

**Allocation Site RY1: Land west
of Ivy Farm, Baldock Road**

Recreational impacts on Therfield
Heath Site of Special Scientific
Interest (SSSI)

September 2016

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1 Introduction

Background to commission

- 1.1 The North Hertfordshire District Council Local Plan Preferred Options Consultation Paper (North Hertfordshire District Council, December 2014) identifies a total of eight sites proposed for residential housing allocation in the town of Royston providing an estimated 973 additional dwellings.
- 1.2 The allocation site referred to as Land west of Ivy Farm, Baldock Road (Reference RY1), proposes dwelling number estimate of 311. This allocation is located to the north of Baldock Road and lies 15m to the north of Therfield Heath Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR).
- 1.3 In response to the emerging Local Plan, concerns were initially raised by Natural England as to the potential impacts that the development of this site for residential purposes may have on Therfield Heath SSSI (Natural England, letter dated 13 February 2013). Natural England comments were as follows: *"Site RY1 is in very close proximity to Therfield Heath SSSI hence an assessment should be carried out to ensure that the allocation can be delivered without having a significant impact on the interest features for which the site is designated. The potential effects of increased visitor pressure will be a key consideration and suitable mitigation measures may need to be identified to ensure adverse effects are minimised"*.
- 1.4 An outline planning application has subsequently been submitted to North Hertfordshire District Council for residential development of up to 300 dwellings and serviced land for a school (Planning reference: 16/00378/1) (<http://www.north-herts.gov.uk/home/planning>).
- 1.5 Natural England has provided North Hertfordshire District Council with two consultation responses to the planning application, dated 24 March 2016 and 19 May 2016 respectively. Natural England (letter dated, 19 May 2016) state that *"they remain concerned that the likely impacts to Therfield Heath SSSI have yet to be adequately assessed and mitigated"*. They state that *"a detailed assessment of the effects of increased recreational pressure and identification of suitable mitigation is required"* in relation to the submitted application.
- 1.6 Further written comments were subsequently provided by Natural England on the 7 July 2016 as part of the planning consultation process.

Aims of study

- 1.7 BSG Ecology was commissioned by North Hertfordshire District Council in June 2016 to undertake a desk based assessment of the potential effects of increased visitor pressure on the Therfield Heath SSSI in association with the allocation of RY1 Land west of Ivy Farm, Baldock Road taking into account the matters raised in the aforementioned consultation responses.
- 1.8 In August 2016, BSG Ecology was further commissioned by NHDC to incorporate relevant parts of the NE consultation response dated 7 July 2016 and to re-issue the revised report accordingly.
- 1.9 The desk based assessment has been based on currently available information at the time of writing. To date no bespoke survey or site specific information regarding visitor number and use of Therfield Heath SSSI has been made available.

2 Description of Therfield Heath SSSI

Reasons for notification

- 2.1 The SSSI citation (Magic, date accessed 15/06/16) states that the reason for notification of Therfield Heath as a SSSI is the presence of chalk grassland which is considered to now be a scarce resource in England mainly as a result of agricultural intensification. The site contains some of the richest chalk grassland in England. In addition, the site is known to support rare assemblages of invertebrates including the chalk hill blue butterfly *Lysandra coridon*.
- 2.2 The remaining unimproved pasture supports a rich assemblage of herbs including pasque flower *Pulsatilla vulgaris*, spotted cat's ear *Hypochaeris maculate*, wild candytuft *Iberis amara* and lesser meadow rue *Thalictrum minus*.
- 2.3 The SSSI also includes mixed scrub communities and two areas of mature beech *Fagus sylvatica* woodland. The ground flora of Fox Covert includes white helleborine *Cephalanthera damasonium*.

Condition of SSSI Units (Magic, date accessed 15/06/16)

- 2.4 Five of the six SSSI units were assessed in 2012 to be in an Unfavourable - Recovering condition. The condition assessment states that the chalk grassland sward is improving under the sheep grazing management. One of the woodland units is recorded as being in Favourable Condition.
- 2.5 The Natural England comments regarding the condition assessment relate to the condition as a result of the management regime applied to the various habitats.

Operations likely to damage the special interest (Magic, date assessed 15/06/16)

- 2.6 The majority of the operations listed by Natural England refer to management operations such as grazing, application of manure/fertilizer, drainage, hunting and killing of wild animals and do not relate to levels of existing visitor pressure.
- 2.7 Types of damaging operation listed that are linked to the public use of the site:
- Recreational or other activities likely to damage features of interest (e.g. grassland).
 - Dumping, spreading or discharge of any materials.
 - Burning - bonfires

3 Relevant Legislation and Planning Policy

Sites of Special Scientific Interest

- 3.1 Local Authority Sites of Special Scientific Interest (SSSI) duties apply under the provisions of the Wildlife & Countryside Act 1981 (as amended), and were subsequently updated by the Countryside and Rights of Way (CROW) Act (2000) and Natural Environment and Rural Communities (NERC) Act (2006).
- 3.2 The aforementioned Acts summarily place a general duty upon statutory undertakers in respect of SSSI identifying, formal consultation and notice periods, should an authority wish to give permission or assent for an operation that may damage a SSSI, the potential to give rise to an offence and the penalties that may be incurred should due process not be followed are also shown. The duty applies to all local authorities who are commonly referred to as 'Section 28G authorities' under The Wildlife and Countryside Act 1981 (as amended) (GOV.UK website, 15 June 2016). The Section 28 duty requires all local authorities 'to take reasonable steps, consistent with the proper exercise of the authority's functions, to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which the site is of special scientific interest. The authority's functions can be taken to include the planning policy and development control function (referred to as the 'planning control' or planning applications decision making process in North Hertfordshire District Council (NHDC, website, 15 June 2016) to regulate the use and development of land within their administrative area.
- 3.3 Section 28G authorities are required to consult Natural England to give formal written notice (a minimum notice period of 28 days applies) should they intend to authorise or give permission to the carrying out '*in the exercise of their functions*' any operation considered likely to damage any of the aforementioned features of SSSI (Section 28 I (1)) (Fry, M, 2007). "Permission", in relation to any operations, is defined as including 'authorisation, consent, and any other type of permission (and "permit" and "permitting" are to be construed accordingly)' (CROW Act, 2000). Natural England then advises the authority whether they give their assent or otherwise to the permission for the proposed operation to take place and stipulate any conditions. This notice requirement applies '*even if the operations would not take place on land included in a SSSI*' but may nevertheless give rise to damage.
- 3.4 The Section 28G authority is required to await the expiry of the 28 day consultation period before it decides whether to give permission, unless Natural England has advised the authority in writing that it need not wait. The authority is required to take account of any written advice it has received from Natural England in its decision making process. If Natural England advises against the permission or advises that certain conditions should be attached and the Section 28G authority decides not to follow that advice, then the authority must formally write to Natural England to state how, if at all, it intends to take on board the advice given by Natural England and the Section 28G authority should not grant a permission that would commence before the end of a 21 day period from the date of the written notice.
- 3.5 The Section 28G authority may be guilty of an offence if it has contravened the above provisions. If the operation requires planning permission and the permission of a Section 28G authority then the authority may still be deemed to have given rise to an offence, if it permits an operation without complying, unless both planning permission and Natural England's permission have been obtained. Reasonable excuses for giving permission for an operation that would give rise to damage to the special interest features refer to emergency operations. The NERC Act (chapter 16, Part 4, section 55) clarifies the offences and fines that may be applied should there be a conviction arising from an offence (GOV.UK website, 15 June 2016).

Natural England's SSSI Impact Risk Zones for SSSIs

- 3.6 Local Planning Authorities have a duty to consult with Natural England before granting planning permission on any development that is in or likely to affect a SSSI. Natural England has developed

Impact Risk Zones (IRZ) to enable an initial assessment to be undertaken of the potential risks to a SSSI posed by development proposals and to inform the need to consult with Natural England. The zones around a SSSI reflect the sensitivities of the features for which the SSSI is notified and indicates the type of development which could potentially have adverse impacts. For each zone around a SSSI there are lists of development categories and a corresponding development description.

- 3.7 Therefore the principle of the Impact Risk Zone (IRZ) will also be applicable to a local planning authority when considering potential allocation sites for residential development. If the development descriptions at a chosen location match the nature and scale of a proposed development this suggests the potential for an impact and more detailed consideration is required.

National Planning Policy Framework 2012

- 3.8 Paragraph 118 of the NPPF states that when determining planning applications, Local Planning Authorities should apply the following relevant principle:
- 3.9 *“Proposed development on land within or outside a SSSI likely to have an adverse effect on a SSSI (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site/s notified special interest features is likely, an exception should only be made where the benefits of the development at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs”.*

North Hertfordshire Draft Local Plan 2011-2031

- 3.10 The following two draft Local Plan policies set out the District Council’s position in relation to new development and the natural environment and SSSIs.

Policy NE1: Landscape and Environmental Protection

- 3.11 *“The quality and character of the natural environment will be protected and enhanced. Development proposals should complement the character of the surrounding landscape and respect locally sensitive features as identified in the North Herts Landscape Study and the Chilterns AONB Management Plan. Proposals should provide high standards of built, landscape and environmental design in support of the development and landscape management guidelines provided for each landscape character area.*
- 3.12 *Development proposals that would be detrimental to the natural environment will be refused where suitable mitigation measures cannot satisfactorily address the adverse impact.”*

Policy NE3: Biodiversity

- 3.13 *“The Council will support new developments that make a positive contribution to the biodiversity of the district and opportunities to restore degraded or isolated habitats will be sought wherever possible.*
- 3.14 *Development proposals which cause unacceptable harm to Sites of Special Scientific Interest, Regionally Important Geological Sites, and Local Nature Reserves or managed Local Wildlife Sites will be refused unless it can be demonstrated that adverse effects could be satisfactorily minimised through mitigation measures.*
- 3.15 *Development proposals which affect other sites or features of local biodiversity will not be permitted where there is an adverse impact on the ecological, geological or biodiversity interests of the site unless it can be demonstrated that adverse effects could be satisfactorily minimised through mitigation measures.*

- 3.16 *Development proposals should also demonstrate that if there are existing wildlife habitats such as trees, hedgerows and woodlands they will be retained, safeguarded and managed during and after development.”*
- 3.17 *In the supporting text accompanying NE3 policy the draft Local Plan states that the “policy will protect those sites which contribute to the biodiversity of the district from inappropriate development whilst acknowledging that in some cases the appropriate mitigation measures would enable development to take place. Where needed, mitigation measures will be used to help offset the damage to the natural environment by providing suitable levels of on or off site compensation (whichever is the most appropriate).*
- 3.18 *The policy should also ensure that features of biodiversity value are not lost as a result of a development proposal and that where possible opportunities to incorporate biodiversity in and around development will be sought.”*

4 Potential Impacts and Recommendations for Mitigation

- 4.1 The proposed Baldock Road allocation site (RY1) lies within the Impact Risk Zone for the Therfield Heath SSSI and residential development is identified as one of the development categories which could potentially have adverse impacts on the SSSI.

Potential impacts

- 4.2 The Natural England consultation response to the outline application for RY1 sets out the current threats posed by recreational pressure to the notified features of the SSSI (letter dated 24 March 2016). These are:

- Trampling of vegetation by visitors.
- Soil compaction, especially Fox Covert. (NE, letter dated 7 July 2016)
- Dog fouling- nutrient enrichment in turn leading to an increase in competitive grass species.
- Disturbance to grazing sheep through an increased use of the SSSI for dogs walking- this could pose risk to long term management of the chalk grassland.
- Anti-social behaviour – fires, theft and damage to grazing equipment.

- 4.3 In respect of the allocation and outline application, Natural England considers that additional visitor pressure is likely to contribute towards adverse impacts on the SSSI causing damage to the notified interest features, in particular the vegetation. Adverse impacts to the species-rich grasslands are considered to be the most likely impact through additional visitor pressure (pers. comm. Kate Ginns, 15/06/16).

Public Access to the SSSI

- 4.4 Therfield Heath is a registered common and has open access rights under the Countryside and Rights of Way Act 2000. As such visitors are able to walk anywhere across the SSSI and there are many desire lines which are typically unsurfaced footpaths outside of the golf course. These paths are subject to erosion and widening, particularly on the steeper slopes and in the winter months (NE, letter dated 7 July 2016).
- 4.5 The golf course has a number of surfaced paths related to the use of the golf course and Fox Covert woodland has a network of surfaced footpaths and gated access points guiding visitors through the golf course and woodlands within the SSSI.
- 4.6 Fox Covert is managed by the Hertfordshire and Middlesex Wildlife Trust who promote walking at Fox Covert and Therfield Heath, providing an information sheet with recommended walking trails and other footpaths across the SSSI¹. In addition walking on the SSSI is promoted by walking Britain², Walk4life³ and Hertfordshire Life⁴.

¹ <http://www.hertswildlifetrust.org.uk/sites/default/files/files/Fox%20Covert%20Healthy%20Walk.pdf>

² www.walkingbritain.co.uk/walk-1599-description

³ www.walk4life.info/walk/royston/therfield-heath

⁴ http://www.hertfordshirelife.co.uk/out-out/walks/a_very_common_walk_around_therfield_heath_1_1633335

Predicting Visitor Numbers

- 4.7 Various studies have been conducted to provide an indication of potential recreational participation rates. Reference has been made to several studies conducted at a national or specific geographical location elsewhere in England to inform the principles of potential effects and mitigation, where appropriate, upon Therfield Heath SSSI in the absence of any other data. For example, the Ramblers Association (The Ramblers Association, 2010) published the results of a study that indicated that, on average, 22% of the UK population walks recreationally for at least 30 minutes every four weeks.
- 4.8 Therfield Heath SSSI is located on the western edge of Royston and at the time of the 2011 census the town had a population of 15,781 with 6,800 dwellings in the town (NHDC, Local Plan 2011-2031). If the Ramblers Association participation rate is applied to these figures, it is estimated that approximately 1496 people (from Royston) will walk recreationally each month, which is equivalent to approximately 374 people per week. It is possible that these walks could occur within Therfield Heath SSSI, although it is anticipated that some of these walks will also take place at other locations. In addition, the site is also considered by Natural England to be under pressure from organised events such as sports events and runs (NE, letter dated 7 July 2016).
- 4.9 The town is set within a rural landscape and, from a review of the OS Map of the local area (Where's the Path, viewed 16/06/16), there do not appear to be any other nearby parks/sites with open public access which local people could visit on a regular basis as an alternative to the SSSI. There is a network of public rights of way within the surrounding agricultural landscape, including the Ickneild Trail running south from Royston. New residents occupying the allocation site may choose to use these public rights of way for recreational purposes. In particular, there is a public footpath bisecting the allocation site, running north away from the SSSI and joining with Harcamlow Way, a long distance walking route.
- 4.10 Due to its high profile in North Hertfordshire, Therfield Heath SSSI is reported to draw visitors from locations beyond Royston (NE, letter dated 7 July 2016), although there is no information available on the likely numbers visiting the SSSI.
- 4.11 Residential development of the Baldock Road allocation site RY1 could result in up to 279 additional households for the local area (NHDC, September 2016). Based on an average occupancy rate of 2.4 people per household⁵, this equates to a total estimated Site occupancy of 670 people. If the Ramblers Association participation rate (The Ramblers Association, 2010) is applied to this figure, it is estimated that approximately 147 additional people (from the residential development) will walk recreationally each month, which is equivalent to an additional 37 people per week. It is possible that these walks could occur within Therfield Heath SSSI.
- 4.12 A recent visitor access study for the Upper Nene Valley Gravel Pits SPA has documented the levels of people accessing the SPA in relation to their postcodes. This found that visitor rates are relatively high for areas very close to the site but drop off with distance from the SPA. Applying the approach, the proposed allocation site RY1 is approximately 15m from the nearest part of the SSSI; and future residents of the proposed development are therefore considered likely to visit the SSSI.
- 4.13 The Pet Food Manufacturers Association (PFMA) publishes statistics on pet ownership in the UK⁶. For the period 2014/15, the PFMA report that 24% of households own a dog, and so if this is applied to the proposed development, of the 311 households that will occupy the development Site, up to 67 may own a dog. These dogs are considered likely to be walked on the SSSI as well as additional locations. The impact of dogs is identified by NE to be one of the main pressures on the SSSI letter dated 7 July 2016).
- 4.14 There is currently no publically available information regarding visitor numbers to the SSSI, and the occurrence of disturbance activities and their effects on the qualifying interests. This lack of data

⁶ <http://www.pfma.org.uk/pet-population-2015>

limits the ability to assess definitively whether an increase in visitor numbers to the SSSI could result in significant effects to the qualifying features.

- 4.15 Without mitigation, it is therefore not possible to rule out adverse effects on the notified interest features as a result of the allocation of RY1 Land west of Ivy Farm.

In-combination impacts

- 4.16 Natural England has developed SSSI Impact Risk Zones (IRZs) for all SSSI to define zones around each SSSI which reflect the sensitivities of the feature for which it is notified and indicate the type of development proposal which could potentially have adverse impacts. For Therfield Heath SSSI there are four risk impact zones identified, the furthest of which extends to 2km. The SSSI IRZs have been drawn to reflect the specific features for which the site is notified and it therefore seems reasonable to use this 2km zone to consider 'In-combination impacts'. As a precautionary approach, this has been extended to 5km from the SSSI. Table 1 sets out the total numbers of known allocated housing sites, completions and permissions for each community within 5km of the SSSI (North Hertfordshire District Council, Local Plan 2011 – 2031 Proposed Submission Draft).

Table 1: Allocated housing Sites within 5km of Therfield Heath SSSI

Community name	Number of allocations	Total allocated sites, completions and permissions
Ashwell	1	95
Royston	8	1712 (1433 excluding RY1)
Therfield	1	22
Reed	1	34
Total	11	1584

- 4.17 There are eleven additional allocations within 5km of the Therfield Heath SSSI amounting to 1584 new homes for the period 2011 - 2031.
- 4.18 As it is not possible to rule out adverse impacts on the notified interest features of the SSSI as a result of the allocation of RY1 Land west of Ivy Farm alone, it therefore follows that an additional 1584 homes within 5km of the SSSI could also contribute to an increase in visitor/recreational pressure on the SSSI.

Suggested Avoidance, Mitigation or Compensation Measures

- 4.19 The following ecological measures to avoid, mitigate or compensate for the potential for harm to the SSSI in respect of the allocation site are identified further to consideration and review of Natural England's consultation responses.
- 4.20 Further consultation by North Hertfordshire District Council with Natural England is a priority regarding the mitigation principles together with specific consultation on any planning application submission from the pre-application stage onwards so as to ensure that the local authority meets its duty as set out in Section 3 and to ensure that suitable provisions to safeguard the SSSI interest features are agreed in advance. This may include planning conditions or s106 obligations as appropriate and proportionate to the size, nature and location of a proposed development.
- 4.21 Natural England considers that up to date visitor information is required in order to develop the most appropriate mitigation measures for the SSSI and to identify any further issues that may arise on the SSSI interest features as a result of the other housing allocations.
- 4.22 Consultation was undertaken with Natural England in June 2016 (Phone calls to Kate Ginn, 13/06/16 and 15/06/16, email dated 14 June 2016) to discuss visitor pressure on Therfield Heath SSSI and to potential mitigation measures. Natural England suggested that the North Hertfordshire

Local Plan Preferred Options could include a package of measures to be addressed by any potential applicant to take forward the development of the Baldock Road allocation site:

- Incorporation of alternative areas of land of a suitable size for informal recreation purposes and to review the extent and location of existing green infrastructure in the Royston area with the aim of including habitat creation to generate additional biodiversity interests. For example the two fields to the north of the allocation site could, for example, be used to create a country park. The layout and design of this alternative greenspace needs to be designed to ensure the park is sufficiently attractive to people and will provide an attractive alternative recreation resource to Therfield Heath SSSI.
- Provision of accessible natural greenspace elsewhere in Royston which could then also be used by wider community of Royston, thereby reducing the overall visitor pressure on the SSSI.
- Employment of an on-site warden for Therfield Heath SSSI to reduce the misuse of the site, particularly in relation to uncontrolled dogs, livestock worrying and vandalism to the fencing/grazing equipment. This provision could potentially be achieved through a Section 106 agreement as part of a future planning consent.
- Formalise the access within the SSSI, for example defining the footpaths on the hill to prevent visitors widening the paths and therefore reducing the effect of trampling on the chalk grassland. The consultation response from NE (dated 7 July 2016) highlights concern that these measures could lead to an increase in the need for maintenance and lead to further urbanisation of the heath.
- A contribution to the preparation and implementation of a Management Plan for Therfield Heath SSSI. There are opportunities for the council to engage with Natural England to identify any contributions that could be made to improve visitor management and reduce the misuse of the SSSI.
- Make a financial contribution to the visitor management at Therfield Heath SSSI to specifically include footpath maintenance, on-going provision of interpretative material to explain to visitors why they should keep to the footpaths and keep dogs on leads or under close control around livestock.

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