

Our ref: 8593\_R\_LNR\_20160318\_APPR

Your ref: Blackhorse Farm, Baldock. Impact on Ivel Springs

18 March 2016

David Hill  
Strategic Planning  
North Hertfordshire District Council  
Council Offices  
Gernon Road  
Letchworth Garden City  
Hertfordshire  
SG6 3JF

Dear David

**Re: Ecological Advice on North Hertfordshire District Council's position on Ivel Springs LNR and CWS in Relation to the development at Blackhorse Farm, Baldock.**

**Background**

The North Hertfordshire Preferred Options Local Plan consultation process has identified Blackhorse Farm as having the potential to accommodate approximately 2,800 new homes, a secondary school and 2 primary schools. The outline of the proposal is shown as Figure Number A086401\_005. The developed area will also incorporate approximately 28 ha of Public Open Space and 4 ha of playing fields.

The site is currently 131 ha of arable farmland interspersed with hedgerows, ditches and a single minor road (Bygrave/ Ashwell Road).

In response to the emerging Local Plan, there have been concerns raised about potential impacts on the Ivel Springs Local Nature Reserve (LNR) and County Wildlife Site (CWS) by local stakeholders.

The enclosed letter outlines the expectations of North Hertfordshire Council as to how impacts on Ivel Springs can be identified and addressed through survey, stakeholder consultation and design phase mitigation, alongside the policy context for this.

**Ivel Springs LNR and CWS**

Ivel Springs LNR and CWS lies directly to the west of the proposed development site (see Figure 1). It is approximately 15 ha in size. Some biodiversity information relating to the site is contained within a Greenspace Action Plan, produced by North Hertfordshire District Council in January 2015<sup>1</sup>.

Habitats at Ivel Springs have predominantly developed since the 1950s. They include neutral grassland (managed as a hay meadow), secondary woodland, ruderal vegetation and scrub along the upper reaches of the River Ivel, a tributary of the River Great Ouse. The watercourses that issue to form the Ivel originate from a series of chalk springs within the site, and are largely seasonal.

Species information provided in the Greenspace Action Plan is limited, although amphibians and reptiles are known to occur, and a number of common bird and mammal species have been noted.

---

<sup>1</sup> North Hertfordshire District Council, Greenspace Action Plan, 2015. <http://www.north-herts.gov.uk/ivel-springs> [Accessed online 22 February 2016].

There are also issues with non-native invasive plants such as Himalayan balsam *Impatiens glandulifera* and giant knotweed *Fallopia sachalinensis*<sup>1</sup>.

The Greenspace Action Plan for the site identifies a mixture of ongoing and potential measures to maintain and enhance the biodiversity value of the site. Currently some maintenance work is completed by contractors working on behalf of North Hertfordshire, and some by the Friends of Baldock Green Spaces Group (the Friends Group).

The development has the potential to result in increased uncontrolled recreational use of Ivel Springs LNR and CWS. This could potentially lead to impacts such as disturbance of wildlife, enrichment of the soil (as a result of dog fouling), and (various) anti-social behaviour. However, there is also an opportunity to deliver conservation gain, management and to further understand the biodiversity value of the site as a result of the proposed development.

### Policy Context

The National Planning Policy Framework (NPPF) (2012) requires local planning authorities to draw up policies that minimise impacts on biodiversity. Paragraph 117 of NPPF indicates that the means to achieve this include identifying and mapping the components of local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, promoting the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets.

The North Hertfordshire Local Plan 2011-2031 Preferred Options Consultation Paper (December 2014) contains a number of draft policies relevant to Ivel Springs CWS and LNR, and which will need to be given appropriate consideration. These are likely to be broadly reflective of the policies in the adopted Plan:

- Policy NE1: *“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. Development proposals that would be detrimental to the natural environment will be refused where suitable mitigation measures cannot satisfactorily address the adverse impact.”* (abridged)
- Policy NE2: *“The Council will protect and enhance green infrastructure assets and new opportunities for creating green infrastructure will be sought. Where appropriate new development will be expected to contribute towards the provision of additional green infrastructure and the protection and enhancement of existing green infrastructure. Developers should use the guiding principles set out in the Green Infrastructure Plan to influence all development proposals from an early stage in the design process. Any new green infrastructure proposed must be accompanied by a plan for the long term sustainable maintenance and management of these assets, as well as phasing plans to demonstrate how they are to be delivered.”*
- Policy NE3: *“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. Development proposals which cause unacceptable harm to Sites of Special Scientific Interest, Regionally Important Geological Sites, 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. 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. 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.”*

North Hertfordshire District Council is also committed to the sustainable management of its greenspace assets and their improvement in line with user needs through its Greenspace Action Plan and Greenspace Management Strategy respectively.

### **Approach to Ecological Impact Assessment**

The Ecological Impact Assessment (EclA) for the site will need to be informed by robust baseline data including thorough desk study and ecological survey. It is anticipated that the assessment method will be based on industry standard guidelines (CIEEM, 2016).

#### *Desk Study*

The desk study should make use of publically available internet resources to provide contextual information<sup>2</sup>. In addition local records held by Herts Environmental Record Centre should be reviewed for the site and an appropriate perimeter area.

The hydrological connectivity of Ivel Springs to the development site should also be considered within this desk study, in particular if any drainage channels currently flow from the site into the CWS and LNR. This will allow early consideration of the location of watercourses in the context of Masterplanning.

#### *Field Survey*

An initial survey of the Ivel Springs site should ideally be conducted between April and July in accordance with standard Joint Nature Conservancy Council (JNCC) guidelines for Phase 1 habitat survey<sup>3</sup>. During the survey all habitats should be mapped, and notes made on the dominant flora present. The Phase 1 survey should be extended to determine the presence of protected or otherwise notable species, or potential for them to occur within the CWS and LNR, including breeding birds, mammals, amphibians and reptiles. If there is potential for these features of the site to be affected by the proposed development, more detailed botanical and protected species survey work should be completed in order to fully understand the baseline situation.

The ecological information gained from the survey work will need to be considered in combination with baseline hydrological survey data and conclusions as to how the development might impact on flows and water quality.

#### *Stakeholder Engagement*

It will be important to engage with the Friends of Baldock Green Spaces Group to understand and to attempt to address their concerns. Consultation and any subsequent meetings should be informed by the desk study, Phase 1 survey and a review of the Greenspace Action Plan produced by North Hertfordshire District Council (2015). Preliminary consultation has been undertaken with the Tony Bradford of the Hertfordshire Countryside Management Service his response is included as appendix 1.

### **Information Required to Support the Planning Application**

It is anticipated that the following ecological information will be required to support the planning application:

---

<sup>2</sup> This should include websites such as the Multi-Agency Geographic Information for the Countryside (MAGIC) database and Bing and Google maps to review OS maps and aerial photographs of the local area.

<sup>3</sup> JNCC (2010). Handbook for Phase 1 habitat survey. A technique for environmental audit. Joint Nature Conservancy Council. Peterborough

- A detailed assessment of the potential for impacts to occur on Ivel Springs LNR and CWS (within the EclA chapter). This will include any mitigation required to address potential impacts on water quality and flows and recreational pressure on the biodiversity interest and the ecosystem services the site offers to local people.
- Measures to maintain and enhance the interest of Ivel Springs (in a commensurate way) through both complementary development design (Masterplanning) and management works as part of an outline Habitat Management Plan submitted with the planning application. This document should be produced in accordance with the British Standard for Biodiversity (BS42020). This should include a basic financial commitment, a timeframe over which the enhancement work will be delivered, and a clear indication of how the plan will be legally secured. Should the development be consented, there will be a planning condition or obligation based on this commitment.

On the assumption that planning consent is achieved, in order to discharge the conditions a detailed Habitat Management Plan will need to be produced, and a means to deliver capital works agreed. This Habitat Management Plan will include land management objectives (which will be subject to periodic review). Progress against the plan will be documented in an annual report issued to the council and to the Friends group.

Yours Sincerely



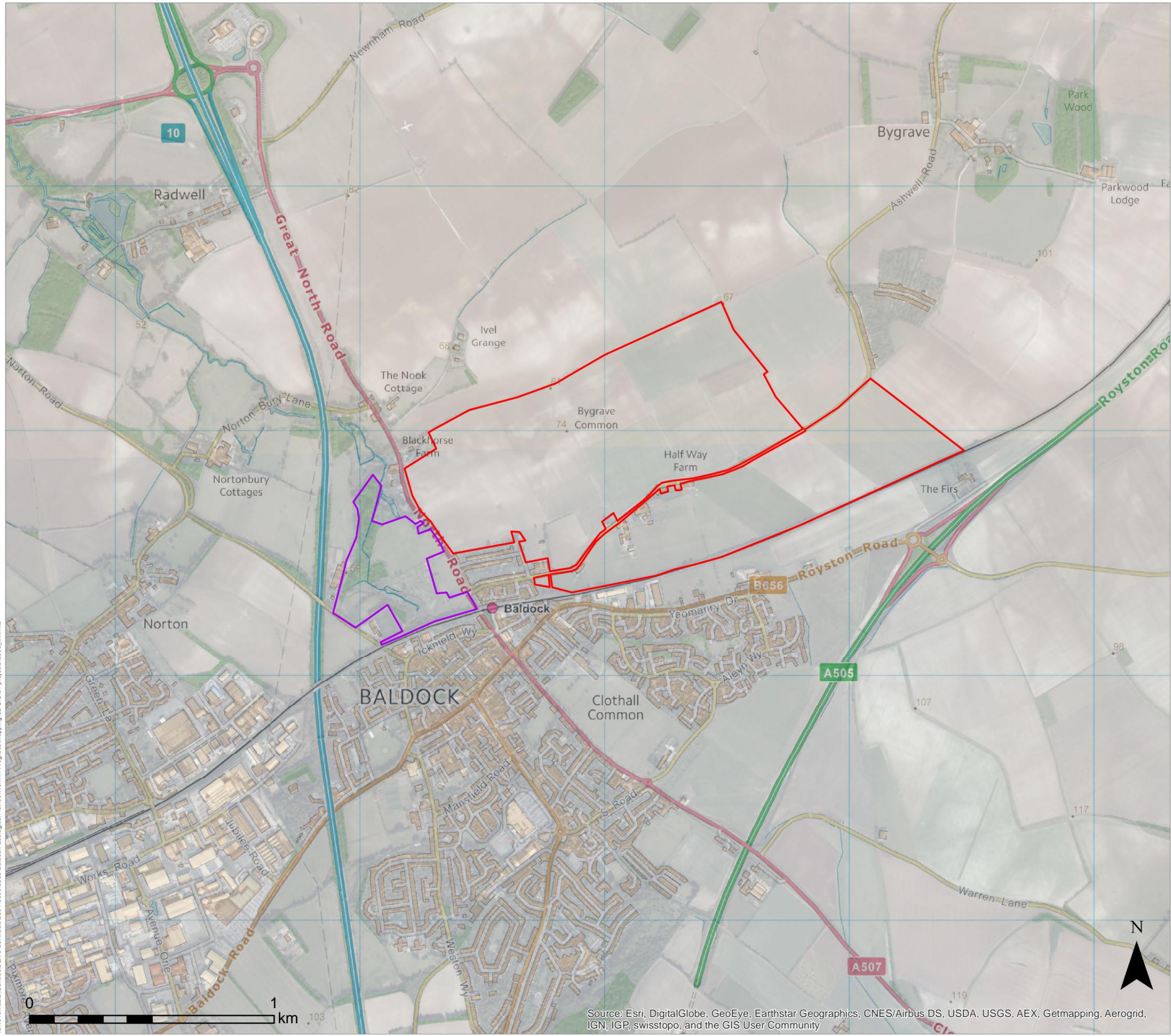
Peter Newbold

Senior Ecologist

For and on behalf of BSG Ecology

## Figures

(overleaf)



**LEGEND**

- Site boundary
- Local Nature Reserve (LNR) and County Wildlife Site (CWS)



OFFICE: Oxford  
 T: 01865 883833  
 JOB REF: 8593.00

PROJECT TITLE  
**BLACKHORSE FARM, BALDOCK:  
 ECOLOGICAL ADVICE**

DRAWING TITLE  
**Figure 1: Ivel Springs LNR and CWS**

DATE: 10.02.2016      CHECKED: PN      SCALE: 1:15,000  
 DRAWN: COH      APPROVED: OG      STATUS: FINAL

Copyright © BSG Ecology  
 No dimensions are to be scaled from this drawing.  
 All dimensions are to be checked on site.  
 Area measurements for indicative purposes only.  
 This drawing may contain: Ordnance Survey material by permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office © Crown Copyright 2016. All rights reserved. Reference number: 10048980  
 OS Open data © Crown copyright and database right 2016 | Aerial Photography © Esri  
 Sources: BSG Ecology survey data; LNR/CWS boundary provided by North Hertfordshire District Council

\\sv01\oxford\data\contracts\live\contracts\8501-8600\8593 Baldock Ecological Advice\Work in Progress\Mapping\02 GIS\01 projects\8593\_inr.mxd

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

## Appendix 1: Initial response from Tony Bradford, Hertfordshire Countryside Management Service.

From: Tony Bradford  
Sent: 25 February 2016 09:25  
To: Andrew Mills  
Cc: David Hill  
Subject: FW: North of Baldock Study

Hi Andrew/David

### To update on the attached document regarding Ivel Springs.

The hay meadow will, from 2016, be grazed by 4 Long Horn Cattle as a means to improve the biodiversity value of this habitat.

The River Ivel is fed by springs located within the LNR boundary – in addition, further upstream, water from a land drainage flood mitigation structure discharges into the head of the river having been fed itself by water drained from the nearby town.

### Comments on the impact for Ivel Springs and Opportunities to Mitigate Impact.

The LNR has as an adjunct an area of allotments. There exists a tension between the allotments and the LNR in terms of land use. There are also positives in terms of having the two provisions adjacent to each other.

It is likely that were the development to be granted permission demand for allotments would increase. There is perceived to be little room for expanding the number of available allotment plots adjacent to the Ivel Springs LNR without extending in to the adjoining land designated as LNR. Equally, further required allotments will likely lead to a requirement of more on-site parking for which there is no land. It could be feasible to consider the location of allotments within the development greenspace. However, there is a good argument for expanding the existing provision and maximising the existing infrastructure. There is a plot of land that lies between the allotments and the North Road which might be transferred to NHDC with sufficient capital as to enable the provision of required allotment plots and associated parking without this impacting on Ivel Springs LNR.

The surface water drainage facility and LNR wetland immediately down stream of this would benefit from significant improvement. The facility requires improvement to fulfil its role of slowing down and cleaning the water that flows into it before it is released into the Ivel. Just downstream, and within the LNR, is a wetland area. This has been the focus of some improvement works, creating open water habitat. However, this has been limited by available budget. Ideally the accumulated sediment in this part of the site should be excavated and taken away from site with the intention of creating a substantial reed bed habitat. Such a habitat would be typical of this location, would fulfil Biodiversity Action Plan priorities and would also do much to filter the water coming from the built environment before it reaches the main, chalk river.

Land between the LNR and the football club grounds are somewhat superfluous and could be included into the Local Nature Reserve or its management enhanced to accord with the reserve. This might include survey, fencing, restorative grazing, ground levelling (if nothing would be lost as a result).

Looking beyond the LNR, it is clear that the development will place additional pressure upon the LNR from visitors. Considering how people travel to the Reserve will be key. Ideally some form of sustainable transport route through the development should enable residents to visit without using their cars and requiring somewhere to park. Cycle parking at the Reserve should be provided. There is also concern that with additional pressure on the station parking facility the LNR/allotment parking may become under pressure from overspill use. This requires consideration.

By the time this development is underway the interpretation (panels and leaflet) for the Local Nature Reserve will be dated. Provision to update this for current residents and also to act as an introduction to the site for the residents of the proposed development would be appropriate.

Tony Bradford (MSc)  
Head of Countryside Management Service  
Countryside Management Service Office  
Hertford