species: Great crested newts in area.
Opportunities: Area with former orchards – community orchard potential.
Ecological sensitivity:

- 117 – low. Rough grassland - survey to confirm lack of interest. Within GCN zone.
- 119 – low? Grassland requires survey to confirm low interest. Within GCN zone although heavy grazing would reduce likelihood of habitable site.

Fundamental ecological constraint: 117 – retain boundary road hedge. 119 boundary hedgerows should be retained – internal hedgerows already lost or degraded.

3.24 Wymondley (1 Site)

Recognised ecology sites within Sites: No
Recognised sites adjacent / close to Sites: No
Other features:
Protected species: Bats generally.
Opportunities: Historic orchard sites.
Ecological sensitivity:

- 122 – Overall moderate. Large mixed area of mature hedgerow complexes / tree belts, woodland block and grasslands, one possibly ridge and furrow. Large ?arable field of low value. Requires surveys to confirm relative importance and appropriate development strategy if developed.

Fundamental ecological constraint: Hedgerows should be protected as far as possible – locally rich and significant resource of grasslands and hedgerows in village.

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3.25 General Comments

Based upon available data there would appear to be little or no **fundamental** ecological constraints associated with any of the smaller proposals sites. This is based upon no direct impacts on known Wildlife Sites or statutorily protected sites, although these do not represent comprehensive understanding of the District or of these sites.

However this does not mean that there will not be any ecological impacts. Numerous grasslands will be lost although these are most likely to be improved. However where more rank there may be more of a semi-natural character – without any detailed surveys it is not possible to tell what their interest or associated biodiversity is. No data exists for these sites so it is simply not possible to assess their nature, importance or the implications of development reliably without further surveys.

Clearly all such sites must be surveyed to determine what approach is appropriate. Some small blocks of trees within sites would be affected if lost – the intention should be to retain these where the trees are of some local value. Hedgerows around sites should be retained in any event unless there is a specific need for them to go. Where remnant ridge and furrow grassland exists this could suggest greater interest although a lack of deep ploughing may not reflect a lack of grassland improvement otherwise.

In any event, the overall impact is that every loss of recognisable habitat – other than heavily developed sites or intensive arable sites - represents a degradation to the local biodiversity resource especially where a local interest has been retained or developed. However many of these sites may never have been looked at critically. Consequently there would be a locally significant cumulative effect and measures should be considered as to how this can be addressed where appropriate.

Development at a number of settlement locations would seem to have a greater impact than others – these are identified as having moderate impacts, based on aerial photo interpretations of habitats, although the quality of these may be low in themselves.

Biodiversity offsetting should be considered a requirement where damaging impacts can be demonstrated on locally significant ecological resources. If none of the sites are of sufficient quality to sustain an objection, there will undoubtedly be ecological losses which should be fully considered in accordance with NPPF guidelines. It is difficult to judge what the full implications of these impacts will be without seeing any proposals which may retain many structural features and incorporate landscaping proposals sufficient to mitigate at least some impacts.

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4. North Hertfordshire Community Infrastructure Levy
Preliminary Draft Charging Schedule Consultation Paper February 2013

I would also like to make the following comments on the above consultation:

4.1 It is recognised that *most development will have an impact on infrastructure needs within an area in some way or another…[*including] *open space or anything else. Without improvements and/or new provision, additional development could place undue pressure on existing facilities and services. Therefore it is fair that development should contribute towards these costs* (1.5).

4.2 The natural environment – and its associated ecosystems services – is clearly affected by new development. Habitats will be lost; others modified and existing biodiversity degraded, reduced and altered, along with the ecological or physiographic processes that need to take place, such as water management, and biological processes such as decomposition, pollination, recycling or nutrients, etc…, in addition to changes in the physical character of the environment and its amenity value. Sometimes resources can be improved – but this may be limited given the land resources available, the justification for significant proposals and the resources available to manage habitats and features in an appropriate manner to enable genuine ecological mitigation, compensation or enhancements.

4.3 Consequently I would urge that the natural environment is considered for inclusion on an Infrastructure Projects List to help provide resources to deliver broad enhancements that may not be a direct result of a particular development, and so could possibly be otherwise secured by Condition of S106. A general resource is required to support the impacts of cumulative losses and habitat provision that numerous developments could generate, each of which may have a relatively low impact in itself but a larger, collective impact on ecology.

4.4 Following that approach, I note the inclusion of Green Infrastructure in Table 1 Total Infrastructure Requirements. GI may not in itself necessarily always provide direct ecological benefits eg footpaths etc…and so the implications of the costs of any habitat creation and appropriate management subsequently do need to be considered, as appropriate.

4.5 On this basis, my answer to Q1 is yes. I believe there is justification to introduce a CIL.

4.6 Q2 I have no reason or expertise to dispute the figures presented in the Viability Assessment. However if only half of the necessary funding will be raised in this manner, there is a danger that what would be considered as less critical issues will be under-resourced if additional resources are not found. This is likely to include GI given that this is less easy to quantify as a requirement than, say, school, sports, police etc. provision. However use of

ANGSt (Accessible Natural Greenspace Standard) may help in justifying a more robust approach.

4.7 Q3 I have no expertise or otherwise to judge whether the rates are appropriate. However I note that it is not proposed to charge Community and other uses, including agricultural, which does seem reasonable as some of these will actively contribute to the objectives of a local plan in respect of social and countryside maintenance.

4.8 Q4 Some leisure uses have a significant impact on the local environment – such as golf courses, liveries, paintballing – could be considered for inclusion at a lower rate.

4.9 Q5 I have no comments to make on this approach, other than to state that both the edge of Stevenage and Luton development locations will have a significant impact on the local countryside and increase impacts on the local character and biodiversity as a result.

4.10 Q6 I have no comments to make on this question.

4.11 Q7 This would appear to be a reasonable approach to take.

4.12 Q8 Where the development may have an overriding public interest or benefit that also contributes towards the delivery of the local plan.

Yours sincerely,

Martin Hicks
Senior Ecology Officer

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HERTFORDSHIRE ECOLOGY

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Clare Skeels
Senior Planning Officer,
Planning Policy and Projects
North Herts District Council

Your Ref:
LDF/01016

Ask for: M J Hicks
Tel: 01992 556158

Date: 27th Jan 2015

Dear Clare

North Hertfordshire District Council – Consultations:
Local Plan Preferred Options 2011 - 2031
Statement of Community Involvement
Thursday 18 December 2014 to Friday 6 February 2015

Thank you for consulting Herts Ecology (formerly Herts Biological Records Centre) on the above consultations, for which I have the following comments to make:

Local Plan Preferred Options 2011 – 2031

1. Introduction

1.2. An additional 14,200 dwellings represent a 26% increase in the number of dwellings. Whilst this will not relate directly to a similar increase of pressure on the natural environment, it will inevitably attract additional pressure on a range of resources for a variety of reasons, including the natural environment which is already under pressure from changing land uses. This will inevitably serve to degrade – albeit unintentionally – existing sites, habitats and species of importance if these resources are not properly protected *and* enhanced, to enable this extra pressure to be accommodated properly. Policies must recognise this context and seek to **conserve and expand habitats** where possible as part of the overall development process.

2. Vision and Objectives

2.1 I support the statement as expressed in Fig 1 which, following the NPPF, states the Local plan will *minimise the impacts of growth on the environment*, *climate emissions and natural resources and use the opportunities provided to*

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seek to enhance the wider environment. The **policies and proposal sites will need to be measured against these objectives** in any assessment of ecological acceptability.

2.8 **Policy SD1 Presumption in favour of Sustainable Development**.

Sustainable development is predicated on three principles – economic, social and **environmental**. This is reflected within Policy SD1 which I support, in seeking *to secure development that improves the economic, social and environmental conditions in the area.*

3. Economy and Town Centres.

The majority (93%) of N Herts District remains outside of the towns. It is generally undeveloped and remains largely in agricultural use, in places supporting some of the most iconic sites and landscapes in the county, from the Chilterns AONB to Church Hill at Therfield. However, nowhere in this Chapter is any mention of the importance of the **rural economy** in help to sustain this. Whilst I acknowledge this is perhaps relatively small in terms of employment or contribution to overall economic enterprise, it has the most profound effect on the **nature and character of the environment of North Herts** and many quality of life issues. It is therefore disappointing that this hasn't been recognised and I would hope some reference to it can be included to ensure this relationship is not wholly dismissed.

4. Countryside and Green Belt

4.1 I support the aim to promote sustainable development in the countryside, and there is here some acknowledgement of the needs of the rural population and economy to be met.

Policy CGB1: Green Belt.
4.4 I support the retention of overall extent of Green Belt protection in the District. However this is unlikely to represent any compensation as the open land resource will have been reduced and cannot be replaced. Whilst the aims of the Green Belt will be upheld this in itself will not secure the appropriate management of certain areas where necessary in pursuance of landscape or nature conservation, which in turn will relate to maintaining the economics of the management that achieves this. The **NPPF encourages planning positively** for the beneficial use of the Green Belt…**to retain and enhance landscapes, visual amenity and biodiversity.**

Policy CGB2: Rural Areas Beyond the Green Belt

4.5 I support the recognition of the **importance of the area between Baldock and Royston** and elsewhere which does not benefit from Green Belt protection, given its particular ecological characteristics. Where related to maintaining this I support the policy view that development would only be allowed in certain

circumstances, including *if it is strictly necessary for the needs of agriculture, forestry….*given the role these could play in managing important sites.

6. Housing and Development Strategy

6.1 I support the aim to **protect the largely rural character** of the remainder of the District. However protection in itself is not enough – the **means to maintain the management** that creates and sustains this character is equally important if the quality of the rural character is to be conserved.

Policy HDS4: Density

6.35 I support the aim to favour **lower density of development on the edges of settlements** as this also **allows for a better transition ecologically** between open countryside and the more developed urban environments, further enabling wildlife to use Green Infrastructure assets within the settlements themselves.

7. Design

7.1 I support the emphasis on ensuring designs to improve the character and quality of an area as a means of **minimising impacts on the environment**. The character and quality of a given area should also include its ecological characteristics both past and present, as these too contribute to a sense of place and local distinctiveness (7.2).

7.15 I support the reference to the '**Building Futures**' tool in support of reducing the environmental impact of development. This will include considerations for Landscape and Biodiversity.

Design Policy D3: Protecting living conditions

I support the Policy in respect of avoiding harm arising from light pollution resulting from development proposals.

8. Healthy Communities

Policy HC1: Community, leisure, recreation and cultural facilities

I support the objective to resist development proposals which will result in the loss of community etc. facilities *unless…there are no unacceptable impacts on the biodiversity, geodiversity, landscape or ability to enjoy the natural environment* (4).

Policy HC2: Green space

8.6 I support the statement *that green spaces form an essential part of the quality and character of the settlements, providing accessible formal recreation opportunities, informal green space, **wildlife habitats** and links to the countryside.*

8.9 I support the statement that *there may also be a requirement for additional open space in the form of buffers to sources of pollution such as roads or railway lines or for landscape, visual or **ecological** purposes.*

I support the policy aim that *public and private green spaces will be retained by…. 3. encouraging links between spaces within towns and between those spaces and the surrounding countryside.*

I note that **no reference has been made within this Chapter to the Accessible Natural Greenspace Standard (ANGSt).** This is a recognised measure of accessibility to such areas for the local community and is a measure of their relative provision to local populations. Although I consider this is difficult to apply unless there is a clear definition of 'natural greenspace' – as opposed to 'green space' which could include formal parks to sports pitches – I consider some reference to it should be made, either within the Green Space Policy or Natural Environment Policy, for completeness.

9. Natural Environment

9.1 I support the statement that *the district has a wide range of important habitats, including ancient woodlands in the south, chalk grasslands in the east and wet woodlands along the River Hiz and its tributaries*. However I would highlight the fact that many of these resources are now **relatively small** and for the most part, **highly fragmented**, and fragile in so much as their dependence upon appropriate management which itself is increasingly difficult to achieve. This statement should also refer to **sites of geological interest** as North Herts has a number of Regionaly Important Geological Sites (RIGS).

9.2 I agree that these *are among the most vulnerable features of the district when major development is proposed* and support the statement that *the district will have to accommodate significant growth during the plan period whilst ensuring environment is properly protected. This is an important element of sustainable development.*

Policy NE1: Landscape and Environmental Protection

9.3 I support the statement that the natural (and historic) *environment is under increasing pressure from development, recreational uses and changing agricultural practices, particularly adjacent to towns and villages….. It should be protected and enhanced in the future to maintain the existing high quality of life that people in the district enjoy.* In practice I consider this will involve supporting both **habitat creation** to improve connectivity **and appropriate management activities** to make the ecological resource more robust.

9.6 I remain **unconvinced that protecting sites by avoiding damaging development will necessarily protect the quality of the natural environment**. Whilst this is obviously important, this resource could be subject to increased pressure from development generally and there is little or no control in any event on existing or future management of ecological sites which is the principle key to ensuring their quality is maintained or enhanced. For example, chalk grassland quality is as much a function of appropriate livestock and grazing levels – itself a function of agricultural economics - as is its protection from damaging development. I consider this issue should be recognised within the plan to enable it to be addressed where planning opportunities allow.

9.9 I support the aim to ensure that a development proposal *makes a positive contribution to the landscape.*

In respect of the policy, I suggest the terms **'maintain and enhance'** re. the natural environment are better as these better reflect *what* the policy is seeking rather than *how*. Protection of the resources is achieved by the implementation of this policy – although management issues remain outstanding.

I support the Policy statement that *Development proposals that would be detrimental to the natural environment will be refused where suitable mitigation measures cannot satisfactorily address the adverse impact.*

Policy NE2: Green Infrastructure [GI]

9.10 As outlined above within Green Space, there is no mention of 'natural greenspace' or ANGSt. There is a significant difference between a **natural greenspace** where 'natural' character predominates and a greenspace which is managed formally for **intensive or formal amenity** use. Both will be considered as Green spaces, and green infrastructure, but have very different qualities, functions and contributions to make. I would have preferred to see some recognition of this, even if ANGSt has not been followed as the principle differences remain valid and important with respect to biodiversity contribution.

The role of **agriculture / farming / farmers** in supporting the management of GI is **not recognised** and should be addressed. Many urban fringe sites are still dependant upon traditional management provided by this and without it, the quality of these resources will degrade under an absence of, or inappropriate, management.

9.11 I support the statement regarding **networks of biodiversity and GI**. This recognises the implications of this approach – from creation and protection to enhancement and management needs.

9.12 This could also include **local food** as a benefit of GI – as demonstrated by allotments and orchards in addition to produce derived from gardening or even foraging, all of which have an impact on provision of biodiversity.

9.16 I strongly support the statement that *The policy will also ensure that where new green infrastructure is created appropriate management and maintenance regimes are in place to provide the framework for its long-term use.*

I support the objectives as set out within Policy NE2: Green infrastructure.

Policy NE3: Biodiversity

9.19 I advise that this should more correctly refer to HMWT *Nature Reserves,* and also to *Wildlife Sites* which is the standard term accepted throughout Hertfordshire for non-statutory sites of recognised biodiversity importance. WS are overseen by a partnership of HMWT, HE, NE etc…to ensure a robust protocol for identification and general management of the system is maintained.

9.20 This statement should also refer to the presence of **important species** across the District, from European and Nationally Protected Species, to more local rarities and others that **should be considered in development proposals**. Consequently these would also need to be reflected in providing net gains, where appropriate. Species will - in part – be dependent upon the nature and quality of habitat resources available to them, and **must be recognised by the planning process as a material consideration** despite any existing legislation for their protection.

It should also refer to the role of **ecosystem services** (e.g. pollination, water and nutrient cycling) and recognise their wider benefits (provisioning, regulating, supporting and cultural services).

There should also be recognition of the importance of **planning for landscape scale biodiversity resources**. The evidence for this will include the mapping of known sites, networks, corridors and stepping stones, as well as areas for restoration and creation. These should include provision for priority habitats and species. Reference should be made to the **Ecological Networks** mapping undertaken on behalf of the **Local Nature Partnership** to help inform this process.

There should also be reference to the role of **Hertfordshire Environmental Records Centre** in providing the **evidence base of ecological resources** required to inform policies and their implementation, as required by NPPF. This includes sites, habitats and species data and is continuously updated as new information and datasets become available. This is a similar role to that of the Historic Environment Record, which is described in 10.10 and 10.12.

There are currently **no indicators for monitoring** within the plan, although several species groups in Hertfordshire benefit from regular volunteer

monitoring which provide contextual information on some biodiversity resources generally. This information is also held by the Local Records Centre. I consider the **Local Plan should support the function of HERC** and the volunteer recording effort which helps to help provide what is in effect the only species monitoring data available.

9.21 I consider that this should better reflect the hierarchy of site status so that their protection – and consequently mitigation options - is commensurate with their status. This is reflected in the NPPF which in relation to the hierarchy of sites, states that protection is commensurate with status, giving appropriate weight to their importance and contribution to ecological networks when considering development.

Policy NE3: Biodiversity
I am unclear as to why Local Wildlife Sites are referred to as *managed*; SSSIs and LNRs also need to be managed; I consider **this term is unnecessary in this context and should be removed.**

I do the policy could more accurately reflect the **hierarchy** outlined above; SSSIs are of national importance and damaging development should only be allowed where this national interest is considered to be outweighed by the needs of the development, whatever mitigation or compensation is provided. The same relative approach would be applied to sites of lower status. I consider the policy should better reflect this, consistent with NPPF.

I consider that the **wording** of the final paragraph **needs improving** for clarification: *Development proposals should also demonstrate that where ~~if there are~~ existing wildlife habitats such as trees, hedgerows and woodlands ~~they~~ will be retained, they will be safeguarded and managed during and after development in the appropriate manner.*

Currently, the wording implies that there is an assumption such features *will be* incorporated into developments, which although desirable may not be the case as in order to accommodate a development, there is often a requirement for tree removal etc. It is only when such features are to be retained that the LPA needs to ensure they will be properly maintained during and after development.

Policy NE4: Renewable energy development
I support the policy in respect that proposals for renewable energy will be supported *subject to an assessment of the impacts*, which include any affecting **environmental assets**. These will include recognised **sites** as well as both **habitat and species interests** generally that could be present. There may also be opportunity for biodiversity enhancements depending on the existing nature of the site and the types of proposals.

Natural Environments Policy NE5: Delivering sustainable water supply.

I support the aims of this policy in seeking to reduce and manage water consumption, given the **impact** abstraction has **on hydrology and local ecological resources** such as chalk streams, rivers and spring sources.

Policy NE6: Reducing flood risk

9.36 I support the statement that SuDS *may be interlinked with open space, highways, ecological and/or landscape features.* This recognises the **multi-functionality** of open spaces in particular, and the need to design such features into schemes from the outset. In this respect**, land management** operations also become increasingly important and influential in helping to provide broader solutions to drainage problems.

Natural Environment Policy NE6: Reducing flood risk
I support the policy which states: *The most sustainable drainage solutions will be sought for each development to reduce the risk of surface water flooding, enhance biodiversity, water quality and provide amenity benefits. Sites should aim to mimic the drainage of an undeveloped greenfield site.*

I would make the observation is that 'greenfield' sites can vary hugely in their existing capacity to influence hydrology. Differences between more simple systems of bare, arable fields or closely mown, species-poor amenity grassland, to more complex vegetation of unimproved or longer grassland with hedgerows, scrub or trees will influence the soil characteristics and hydrology significantly in terms of storage capacity, water uptake or surface evaporation. Perhaps a better statement would be *to mimic natural drainage patterns and processes as far as possible.* This should have **positive implications for biodiversity**.

Policy NE7: Water quality and environment

9.39 I support the statement that the policy will ensure *that the design of the development conserves precious water resources, improves water quality and enhances the natural environment.*

9.40 I support the inclusion of the statement *The NPPF emphasises the importance of natural networks of linked habitat corridors to allow the movement of species between suitable habitats and promote biodiversity. River corridors are particularly effective in this way.* Indeed, rivers are about the only **continuous linear habitat features** of any significant consequence at the landscape scale, and are considerably enhanced when associated with their respective floodplain habitats.

9.41 I support the recognition of this in the next paragraph which states *Rivers and watercourses enhance the quality of the environment. Their protection and enhancement will improve the enjoyment of these assets, enhancing biodiversity and make them more resilient to current and future pressures. This can be achieved through the use of buffers alongside watercourses and through restoration projects as part of development schemes.*

Natural Environment Policy NE7: Water quality and environment
In this respect I support the policy objective that *All new development proposals will seek to make space for water and will maintain a minimum 9 metre7 wide undeveloped buffer zone from all designated main rivers and 5m for ordinary watercourses to enhance and protect local biodiversity and wildlife corridors and ensure the preservation of acceptable flood flow routes is maintained.*

I also support the **river restoration proposals** where development affects nearby watercourses or sites close to a river.

Natural Environment Policy NE9: Contaminated land
I support the objectives of this policy which *include Development proposals must give consideration to the potential or actual impact of land contamination, whether naturally occurring or man-made, on surrounding receptors….. Receptors may include human beings, the built environment and the natural environment, including controlled waters.*

11. Infrastructure & Delivery

11.2 In support of implementation I consider some **reference** should be made of the **advisory services** which LPAs – including NHDC – have collectively supported within Hertfordshire to enable appropriate advice to be provided in specialist disciplines – such as **ecology** or archaeology.

11.8 I support the statement that *the provision of other forms of infrastructure, such as…green infrastructure should not be underestimated. They are highly important in achieving the objectives and vision of this Local Plan and achieving sustainable communities.*

11.19 I support the statement that *development pressures have the potential to have a significant impact on the natural, historic or built environment. This could be through removing trees leading to a change in the biodiversity and landscape character of a site…. One of the aims of the Local Plan is to seek to conserve and enhance such features. However, if there are reasons to allow proposals that outweigh any significant harmful effects, then these will need to be minimised and mitigated against. This policy seeks to ensure this.*

Infrastructure & Delivery Policy ID2: Masterplans
In respect of the preparation of masterplans for north of Baldock, north of Letchworth, east of Luton and north of Stevenage, I support the following which will be considered:
• *The amount and function of open space and green infrastructure;*
• *Protection of biodiversity, landscape and the historic environment;*

12. Communities

12 Part I Development for North Hertfordshire's own needs

Ashwell

Site AS1

Recorded ecology sites within Site : No, but considered to provide existing habitat interest.
Recognised sites adjacent / close to Site: No
Other features: Loss of ruderal / rough grassland habitat developed within site.
Protected species: Bats in area; reptile potential in site.
Opportunities: Retention of boundary hedgerows, offsetting to compensate for habitat loss – within an area considered medium priority for habitat creation.
Ecological sensitivity: low / moderate
Fundamental ecological constraints: None apparent – requires Phase 1 survey to confirm interest; retile survey required, retention of vegetated Green Infrastructure.

Baldock

Site BA1 Blackhorse Farm

Recognised ecology sites within Site: Yes**.** The area is now identified is ten times the size of the original consultation, although a larger was included within an additional area study. The area now includes a Wildlife Site roadside verge important for its characteristic chalk rarities and local BAP species. This area of farmland was included within a three Counties (Beds/Camb/Herts) Corn Bunting* survey in 2014 which showed this area to be one of the most important for the remaining Corn Bunting population in Hertfordshire with about 10% of the county total. The open chalky area of North Herts remains a stronghold generally for this species, principally from Baldock to Royston and beyond. Good numbers of Yellow Wagtails* were also found in the area in addition to Grey partridge* and Linnet.
Recognised sites adjacent / close to Site: Blackhorse Farm Meadow Wildlife Site and Ivel Springs WS and LNR.
Other features: scrub / hedgerows, Bygrave Road verge generally with locally valuable chalk remnants.
Protected species: Important Priority Bird Species* above. Possible reptiles along hedgerows, field baulks and railway.
Opportunities: Retention of hedgerows; compensation enhancements for bird habitat loss, roadside verge habitats as part of GI.
Ecological sensitivity: High for farmland bird species and rare plants.

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Full impact on priority bird species needs assessing – relative significance of site and opportunities for Biodiversity offsetting should be identified.
Ivel Springs to west requires protection and appropriate management.
Fundamental ecological constraint: Yes if priority bird species are not adequately considered in respect of impact prior to taking site forward with suitable conservation measures. Reptiles and roadside verge flora must also be considered. Area considered to be low / medium for habitat creation. Hydrological sensitivities associated with Ivel Springs.

Site BA2 Land west of Clothall Road

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: Weston Hills WS
Other features: Existing hedgerows
Protected species: Possible reptiles if rough grassland persists – recorded at Weston Hills lizards
Opportunities: Retention of hedgerows; compensation for loss of rough grasslands if necessary.
Ecological sensitivity: low
Fundamental ecological constraint: none apparent although, loss of habitat of site value. Survey required for reptiles

Site BA3 Land south of Clothall Common

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: None
Other features: Wallington Road verge, edge to A505 Baldock by-pass cutting.
Protected species: Possible lizards along road verges – previous records.
Opportunities: Hedgerows and GI creation – corridors along by-pass and Wallington Rd verge. .
Ecological sensitivity: low
Fundamental ecological constraint: Reptile surveys needed.

Site BA4 Land east of Clothall Common

Recognised ecology sites within Site: No – identified as supporting existing habitat, developed following by-pass creation.
Recognised sites adjacent / close to Site: None
Other features: Rough grassland and scattered scrub; Royston road verge
Protected species: Possible lizards
Opportunities: Roadside verge corridor and compensation grassland / improved management of remainder.
Ecological sensitivity: low
Fundamental ecological constraint: Reptile interest or butterfly interest on developing grasslands.

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BA5 Land off Yeomanry Drive

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: None
Other features: scrub / rough grassland habitat
Protected species: Possible reptiles
Opportunities: Retention of hedgerows; compensation for loss of rough grassland if developed lost;
Ecological sensitivity: low at District level; high locally given its existing GI and existing green corridor role through recent development.
Fundamental ecological constraint: retention of corridor link into new development from west.

BA6 Land at Icknield Way

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: None
Other features: adjacent railway scrub / hedgerows
Protected species: Possible reptiles associated with railway corridor – site itself unlikely to support depending on condition – if redundant and brownfield for a number of years reptiles could readily colonise.
Opportunities: Retention of hedgerows / scrub.
Ecological sensitivity: low
Fundamental ecological constraint: none – reptile survey if habitat suitable.

BA7 Land rear of Clare Crescent

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: None
Other features: trees / woodland / scrub
Protected species: Possible reptiles if open habitats remain – former allotment gardens.
Opportunities: Retention of boundary scrub; replacement of habitat through offsetting
Ecological sensitivity: low – locally moderate. The site currently provides local GI and habitat resource within urban area.
Fundamental ecological constraint: unlikely – reptile survey may be required

BA8 Works, station Road

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: None
Other features: No
Protected species: Unlikely

Opportunities: Limited – wholly developed site
Ecological sensitivity: negligable
Fundamental ecological constraint: No

BA9 Adjoining Raban Court

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: None
Other features: No
Protected species: Unlikely
Opportunities: Limited – wholly developed site
Ecological sensitivity: negligable
Fundamental ecological constraint: No

BA10 Royston Road

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: None
Other features: Rough grassland, hedgerows and scrub
Protected species: Reptiles by railway and elsewhere as habitat is suitable
Opportunities: GI boundaries; biodiversity offsetting potential
Ecological sensitivity: low - moderate
Fundamental ecological constraint: No – reptile surveys

BE1 Bondor Business Centre

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: None
Other features: No – other than some boundary scrub
Protected species: Unlikely
Opportunities: Limited – wholly developed site
Ecological sensitivity: negligable
Fundamental ecological constraint: No

BE2 Royston Road

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: None
Other features: Railway edge, small ruderal / grassland GI
Protected species: Reptile potential
Opportunities: Limited – essentially developed site
Ecological sensitivity: low
Fundamental ecological constraint: No

BB1 Bondor Business Centre East

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: None
Other features: No – some boundary scrub may present within site.
Protected species: Unlikely
Opportunities: Limited – wholly developed site
Ecological sensitivity: negligible
Fundamental ecological constraint: No
Barkway

BK1 Land west of Cambridge Road

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: No
Other features: Hedgerows / hedgerow trees; grassland identified as having potential interest but also could be overgrazed horse paddock
Protected species: Barkway area good for bats;
Opportunities: Compensate for loss of grasslands if considered necessary;
Ecological sensitivity: low, NB loss of grassland, unknown quality.
Fundamental ecological constraint: None apparent – former pond may contain water. Phase 1 survey of grassland to confirm value. .

BK2 Land off Windmill close

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: No
Other features: Hedgerows scattered trees
Protected species: Barkway area good for bats;
Opportunities: Compensate for loss of grasslands and trees if necessary
Ecological sensitivity: low – loss of urban GI on edge of intensive arable
Fundamental ecological constraint: None likely – requires Phase 1 survey to assess any interest

Codicote

CD1 Land south of Cowards Lane

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: Yes – Wildlife Site 43/52 and adjacent to 43/42, both grasslands.
Other features: Boundary hedgerows, grassland
Protected species: Bats generally in area

Opportunities: Retain boundary features, compensate for grassland loss if necessary. Area identified as high priority for habitat creation due to WS.
Ecological sensitivity: low / locally moderate;
Fundamental ecological constraint: Unlikely – Phase 1 survey to assess grassland. Buffer hedgerow with WS.

CD2 Codicote Garden Centre, High Street

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: No
Other features: Some hedgerow boundaries present.
Protected species: None likely
Opportunities: Community orchard on N half if left undeveloped.
Ecological sensitivity: negligible / low
Fundamental ecological constraint: Unlikely

CD3 Land north of The Close

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: No
Other features: Rank grass, scattered / dense scrub and hedgerow, locally valuable ecological and GI resource which needs assessment.
Protected species: Possible reptile interest – survey required.
Opportunities: GI retention and compensation grasslands if required.
Ecological sensitivity: low / locally moderate;
Fundamental ecological constraint: Unlikely

CD4 Land at Pulmore Water, St Albans Road

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: No
Other features: Limited boundary scrub. May develop some interest if vegetation develops prior to development.
Protected species: unlikely if site regularly disturbed.
Opportunities: Grasslands potential depending on extent of quarry works. Considered to be medium priority area.
Ecological sensitivity: low
Fundamental ecological constraint: Unlikely

Gravely

GR1 Land at Milksey Lane

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: No
Other features: Adjacent boundary trees and scrub. Grassland appears intensive horse paddock.
Protected species: No
Opportunities: Limited given size of site
Ecological sensitivity: low .
Fundamental ecological constraint: No.

Great Ashby and North East of Stevenage

GA1 Land at Roundwood

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: Yes **–** close to Tilekiln Wood and Parsonsgreen Wood Wildlife Site.
Other features: Adjacent woodland Round Wood, boundary scrub and rough grassland strips. . **Protected species:** No
Opportunities: Retention of boundaries and wildlife corridors across northern boundary.
Ecological sensitivity: low / locally moderate given proximity of woodlands.
Fundamental ecological constraint: No.

GA2 Land off Mendip Way

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: Yes – Tilekiln Wood, New Spring Wood, Brooches Wood Wildlife Sites, which will effectively be isolated by this development.
Other features: Boundary hedgerows, trees belts, scrub and possibly small area of rough grassland. General farmland ecology.
Protected species: Badger, hare and local bird species recorded. Bats at Tilekiln Farm – need to secure appropriate habitat resources maintained.
Opportunities: It is essential to ensure the **connectivity** between the woodlands and from the woodlands to open countryside is not destroyed. GI needs to be identified which retains viable corridors between these sites and to open countryside links beyond, given the increased pressure this will create on these WS and other existing habitat features. Identified as a high priority area for habitat creation.
Ecological sensitivity: medium / high given impact on woodlands.
Fundamental ecological constraint: Unlikely, but yes if sufficient corridors are not retained or created to reduce impact on woodlands.

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Hitchin

HT1 Land at Highover Farm

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: No
Other features: Remnant hedgerows, ruderal vegetation, pond, scattered trees. Possible old grassland if ridge and furrow.
Protected species: Reptile interest potentially present alongside railway.
Opportunities: GI associated with historic features, but likely to represent unacceptable constraint on development potential. Grassland compensation if assessment demonstrates value.
Ecological sensitivity: Moderate. Includes large area of v probable ridge and furrow grassland, likely improved but not ploughed, with other earthworks. Remnant hedge features and pond in addition to arable.
Fundamental ecological constraint: Needs phase 1 and species surveys – Great Crested newt and reptiles. .Grasslands may retain some interest.

HT2 Land north of Pound Farm

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: Yes - Folly alder Swamp WS to east;
Other features: Remnant hedgerows,
Protected species: Water vole on Ippollitts Brook – potential for increased pressure – GCN in pond to east?.
Opportunities: Limited – buffer river corridor to east. Assessed as high priority for habitat creation.
Ecological sensitivity: low / moderate – adjacent to WS;
Fundamental ecological constraint: No – but ensure river corridor to east is properly protected.

HT3 Land south of Oughtonhead Way

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: No
Other features: Remnant hedgerows, rough grassland
Protected species: Reptiles potentially present.
Opportunities: Retention of boundary features. Compensation for grassland if assessed as valuable - also adjacent to Oughton Head Lane Green Lane.
Ecological sensitivity: possibly moderate.
Fundamental ecological constraint: Phase 1 survey required to properly assess site as grasslands may retain some interest or species value.

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HT4 Land off Lucas Lane

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: No
Other features: Remnant boundary hedgerows
Protected species: Unlikely
Opportunities: River corridors, grassland and community orchards - historic features within Hitchin. Replacement trees and scrub where possible.
Ecological sensitivity: negligible **–** low, as intensive sports grassland unlikely to support significant interest
Fundamental ecological constraint: Unlikely. Some data on grassland to confirm lack of interest.

HT5 Land at junction of Grays Lane and Lucas lane

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: No
Other features: Remnant hedgerows and adjacent scrub
Protected species: Unlikely
Opportunities: Limited as small site – low priority for habitat creation.
Ecological sensitivity: low unless loss of grassland (no data) significant.
Fundamental ecological constraint: No

HT6 Land at junction of Grays Lane and Crow Furlong

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: No
Other features: Adjacent to woodland – loss of ruderal vegetation. Old orchard site but may be no surviving evidence. Boundary hedgerows.
Protected species: Reptile interest potentially present in places eg H/r28, H/r30.
Opportunities: River corridors, grassland and community orchards - historic features within Hitchin. Replacement trees and scrub where possible.
Ecological sensitivity: low if grassland loss of little interest (no data). Adjacent to woodland.
Fundamental ecological constraint: No, although grassland survey would confirm a lack of interest.

HT7 John Barker Place

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: No
Other features: Scattered formal trees and amenity grassland
Protected species: Unlikely
Opportunities: Limited due to size

Ecological sensitivity: negligible / low.
Fundamental ecological constraint: None apparent

HT8 Cooks Way

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: No
Other features: Adjacent to Walsworth Common and woodland / scrub
Protected species: Possible reptile interest associated with railway line.
Opportunities: Retention of adjacent scrub, otherwise unlikely as site to small
Ecological sensitivity: low to scrub

HT9 Centre for the Arts, Willian Road

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: Adjacent to Purwell Meadows Wildlife Site.
Other features: Few amenity trees and grassland – site almost wholly developed.
Protected species: Unlikely
Opportunities: Negligable given size of site.
Ecological sensitivity: low
Fundamental ecological constraint: No.

HE1 Wilbury Way

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: No
Other features: Largely fully developed – railway line adjacent to south-east.
Protected species: Reptile interest potentially present adjacent to railway if suitable habitat – unlikely.
Opportunities: None if site to remain essentially industrial
Ecological sensitivity: negligible
Fundamental ecological constraint: None apparent

HE2 & HB3 Burymead Road

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: No
Other features: None – site wholly developed.
Protected species: Unlikely
Opportunities: None likely
Ecological sensitivity: Negligible
Fundamental ecological constraint: None

HE3 Station approach

Recognised ecology sites within Site: Hitchin railway cutting – for lizards
Recognised sites adjacent / close to Site: Hitchin railway cutting – for lizards
Other features: Adjacent tree belts and scrub
Protected species: Reptiles (lizards and possibly slow worms)
Opportunities: Provision of appropriate habitat opportunities where possible
Ecological sensitivity: moderate depending on existing habitat suitability
Fundamental ecological constraint: Reptile surveys / advice needed if appropriate habitat present and affected.

HE4 & HB4 Land adjacent to Priory Park

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: No
Other features: Adjacent to formal parkland adjacent to River Hiz**.**
Protected species: Bats if buildings affected**.**
Opportunities: None as site too small.
Ecological sensitivity: negligible
Fundamental ecological constraint: none

Ickleford

IC1 Duncots Close

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: Cadwell Marsh and Burymead Springs WS to east, adjacent to R Hiz floodplain.
Other features: Scrub / hedgerows
Protected species: Otter recorded in river.
Opportunities: Limited due to small size of site. Retention of boundary features / habitats. Considered within high priority area for habitat conservation.
Ecological sensitivity: low? Survey required. Historic orchard site – grassland, GCN habitat may be present.
Fundamental ecological constraint: Highly unlikely. Survey required to confirm lack of interest, or inform requirement for compensation.

IC2 Burford Grange, Bedford Road

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: Oughton Head WS – close to R Oughton corridor.

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Other features: Scrub / hedgerows, rough grassland habitat present.
Protected species: Water voles recorded in river.
Opportunities: Limited due to small size of site. Retention of boundary hedgerows and trees
Ecological sensitivity: low / locally moderate. No data – requires survey for reliable assessment.
Fundamental ecological constraint: Unlikely. Phase 1 survey required to confirm lack of interest or inform any requirement for compensation.

Kimpton

KM1 Land off Hall Way

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Hedgerows, grassland; location for historic orchards, some older fruit trees may survive.
Protected species: Bats in general area – possible reptiles given allotment close by
Opportunities: Limited given small size of site – retention of boundaries. Low habitat creation potential.
Ecological sensitivity: low.
Fundamental ecological constraint: Unlikely – Phase 1 survey to confirm

KM2 Land off Lloyd Way

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Secondary woodland / hedgerows / ruderal vegetation
Protected species: Possible reptiles
Opportunities: Retention of boundary hedgerow / scrub. Woodland compensation if proposed area lost. High priority habitat creation area.
Ecological sensitivity: moderate / locally high. Lloyd Way Meadow (secondary woodland) will be lost, locally significant habitat in the context of Kimpton.
Fundamental ecological constraint: habitat should be surveyed (current application has submitted an ecological survey report) and compensated for if lost.

KM3 Land north of High Street

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features Adjacent hedgerows.

Protected species: Unlikely
Opportunities: Limited due to size off site – retention and enhancement of boundary features where present – new hedgerow along northern edge.
Ecological sensitivity: negligible / low
Fundamental ecological constraint: none likely

King's Walden

KW1 Land west of The Heath, Breachwood Green

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No
Other features: Allotments, boundary hedgerow and trees and small tree clump
Protected species: Reptiles possible in allotments. Dormouse recorded in close-by site
Opportunities: Limited due tom small site. Compensation for allotments; retention of boundary features.
Ecological sensitivity: low / locally moderate given loss of allotments and potential reptile interest.
Fundamental ecological constraint: allotments; reptile surveys required and compensation if justified.

Knebworth

KB1 Land at Deards End

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Large area of rough grassland; boundary hedgerows and pond.
Protected species: Possible reptile interest in grassland. Bats in general area
Opportunities: Retention of hedgerow features and GI potential. Compensation grassland if justified. Medium habitat creation potential.
Ecological sensitivity: Varies from negligible / low in arable areas to low / locally moderate due to rough grassland area with ?ancient hedge and pond. Possible ridge and furrow in arable field north of park lane – potential for arable weeds?
Fundamental ecological constraint: Grassland area requires Phase 1 survey to assess value, including pond.

KB2 Land off Gypsy Lane

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Arable; remnant hedgerows and scrub by A1.
Protected species: Unlikely other than casual foraging
Opportunities: Medium habitat creation potential – new hedgerows and community orchard depending on space. .
Ecological sensitivity: negligible - intensive arable. Gipsy La hedgerows should be protected.
Fundamental ecological constraint: None

Letchworth garden City

LG1 Land north of Letchworth

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Entirely arable; network of hedgerows, drainage ditches, rare arable weeds. There may be local bird interest associated with arable farmland.
Protected species: Reptiles (lizards) known. Great crested newts at Norton may be present if habitat suitable.
Opportunities: Arable weed compensation and provision for reptiles and GCN if present. GI within new development could include allotments and / or community orchard. Area within medium priority for habitat creation.
Ecological sensitivity: low
Fundamental ecological constraint: None apparent – protected species surveys required if habitats suitable.

LG2 Former George W.King site, Blackhorse Road

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Small area of apparent traditional orchard, recognised as Priority Habitat. Amenity grassland, scattered trees and hedgerow belt by road.
Protected species: Unlikely, depending upon habitat condition.
Opportunities: Retention of orchard and trees or compensate if lost.
Ecological sensitivity: negligible for most of site; locally moderate for orchard.
Fundamental ecological constraint: none apparent but compensation if orchard area lost.

LG3 Land east of Kristiansand way and Talbot Way

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.

Other features: Arable; rough grasslands and scrub belts to south east and north east boundaries.
Protected species: Lizards – associated with railway line.
Opportunities: Compensation should be required for loss of habitats. Medium priority habitat creation area.
Ecological sensitivity: generally low / locally moderate. Largely arable but significant edges of well established allotments, rough grassland and scrub. Reptile interest likely.
Fundamental ecological constraint: unlikely although compensation may be required for loss of scrub belts. Reptile surveys required.

LG4 Land north of former Norton School, Norton Road

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Rough grassland and boundary hedgerow.
Protected species: Possible reptile interest if habitat suitable.
Opportunities: Limited due to small size of site. Retain boundary features and compensation for loss of grassland habitat.
Ecological sensitivity: low / locally moderate given habitat condition;
Fundamental ecological constraint: None apparent but surveys required to assess value and potential for protected species.

LG5 Land at Birds Hill

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Scattered boundary trees, mainly along railway.
Protected species: Potential for reptiles associated with railway line.
Opportunities: None due to size, other than retain reptile habitat along railway line.
Ecological sensitivity: low
Fundamental ecological constraint: None apparent.

LG6 Land off Radburn Way

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Former orchard area dating from 1930s. Includes small open glade, adjacent to allotments. Old trees, some secondary woodland and scrub
Protected species: Potential for reptiles associated with allotments, and bats associated with some trees having splits and hollows etc.
Opportunities: Limited if site developed due to size. Compensation loss of what is traditional orchard Priority Habitat given high numbers of surviving fruit trees.

Ecological sensitivity: moderate / locally high
Fundamental ecological constraint: Yes – if site developed given local loss now that historic orchard site confirmed. Surveys are needed to properly assess site and any species interest.

LG7 Former Gates Garage Station Road

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Scrub / ruderal habitat adjacent to railway.
Protected species: reptile potential associated with railway line.
Opportunities: Little or none other than railway buffer strip.
Ecological sensitivity: negligible
Fundamental ecological constraint: None apparent

LG8 Pixmore Centre, Pixmore Avenue

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Small number of scattered amenity trees if within site.
Protected species: Unlikely.
Opportunities: None - site too small
Ecological sensitivity: negligible – site wholly developed.
Fundamental ecological constraint: No

LG9 Former Lannock School

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Amenity trees. Adjacent to open grassland of former school grounds.
Protected species: Unlikely unless bats associated with buildings which is of relatively low potential given modern design and build.
Opportunities: Little or none given size of site**.**
Ecological sensitivity: negligible
Fundamental ecological constraint: No

LG10 Former playing field, Croft Lane

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Grasslands may be on former ridge and furrow and could be of interest. Some areas may be more rank than others, providing further species interest. Boundary scrub and at east end, and ruderal habitat.

Protected species: Possible Great crested newt presence depending on habitat condition.
Opportunities: If grassland shown to be of interest, compensation should be required for loss if developed. GI may be limited given size of site
Ecological sensitivity: low? Possible GCN habitat. Hedgerows / trees around edge. Grassland unlikely to be of interest but requires survey.
Fundamental ecological constraint: Not apparent unless grassland shown to be valuable in which case some offsetting may be required.

LG11 Garden Square shopping centre

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Entirely developed.
Protected species: no
Opportunities: None
Ecological sensitivity: Negligible
Fundamental ecological constraint: No

LG12 Former power station, Works Road

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Boundary scrub and hedgerows. Ruderal vegetation likely if remains a typical brownfield undeveloped site.
Protected species: Reptiles possible from railway.
Opportunities: Very limited - site too small
Ecological sensitivity: negligible – depending on current condition
Fundamental ecological constraint: Reptile surveys may be required depending upon habitat condition.

LE1 Works Road

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: Yes – Icknield Way railway bank Wildlife Site for lizards
Other features: Scattered boundary features within site and on external edges.
Protected species: Unlikely – possibile reptile interest adjacent to railway depending on habitat availability.
Opportunities: GI if any areas redeveloped.
Ecological sensitivity: negligible – site wholly developed.
Fundamental ecological constraint: No

LE2 & LB2 Blackhorse Road (and north)

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: Yes – Icknield Way railway bank Wildlife Site for lizards
Other features: NW and NE edge scrub / ruderal belts; other boundary features, scattered trees and amenity grassland within site.
Protected species: Unlikely other than reptiles if habitat suitable by railway.
Opportunities: Limited as site relatively small – develop GI.
Ecological sensitivity: negligible (other than reptile potential) – site wholly developed.
Fundamental ecological constraint: No

LE3, LB3 and LB4 Icknield Way (and north and south)

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: Yes – Norton common Wildlife Site .
Other features: Railway edge scrub and scattered boundary scrub elsewhere
Protected species: Reptiles possible if habitats suitable adjacent to railway.
Opportunities: GI depending on opportunities if redeveloped.
Ecological sensitivity: negligible – site wholly developed.
Fundamental ecological constraint: No

LE4 &LB5 Spirella

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: Yes – Norton Common Wildlife Site.
Other features: Tree belt adjacent to railway. Scattered boundary trees and scrub around edges and garden. Amenity grassland.
Protected species: Unlikely unless reptiles associated with railway.
Opportunities: Limited - site small but could include GI
Ecological sensitivity: negligible – site wholly developed.
Fundamental ecological constraint: No

Offley

OF1 Former allotments, Luton road

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Boundary trees and hedgerow, rough grassland / ruderal area to NE on historic orchard site
Protected species: Potential reptiles.
Opportunities: GI
Ecological sensitivity: low / locally moderate depending on any reptile presence - survey required.

Fundamental ecological constraint: None apparent, pending protected spp surveys and advice.

Pirton

PT1 Land east of Priors Hill

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: No
Other features: Boundary hedgerows
Protected species: Within Great Crested Newt zone but habitat may not be suitable to provide shelter.
Opportunities: Retain hedgerows; GI. Considered medium opportunity habitat creation area. Community orchard given historic orchards in village.
Ecological sensitivity: low. If grassland, may retain some interest – if so requires survey to confirm.
Fundamental ecological constraint: None. Dividing hedge may be Important if follows historic field pattern.

PT2 Holwell Turn, West Lane

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: No
Other features: Boundary hedgerow
Protected species: Within edge of GCN zone but land use likely to preclude presence.
Opportunities: Retain hedgerows; community orchard. Considered medium opportunity habitat creation area.
Ecological sensitivity: Negligible / low - arable
Fundamental ecological constraint: Highly unlikely

Preston

PR1 Land off Templars Lane

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Boundary hedgerows – otherwise improved / heavily grazed disturbed grassland.
Protected species: Unlikely, depending on nature of grassland if left in future.
Opportunities: Considered to be in a high priority area for habitat creation
Ecological sensitivity: low
Fundamental ecological constraint: None apparent

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Reed

RD1 Land at Blacksmiths lane

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Hedgerows and dense bramble patches in rough grassland. Site adjacent to rough grassland / scrub
Protected species: Potential reptile interest.
Opportunities: Community orchards as part of GI – historically present. Retention of boundary features. Medium priority for habitat creation
Ecological sensitivity: potentially low. Rough grassland and hedgerows – surveys required to confirm
Fundamental ecological constraint: None apparent depending on new survey information

RD2 Farmyard, Brickyard Lane

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Pond, ruderal / bramble patches, disturbed ground. Some boundary scrub.
Protected species: Potential for reptile interest
Opportunities: Limited given size of site.
Ecological sensitivity: low, other than any reptile interest.
Fundamental ecological constraint: None apparent.

Royston

RY1 Land west of Ivy Farm, Baldock Road

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: Yes – Therfield Heath SSSI; Icknield Way Wildlife Site
Other features: Boundary tree belts, loss of improved grassland
Protected species: Lizards a feature of the N edge of the town and railway – need to be surveyed.
Opportunities: Retention of roadside trees; buffer with railway. Within high priority area for habitat creation.
Ecological sensitivity: High due to increased pressure on SSSI.
Fundamental ecological constraint: Yes - site should not be considered unless suitable mitigation / compensation measures are provided to demonstrate impact on SSSI will be limited. Local lizard populations will require surveying and translocation where necessary.

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RY2 Land north of Newmmarket Road

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Tree belts – otherwise arable.
Protected species: Reptiles likely to be a feature of the A505 roadside and cutting.
Opportunities: Chalk grasslands on section not to be developed; within medium / high priority areas for habitat creation. Buffer to A505
Ecological sensitivity: low. Roadside trees and tree clump (A505 & Newmarket Road) should be retained.
Fundamental ecological constraint: Local lizard populations will require surveying and translocation where necessary. Local tree belts retained where possible – important as corridors into urban area.

RY3 Land off Burns Road

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Loss of rough grasslands, tree belts.
Protected species: Reptiles (lizards) a feature – dealt with as part of current development.
Opportunities: GI and roadside buffers. Medium habitat creation priority area.
Ecological sensitivity: low – lizards dealt with.
Fundamental ecological constraint: None apparent. Local lizard populations will require surveying and translocation where necessary.

RY4 Land north of Lindsay Close

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Loss of rough grasslands (ex arable), tree belts, A505 verge.
Protected species: Lizards a feature
Opportunities: GI; retention of tree belts as corridors into town. Medium habitat creation priority area.
Ecological sensitivity: low
Fundamental ecological constraint: None apparent; Local lizard populations will require surveying and translocation where necessary. Local tree belts retained where possible.

RY5 Agricultural supplier, Garden Walk

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.

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Other features: Boundary tree belts and scrub to be retained.
Protected species: Unlikely given location – reptiles a low possibility
Opportunities: Retention of boundary features.
Ecological sensitivity: low
Fundamental ecological constraint: Local lizard populations will require surveying and translocation where necessary. Local tree belts retained where possible – important as corridors in urban area. Rough grasslands may be of local value – compensate if necessary.

RY6 Royston Football Club

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Boundary trees.
Protected species: Highly unlikely
Opportunities: Retention of boundary vegetation
Ecological sensitivity: negligible
Fundamental ecological constraint: No

RY7 Anglian Business Park, Orchard Road

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Scattered trees, ruderal and rough grassland adjacent to railway.
Protected species: Reptiles potentially present in area by railway if still present.
Opportunities: Retention of railway edge.
Ecological sensitivity: negligible (low if habitat patch by railway still present)
Fundamental ecological constraint: Highly unlikely

RY8 Land at Lumen road

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Trees and scrub
Protected species: unlikely to be an issue depending on habitat – cemetery close by has potential.
Opportunities: Retention of trees
Ecological sensitivity: low
Fundamental ecological constraint: None, although trees locally valuable to site.

RY9 Land north of York Way

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Majority former (or existing) arable, grassland to east may be of interest. Scrub and roadside verges.
Protected species: Reptiles likely along roadside verge (A505).
Opportunities: Retain existing green corridors along A505 and York Way. Compensation for grassland if of sufficient interest. Within area of medium priority for habitat creation.
Ecological sensitivity: low – locally moderate
Fundamental ecological constraint: Local lizard populations will require surveying and translocation where necessary. Phase 1 survey to assess grassland and determine compensation.

RE1 Orchard Road

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Tree clump in SW corner
Protected species: Highly unlikely given wholly developed nature of area.
Opportunities: limited due to nature and use of the site unless redevelopment provides GI opportunities – e.g. green roofs.
Ecological sensitivity: negligible
Fundamental ecological constraint: none likely

St Ippolyts

SI1 Land south of Waterdell Lane

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: St Ibbs Bush Wildlife Site to south.
Other features: Boundary hedgerows. Parkland to south
Protected species: Low potential within site; adjacent site important for bats
Opportunities: Retention of hedgerows and potential for GI. Within low priority habitat creation area.
Ecological sensitivity: low / locally moderate given adjacent parkland.
Fundamental ecological constraint: None apparent but due regard given to adjacent site to south

SI2 Land south of Stevenage Road

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: Yes - Wymondley Transforming Station WS
Other features: Boundary scrub and rough grassland
Protected species: Potential for reptiles

Opportunities: Retention of boundary features. Within high priority habitat creation area. Habitat survey required to determine any grassland interest.
Ecological sensitivity: Low. Rough grassland, scrub and trees, roadside hedge - needs survey for assessment.
Fundamental ecological constraint: Unlikely but habitats need surveying to determine whether compensation needed.

St Paul's Walden

SP1 Land south of High Street, Whitwell

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: Rose Farm meadows Wildlife Site north of Codicote Road – impact unlikely.
Other features: Rough grassland, hedgerows and tree belt.
Protected species: Potential for reptiles.
Opportunities: Retention of hedgerows. Adjacent to area of low opportunity for habitat creation.
Ecological sensitivity: low, but small parcel of rough grass needs Phase 1 survey to assess any habitat / protected species value. Adjacent hedgerows.
Fundamental ecological constraint: None apparent. Limited impact of disturbance on adjacent grassland where skylarks reported.

Stevenage North

NS1 North of Stevenage (in Gravely parish)

Recognised ecology sites within Site:.Yes - a thin strip of Ledgeside Plantation Wildlife Site along the SW side of Back Lane.
Recognised sites adjacent / close to Site: Ledgeside Plantation Wildlife Site NE of Back Lane.
Other features: limited - whole site is managed as intensive arable with small area of recent shrub planting and grassland (for game?) with remnant hedgerows / boundary features.
Protected species: Possible reptiles in grassland / field boundaries if habitat suitable.
Opportunities:.Any GI – retention and enhancement of remnant boundary features to provide wildlife corridors, buffering of Ten Acre Plantation. Area incorporates high, medium and low priority areas for habitat creation.
Ecological sensitivity: low
Fundamental ecological constraint:. None apparent

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Therfield

TH1 Land at Police Row

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Grassland and boundary hedgerows
Protected species: Great crested newts in area.
Opportunities: Area with former orchards – community orchard potential as part of GI provision.
Ecological sensitivity: low, but grassland requires survey to assess interest. Within GCN zone although heavy grazing would reduce likelihood of habitable site.
Fundamental ecological constraint: None apparent. Boundary hedgerows should be retained – internal hedgerows already lost or degraded.

TH2 Land south of Kelshall Road

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Hedgerows, rough grassland edges
Protected species: Great crested newts in area – potential for reptiles if habitat suitable.
Opportunities: Limited given small size of site; retention of boundary hedgerows.
Ecological sensitivity: low
Fundamental ecological constraint: None apparent – protected species may need considering

Weston

WE1 Land off Hitchin Road

Recognised ecology sites within Site: No.
Recognised sites adjacent / close to Site: No.
Other features: Hedgerows, what appears heavily grazed grassland, tree belts
Protected species: Great crested newts in area – potential for reptiles if habitat suitable. If heavy horse grazing, unlikely.
Opportunities: Limited given small size of site; retention of boundary features, particularly by Htichin Road. Adjacent to area of high priority for habitat creation.
Ecological sensitivity: low – grassland requires survey to assess value, unlikely to be high.
Fundamental ecological constraint: None apparent – protected species may need considering.

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Wymondley

WY1 Land south of Little Wymondley

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: No
Other features: Old countryside of small rough grassland fields and well established hedgerow complex – historic orchard sites. Woodland and scrub. May include remnant ridge and furrow, suggesting older grasslands?
Protected species: Bats generally – potential for reptiles if habitat suitable.
Opportunities: Retention of hedgerow network. Community orchards as part of GI. Considered generally to be of lower priority for habitat creation.
Ecological sensitivity: locally moderate due to nature of area. Requires Phase 1 survey to assess grasslands and hedgerows. Should not be progressed unless offsetting provided to maintain landscape habitat features.
Fundamental ecological constraint: Yes, unless impacts overcome. Hedgerows should be protected as far as possible – locally rich and significant resource of grasslands and hedgerows in village, offsetting required if lost.

Chapter 12 Part ll
Development for wider needs of Luton housing market area
Cockernhoe & East of Luton

EL1 Wandon Park
EL2 Wandon Park extension
EL3 Land west of Cockernhoe

Recognised ecology sites within Site: No
Recognised sites adjacent / close to Site: Yes – Stubbocks Wood WS to NE
Other features: Area largely arable; scattered hedgerows and tree belts. Adjacent to woodland plantations**.**
Protected species: Potential for bats generally although relatively poor habitat overall.
Opportunities: Retention and enhancement of hedgerow network to provide corridors, especially adjacent to existing urban area. Largely lower priority area for habitat creation
Ecological sensitivity: low
Fundamental ecological constraint: None apparent given intensive farmed use.

Chapter 12 Part lll Reserved sites for future needs
West of the A1(M) at Stevenage

WS1 West of Stevenage

This area contains a number of Wildlife Sites – **Lucas Wood** in the very north, and **Upper Kitching Spring** in the very south. The development area lies immediately adjacent to part of **Knebworth Woods SSSI** – both the old Green Lane section and Burleigh Meadow, the latter one of the most valuable neutral grassland sites in the county and highly sensitive to disturbance and management issues. Otherwise the majority of the area is intensive arable, largely open with few hedgerows, with a few small areas of grassland around Almshoe Bury and Lucas Wood. The hedgerow adjacent to the old Roman Road is known to be species rich and likely to be ancient. The southern area overlaps a little with potential Great crested newt zones, although these may not be a major issue given the current land use.

The thin extension south for potential development lacks a sensible pattern for such 'ribbon development' when the existing land use / land form does not in lend itself to this approach. It is barely 100 m wide near High Broomin Wood and the proposed fields are otherwise set within a very open area. Furthermore this approach to development will also increase residual impacts on the SSSI and associated features. However it is recognised that any development here would only proceed if land to the east within Stevenage was also developed which would also result in an increased impact overall.

Whilst there would not appear to be any significant ecological constraint on development in parts of this area, the **local impact would be high** given the sensitivities of the SSSI. Again the ecology of arable farmland will be lost, although such aspects would have been considered as part of the original west of Stevenage proposals. As I understand, no fundamental constraints were apparent from any of the studies and mitigation was proposed for what particular interests were found to be present (primarily farmland birds). However, there was no guarantee that any landowners could be identified to undertake appropriate management activities that would be needed to compensate for these species.

The proposal site has **medium ecological impact overall** although the Wildlife Sites MUST be protected and enhanced and offsetting provided for farmland bird species. I see no merits in the southern extension given the impacts this could have on WS and the SSSI and I think this would far better represent largely if not entirely some form of Green Infrastructure. Area considered for low, medium and high habitat creation potential, higher areas being around Wildlife Sites and SSSI.

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I trust these comments are of assistance in considering the Local Plan.

Regards,

Martin hicks
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Providing ecological advice to Hertfordshire's Local Authorities and communities

HERTFORDSHIRE ECOLOGY

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ASHWELL

301

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: yes, Local Wildlife Site - Ducklake Farm, Ashwell, to the west.

Other features: rough grassland with tall ruderal vegetation.

Protected species: Bats roosting nearby.

Opportunities: retention of hedgerows - GI boundaries; compensation for loss of rough grassland if developed / lost.

Ecological sensitivity: low - medium at local level given its semi-natural habitats.

Fundamental ecological constraint: none.

302

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: rough grassland.

Protected species: unlikely.

Opportunities: retention of hedgerows - GI boundaries.

Ecological sensitivity: low.

Fundamental ecological constraint: None.

303

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: patchy (cut) grassland.

Protected species: unlikely.

Opportunities: retention of hedgerows - GI boundaries.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

304

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: improved grassland.

Protected species: unlikely.

Opportunities: retention of hedgerows - GI boundaries.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

305

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: rough grassland with scattered and bordering mature trees.

Protected species: bat roost adjacent – may forage / disperse across site.

Opportunities: retention of hedgerows - GI boundaries.

Ecological sensitivity: low.

Fundamental ecological constraint: potentially nesting birds; possibly roosting bats.

306

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: largely developed site (caravan site) with hardstanding and amenity grassland. Bordering hedgerows and plantation strip on two sides.

Protected species: unlikely.

Opportunities: retention of hedgerows - GI boundaries.

Ecological sensitivity: low.

Fundamental ecological constraint: Preliminary ecological assessment of plantation; potentially nesting birds.

BALDOCK

307

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: none - largely developed site.

Protected species: bat potential.

Opportunities: Limited – wholly developed site.

Ecological sensitivity: negligible**.**

Fundamental ecological constraint: bat assessment of buildings advised.

BARKWAY

308

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: part of golf course: short amenity grassland, rough grassland, scattered scrub, ditch/drain on southern edge.

Protected species: Badgers; reptile potential in rough grass / tall vegetation.

Opportunities: moderate. Compensation for loss of rough grassland if developed / lost.

Ecological sensitivity: medium, due to size of site; and it is wholly semi-natural habitat. Notable White-letter Hairstreak butterflies in bordering hedgerows – these feed solely on elm, therefore retain elm.

Fundamental ecological constraint: Badger and reptile assessments advised.

BARLEY

309

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: locally important (ecologically) banks of Barley green lane to the north.

Other features: rough grassland.

Protected species: unlikely.

Opportunities: retention of hedgerows, especially northern boundary which abuts a significant bank feature. - GI boundaries.

Ecological sensitivity: low.

Fundamental ecological constraint: none apart from potential nesting birds.

310

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: scrub. Abuts with old hedgerow.

Protected species: potential for reptiles and nesting birds.

Opportunities: retention of some scrub - GI boundaries.

Ecological sensitivity: low-medium as may lose reptile habitat.

Fundamental ecological constraint: advise assessment for reptiles.

CODICOTE (POTTERSHEATH0

311

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: within 75m of Mardley Heath Local Nature Reserve (LNR) and Local Wildlife Site, however separated by A1(M) motorway.

Other features: Pond Plantation – plantation, possibly some secondary woodland, pond.

Protected species: potential nesting birds.

Opportunities: retention of trees around the edge, particularly the northern edge which borders part of Ninings Wood – a Local Wildlife Site and Ancient Woodland Inventory site. This will act as a buffer to any proposed development, and provide GI boundaries.

Ecological sensitivity: locally medium with loss of trees. Also may lose bird nesting habitat.

Fundamental ecological constraint: advise preliminary ecological assessment to determine ecological interest.

CODICOTE

312

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: rough grassland, tall vegetation, scattered scrub.

Protected species: potential reptiles.

Opportunities: retention of hedgerows, plant up gaps - GI boundaries.

Ecological sensitivity: low – locally medium as large area of rough grassland.

Fundamental ecological constraint: advise preliminary ecological assessment, including for reptiles, to determine ecological interest.

313

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: within 50m of Heath Plantation Local Wildlife Site, however separated by Heath Lane / Heath Hill roads.

Other features: the majority of the site is improved, cut, grassland divided by gappy hedgerows. The north-west section appears to be a large residential plot with house and associated buildings; however there are substantial broadleaf tree lines / wooded belts bordering and dissecting this area.

Protected species: Bats are in the area. Potential for roosting bats and nesting birds.

Opportunities: Large given size of site and within high priority habitat creation area. Retention of mature trees / woodland in the north-west section, and buffer this from any proposed development. Retention of hedgerows and plant up gaps - GI boundaries.

Ecological sensitivity: locally medium with loss of trees. Also may lose bird nesting and/or bat roosting habitat.

Fundamental ecological constraint: advise preliminary ecological assessment to determine ecological interest.

314

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: within 15m of St Giles Churchyard Local Wildlife Site, however separated by Bury Lane.

Other features: improved grassland.

Protected species: unlikely.

Opportunities: limited due to nature and use of site. Medium habitat creation priority area.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

315

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: improved grassland.

Protected species: none.

Opportunities: Medium habitat creation priority area.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

316

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: improved grassland.

Protected species: none.

Opportunities: Medium habitat creation priority area.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

317

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: improved grassland.

Protected species: none.

Opportunities: Medium habitat creation priority area.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

318

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: adjacent to Longston and Catchpole Local Wildlife Site.

Other features: a large part of the site is improved (grazed) grassland with some reasonable hedgerows. The southern field (bordered by Catchpole Wood) was once thought to be unimproved grassland meadow, but since at least 1996 it appears to be species-poor semi-improved grassland (but unsprayed). The northern part includes a large residential plot with house9s0 and associated buildings / barns, amenity grassland and planting.

Protected species: potential for bats in buildings.

Opportunities: Low - medium habitat creation priority area. Retention of hedgerows - GI boundaries.

Ecological sensitivity: low.

Fundamental ecological constraint: advise bat assessment of buildings.

GRAVELEY

319

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: partly arable field and partly rough grassland. Borders broadleaf woodland on north-east and north-west sides.

Protected species: Badgers in the area.

Opportunities: High habitat creation priority area. Buffer adjacent woodland blocks.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

320

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: close to small part of Ledgeside Plantation Local Wildlife Site.

Other features: Largely arable field, but also includes Ten Acre Plantation. There are a few single trees within field.

Protected species: Badgers in the area. Potential for nesting birds in trees.

Opportunities: Medium habitat creation priority area. Buffer plantation against development.

Ecological sensitivity: field low, woodland locally moderate. Avoid development within woodland if possible, or compensation for tree loss with native planting.

Fundamental ecological constraint: advise preliminary ecological assessment to determine ecological interest.

321

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: large area of rough grassland with copses and scattered trees. Hedgerow on western boundary.

Protected species: Badgers in the area.

Opportunities: Medium habitat creation priority area. Buffer against adjacent plantations to the south, east and north-west. Retention of hedgerow(s) - GI boundaries.

Ecological sensitivity: low – locally moderate depending on survey results.

Fundamental ecological constraint: advise preliminary ecological assessment to determine ecological interest.

322

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: within 50m of small part of Ledgeside Plantation Local Wildlife Site.

Other features: arable field. Bordered to north-west and south-east by broadleaf woodland belts. Single tree within field.

Protected species: Badgers in the area.

Opportunities: High habitat creation priority area. Buffer adjacent woodland belts.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

GREAT ASHBY / WESTON

323

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: mainly arable fields with two woodland blocks (Nine Acre Spring and Longdell Wood); improved grassland field with a small wooded dell. Some hedgerows.

Protected species: bats in the area. Potential for nesting birds. Hazel dormouse and badgers known to be in the area.

Opportunities: High habitat creation priority area. Avoid impact to woodlands if possible; if not then compensate for loss of trees with native planting. Buffer woodland blocks if they are retained. Plant up gappy hedgerows - GI boundaries.

Ecological sensitivity: fields low; potentially high if Hazel dormouse present.

Fundamental ecological constraint: dormouse assessment of suitable habitats. Badger assessment,

HITCHIN

324

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: improved grassland with occasional scattered trees. Bordered on all four sides by thick, mixed hedgerows. Southern part of site has a wooded dell. Some buildings within the site boundary.

Protected species: Bats foraging and roosting on site. Potential for nesting birds.

Opportunities: Retain trees if possible, or compensate for any loss with native planting. Retention of hedgerows - GI boundaries.

Ecological sensitivity: grassland - low; trees- potentially higher.

Fundamental ecological constraint: advise bat assessment.

325

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: property with grounds: broadleaf woodland and amenity (?) grassland. Building with bat roost on site. Bordered to the north by River Oughton.

Protected species: Bats roosting on site. Potential for nesting birds.

Opportunities: Medium habitat creation priority area. Retain trees if possible, or compensate for any loss with native planting. Buffer river and margin habitat.

Ecological sensitivity: low – medium depending if trees removed. Nesting birds.

Fundamental ecological constraint: advise bat assessment.

326

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: eastern boundary is adjacent to Stotfold Road Verges Local Wildlife Site.

Other features: arable. Wooded banks of railway on north-west side. Gappy or non-existent hedgerow elsewhere.

Protected species: none.

Opportunities: Medium habitat creation priority area. Buffer LWS road verges on eastern edge.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

HOLWELL

327

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: residential plot with two houses and associated buildings, hardstanding. Amenity garden and planting.

Protected species: none.

Opportunities: Low habitat creation priority area. Limited due to nature of site.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

328

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: rough grassland with scattered trees / scrub.

Protected species: Potential for nesting birds.

Opportunities: High habitat creation priority area. Retain trees if possible, or compensate for loss with native planting.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

ICKLEFORD

329

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: adjacent to part of Upper Green, Ickleford Village Green.

Other features: woodland / scrub. Some buildings within the site boundary.

Protected species: Potential for nesting birds, possibly roosting bats.

Opportunities: Medium habitat creation priority area. Retain as many trees as possible, or compensate for loss with native planting. Buffer boundary with wooded edge - - GI boundaries.

Ecological sensitivity: Notable White-letter Hairstreak butterflies nearby – these feed solely on elm, therefore retain elm.

Fundamental ecological constraint: advise bat assessment.

330

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: mixed habitats including arable field, improved and rough grassland, residential plots with houses / buildings and amenity gardens. Some hedgerows, scattered and clustered trees.

Protected species: Potential for roosting bats and nesting birds.

Opportunities: Medium habitat creation priority area. Retain trees if possible, or compensate for loss with native planting. Add or maintains hedgerows - - GI boundaries.

Ecological sensitivity: low – depending on survey results.

Fundamental ecological constraint: advise preliminary ecological assessment to determine ecological interest.

ICKLEFORD (LOWER STONDON)

331

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: mixed habits: largely arable field, with area of cut grassland, section of woodland dismantled railway, trees / scrub, drain, part of moat.

Protected species: potential for nesting birds, roosting bats.

Opportunities: Low to medium habitat creation priority area. Buffer wooded dismantled railway banks.

Ecological sensitivity: low – medium depending on survey results.

Fundamental ecological constraint: advise preliminary ecological assessment to determine ecological interest.

KINGS WALDEN (BREACHWOOD GREEN)

332

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: amenity grassland (residential garden plot).

Protected species: none.

Opportunities: Limited due to nature of site

Ecological sensitivity: low.

Fundamental ecological constraint: none.

333

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: two (semi?) improved grazed grassland fields bordered by hedgerows.

Protected species: bats in the area.

Opportunities: Limited. Retention of hedgerow(s) - GI boundaries.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

KNEBWORTH

334

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: improved grassland. Adjacent to Cowpasture Wood, broadleaf woodland of local value. Hedgerow along southern boundary.

Protected species: none.

Opportunities: Limited. Buffer against woodland to the north.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

335

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: grounds of residential plot - amenity grassland with tennis court and horse manege and associated barn / outbuilding.

Protected species: unlikely.

Opportunities: Medium habitat creation priority area.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

336

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: arable.

Protected species: bats nearby.

Opportunities: Medium habitat creation priority area.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

LETCHWORTH

337

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: developed site – building (Freeman House) and hardstanding; some bordering amenity grassland and trees / scrub.

Protected species: Potential for nesting birds.

Opportunities: Limited due to nature of site. Retain tree belt along western edge

Ecological sensitivity: low.

338

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: developed site – units and hardstanding; possibly some bordering vegetation.

Protected species: none.

Opportunities: Limited due to nature of site.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

339

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: developed site – units and hardstanding; possibly some bordering vegetation – mature trees bordering Glebe Road

Protected species: Potential for nesting birds.

Opportunities: Limited due to nature of site.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

OFFLEY (EAST OF LUTON)

340

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: adjacent to Cockernhoe Green Village Green.

Other features: residential plot with amenity grassland and planting.

Protected species: Potential for nesting birds.

Opportunities: Low habitat creation priority area.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

341

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: arable. Western part of site is not in Hertfordshire.

Protected species: none.

Opportunities: Low habitat creation priority area.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

OFFLEY

342

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: yes – north-eastern tip is adjacent to Offley Chalk Banks, Offley Park Local Wildlife Site and Old Road Plantation/New Plantation Local Wildlife Site.

Other features: semi-improved grassland.

Protected species: none.

Opportunities: Buffer adjacent Local Wildlife Sites.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

PIRTON

343

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: semi-improved cut grassland with one tree and some scrub. Bordered by hedgerows.

Protected species: none.

Opportunities: Retain hedgerows – GI boundaries.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

344

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: semi-improved grassland.

Protected species: bats in the area,

Opportunities: Medium habitat creation priority area.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

ROYSTON

345

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: arable.

Protected species: none.

Opportunities: High habitat creation priority area.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

346

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: arable. Bordered on all sides by woodland (blocks or strips).

Protected species: none.

Opportunities: High habitat creation priority area. Retain hedgerows – GI boundaries. Buffer boundaries.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

ST IPPOLYTS

347

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: poor semi-improved grassland. Hedgerow on three sides of four.

Protected species: none.

Opportunities: Limited. Retain hedgerows – GI boundaries; buffer eastern and southern boundaries.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

ST PAUL'S WALDEN (WHITWELL)

348

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: arable.

Protected species: none.

Opportunities: Low habitat creation priority area.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

349

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: yes – adjacent to Rose Farm Meadows Local Wildlife Site.

Other features: residential plot with amenity grassland and planting, Rose Farm (house and outbuildings), hardstanding. Rive Mimram borders the site to the north.

Protected species: Potential for roosting bats and/or nesting birds.

Opportunities: high habitat creation priority area. Buffer adjacent LWS.

Ecological sensitivity: low.

Fundamental ecological constraint: advise bat assessment.

THEFIELD / KELSHALL

350

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: adjacent to part of Icknield Way, A505 North of Gallows Hill Local Wildlife Site.

Other features: semi-improved grassland field separated by hedgerows. Woodland area bordering A505 to the north-west; Properties with amenity grassland and planting.

Protected species: Lizards in the area. Potential for roosting bays?

Opportunities: Retain hedgerows for GI boundaries.

Ecological sensitivity: low.

Fundamental ecological constraint: Consider bat assessment.

WESTON

351

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: semi-improved rough grassland. Bordered by hedgerows on all sides.

Protected species: none.

Opportunities: Retain hedgerows - GI boundaries.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

352

Recognised ecology sites within Site: no.

Recognised sites adjacent / close to Site: no.

Other features: improved grassland. Mature boundary on western edge.

Protected species: none.

Opportunities: high habitat creation priority area. Retain hedgerows for GI boundaries.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

Anita Parry 26 January 2016