

# NICHOLSONS LOCKHART GARRATT

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Our Ref: 22-0620

Lee Stannard  
Planning and Building Control  
St Albans City and District Council

14<sup>th</sup> October 2022

Dear Mr Stannard,

## **RESPONSE TO ECOLOGY COMMENTS / LAND WEST OF WATLING STREET, PARK STREET, ST ALBANS (“the Site”)**

### Potential Badger Mitigation

I write in response to the comments made by local residents (Greenbelt) following the submission of the planning application 5/2022/0267 and the subsequent comments from Martin Hicks at Hertfordshire Ecology dated 22<sup>nd</sup> July 2022.

I have now had the opportunity to survey the land to south of the Site and a file note with an accompanying plan confirming my findings is provided. Whilst the land to the south was heavily vegetated, it was felt that a robust survey of this area was undertaken and I concluded that this area of land is unlikely to be used by badgers for sett making with no evidence of any setts being found. There was evidence of foraging and territory marking by badgers in the land to the south of the Site and therefore, it is considered appropriate to adopt a precautionary approach towards this species in connection with the proposed development. The Illustrative Landscape Design and Illustrative Layout have been updated to provide a 10m buffer between the Site and the land to the south. This area will be a rough grassland area with occasional scrub planting and bordered by a species rich hedgerow. This is designed to maximise the foraging area for badgers and provide additional food resources for them.

It is also considered appropriate that a pre-commencement condition is included within any planning decision to check the Site again within 4 weeks of work commencing to establish whether the activity within the Site has changed. If there is a change in activity and additional mitigation by way of additional buffering is required along the southern boundary, it would be possible to accommodate this at the detailed design stage.

### Biodiversity Net Gain

In response to Hertfordshire Ecology's comments dated 6<sup>th</sup> July 2022, the Illustrative Landscape Design and Biodiversity Net Gain (BNG) calculation have been updated to ensure that they are aligned.

The comments in relation to the viability of the grassland habitats have been noted and amended with a view to providing strips of amenity grassland verge alongside most access roads and footpaths which then leads to rougher grassland habitat. Where it is appropriate i.e., the play area and the open space in the south-west of the Site, amenity grassland has been used.

It is considered appropriate that the western and southern boundaries of the Site are as natural as possible to provide a buffer against the habitat to the west. Furthermore, the boundary to the east will front on to Watling Street and therefore, is considered less likely to be used for recreational purposes.

The assumption in respect of the grassland condition has changed slightly in terms of weighting to account for this additional amenity grassland provision. The weighting of the assumption is that 75% of the rough grassland creation will be in good condition with 25% in moderate condition. This is to reflect the fact that there is less likely to be trampling of rough grassland given the presence of a mown strip of amenity grassland alongside footpaths/access roads.

On this revised scheme and assumptions, the BNG calculation now shows a gain of **12.90%**. This is based on the Illustrative Landscape Design at this stage, and as such a conservative approach has been taken to the gains that are achievable within the Site. It is expected that further gains can be achieved as part of the detailed design stage in the future.

Yours sincerely



Jo Alderton BSc (Hons), PG Dip Law, ACIEEM  
Ecological Consultant

**Enc:**

22-1047 Badger Survey File Note v1 JA 101022  
22-1057 Badger Survey Plan v2 SM 101022  
21-1589 Biodiversity Metric v4 JA 121022  
21-1600 Biodiversity Net Gain Plan v5 SF 181022