

HERTS AND MIDDLESEX BADGER GROUP NHDC HEARING STATEMENTS

1. ICKLEFORD

Herts & Middlesex Badger Group HMBG have surveyed the area of the proposed developments in and around Ickleford and have found a badger sett, latrines as well as foraging 'snuffle holes'.

We would request that if planning is granted the badger group would be allowed to re-survey the areas affected and that the statutory requirements for badger mitigation provided.

We are sure you are aware of the legal requirements for badger mitigation, but this is a useful link all

<https://www.gov.uk/guidance/badgers-surveys-and-mitigation-for-development-projects>

We would be able to direct ecological surveyors to the areas which contain one new hole with spoil heap, 2 further holes in scrubland, fresh latrines and snuffle holes within the development area.

Please note that our sett records are lodged with Herts and Middlesex Wildlife Trust records department and the County recorder and information can be obtained in appropriate circumstances.

2. East of Luton (Cockenhoe Area)

Following surveys, we have found evidence of badgers on the development site East of Luton. Before any

developments commence, the badger activity will need to be monitored with a full survey carried out again in during 2018. We have grid references available for two

currently inactive badger setts and two active outlier holes, two fresh latrines in the North part of Brick Kiln Wood and three latrines found in South part of Brick Kiln Wood. There was a network of badger paths between these two areas, showing recent and ongoing badger activity.

North Stevenage /NS1

The sett we surveyed near Rook's Nest Farm, near to NS1 is very active with fresh latrines in the hedgerows. There was evidence that the area is used as a foraging ground with badger activity found on the border of the North Herts NS1 development area and the SBC development. We have been advised that there has been a late representation for a development at Chesterfield Park, which would have serious implications for the badgers in this area. It would take away the wildlife corridor necessary for interaction between setts and/or bring badgers into the development.

3. GA1/GA2

This is an area which is rich in wildlife including badgers, so we have extensively surveyed these areas GA2, particular is our major development concern regarding its local badger population as well as having the potential to result in a catastrophic loss in biodiversity in the area. We have contacted the Badger Trust to highlight our concerns, regarding these particular badger setts and they have expressed a similar degree of concern to our own.

Loss of green belt has already affected badger populations, in the area eg the sett in nearby Hanging Bois Wood is now disused. RTCs and disturbances also have resulted in setts being lost around Stevenage, despite existing legislative protection.

GA2 contains a extensive mixed woodland within the green belt with considerable badger activity with access to other setts which has led to healthy and active badger population. Part of the suitability of the area for badgers is that it also consists of small fields divided up by priority hedgerows which is ideal habitat for cover and foraging. There are five thriving setts within the woodland and one in the adjacent field. (Sett records are available). Further active setts lie along the hedgerows and footpaths with outliers within the fields. Well used badger paths cross the area between the setts and there are numerous latrine areas, showing a large badger population.

If this area was to be developed, there would need to be artificial setts built which would need to be properly monitored for the displaced badgers. Licenses would need to be obtained from Natural England to close the existing badger setts for the area to be built on. However, as there are so many that would need to be closed, it would be hard to relocate them as the suitable area around GA2 also have large badger populations already. For instance, to the SE of the Newbury Grove and GA2 areas there are other large active badger clans and it is not legal to relocate badgers to other badger territories. There would be detailed studies involving bait marking needed to ascertain where they could go, which should really have been considered already. In our view, the absence of badger mitigation strategies would make the development unworkable as the land to the N and NE of GA2, the habitat is large open fields and not suitable to sustain such a large badger population. Govt standing orders are that a) You can't translocate badgers for a development project. B) You're breaking the law if you intentionally capture, kill or injure a badger and you could be prosecuted and fined

Since this development was suggested it has been extended, totally ignoring our initial complaints, from November 2016 and suggestions of a workable wildlife corridor, so that currently we cannot see how this could possibly be considered a deliverable plan. There has been no evidence of detailed ecological studies nor understanding of badger mitigation requirements and we would ask that this development does not go ahead at all. Our view is supported by this from the National Planning Policy Framework

118. When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles: ● if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; ●

Also

● the following wildlife sites should be given the same protection as European sites: – potential Special Protection Areas and possible Special Areas of Conservation;

Surely, most of GA2 should be considered a wildlife special protection area? The loss of other areas of habitat has meant that there is higher than average populations of badgers within the area and there is nowhere to move them too, without significant harm. As a badger group, we are very concerned that should GA2 go ahead, it will result in a severe loss to biodiversity and a protected species, too.

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Chair

Herts & Middlesex Badger Group

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