



# THE HODDESDON SOCIETY

Charity No 234800

## RESPONSE FROM THE HODDESDON SOCIETY RE FORMER TURNFORD SURFACING SITE - PLANNING REF 07/20/0467/F

The site for the proposed development is an extremely sensitive one, being next to the River Lea, which is one of the Borough's most important natural assets, and in sight of the Rye House Gatehouse.

The proposal is now for a significantly increased number of dwellings from Policy HOD4 in the Local Plan 2018-2033 (104 from 40), and the station car parking facilities identified in that Policy have been reduced (though a much needed cycle park provision is provided).

However, despite the increase in size, we believe that a high quality development which is sensitive to and enhances its surroundings could transform what has been a neglected part of Hoddesdon. Due to the nature of the location, in particular its close proximity to sensitive ecological receptors and a Grade 1 listed historical site, sympathetic high quality design is essential.

However, strictly subject to the important ecological mitigations identified in the Ecological Report and summarised below, we would have no objection to this development. We believe that these mitigations are crucial and would ask the Planning Officer to make them conditions to the planning approval.

### 1. MITIGATING FEATURES – PERMANENT DESIGN

- 1.1 The soft landscaping plans show how the development plans to establish hedgerows, meadow grassland and further native trees to provide a wildlife corridor and additional habitats, which are welcomed. There are however a few important elements which are required by provisions in the Local Plan, highlighted in the Ecological Report and are not evident in the application.

#### Lighting

- 1.2 The Local Plan 2018-2033 notes at paragraph 28.15 that *“Inappropriate lighting can have serious adverse effects on the behaviour of animals, particularly nocturnal animals, and birds. Bat populations are particularly sensitive to development that severs or disturbs their movement corridors. Lighting within, and around a development, must respect the ecological functionality of animal and bird movement corridors. In these circumstances surveys will be required to determine where these movement corridors are, and measures put forward that demonstrate how these will be protected.”*
- 1.3 Policy EQ3 (Lighting) states:  
  
*“I. Proposals for development including new lighting, or new lighting proposals, will be considered against the following criteria: (a) the need for the lighting; (b) whether there would be an unacceptable adverse impact upon the amenity of residents, highway users, and biodiversity; (c) whether the necessary steps have been undertaken to reduce lighting overspill and pollution.*

*II. Applications for lighting should detail light angles, the design and spread of lights, the strength of luminance, height of light columns and proposed hours of use.”*

- 1.4 The Ecological Report confirms that sensitive lighting is essential to ensure that there is no negative effect on bats and water voles. This is particularly the case because the development is so close to the towpath and the riverbank. The Ecological Report notes that:
- 1.4.1 External lighting at the development needs to be:
- (a) Only where necessary;
  - (b) On sensors so that there are no prolonged lit periods (periods of dark in the evening are very important);
  - (c) On a warm white spectrum, featuring peak wavelengths of higher than 550nm. Lights with UV elements should be avoided.
- 1.4.2 As to internal lighting, appropriate steps should be taken to prevent light spillage as much as possible towards the river.
- 1.5 We do not understand from the design documents provided how the developer intends to implement these recommendations.
- 1.6 Given the recommendations in the Ecological Report and the provisions of the draft Local Plan referred to above, we would have expected specific input from a lighting professional so that Planning would be able to properly understand how the mitigating recommendations were to be implemented. The Bat Conservation Trust’s Guidance Note 8/18 on Bats and Artificial Lighting notes that specific advice from a lighting professional, including a horizontal illuminance contour plan, should be provided and that *“such calculations and documentation would need to be prepared in advance of submission for planning permission to enable the LPA ecologist to fully assess impacts and compliance.”*
- 1.7 To give effect to Policy EQ3, we would ask the Planning Officer to require a specific lighting proposal for the development, including a horizontal illuminance contour plan, and giving proper consideration to the design of the building to prevent light spillage towards the river (for example, low transmission glazing treatment to glass, “smart glass”, the use of blinds, recessed internal lights, hoods or louvres).
- 1.8 Because of the importance of sensitive lighting, we would ask that the Council requires a post construction lighting survey to ensure that the conditions of planning relating to lighting are carried out.

#### **Nest boxes/bat bricks**

- 1.9 The Local Plan Policy NEB4 provides for integrated features for bat and bird boxes to be incorporated into all suitable buildings. This is clearly such a suitable building. The Ecological Report recommends that bird boxes are installed on retained trees and the buildings (starling, swift, house sparrow) and artificial bat bricks or bat tubes incorporated into the building, plus bat boxes on suitable retained trees.
- 1.10 We support the recommendation made by the Herts and Middlesex Wildlife Trust that a condition be attached to the decision requiring 10 integrated bat boxes under the ridge line of buildings and on the eastern or southern aspect.
- 1.11 We would also ask that a similar condition is introduced to include bird boxes in appropriate locations in order to give effect to Policy NEB4.

## **Trees**

- 1.12 The Arboricultural Impact Assessment identifies trees to be retained and appropriate construction methodologies. We would ask the Council to include the retention of these trees as a condition of the planning permission.

## **Hedgehogs**

- 1.13 The Ecological Report identifies that in order to mitigate the effect on hedgehogs, new boundaries are to be permeable to hedgehogs, via the creation of ground-level boundary holes.

## **Views of car park from river**

- 1.14 Policy HOD4 requires the development to enhance the setting. The “green screening” envisaged needs to be sufficient to obscure all under building car parking areas from the river walkway.

## **2. MITIGATING FEATURES / PROCESSES DURING CONSTRUCTION PHASE**

- 2.1 We hope that the Council will include provisions relating to the following as requirements of the planning permission (all of which are referred to in the Ecological Report) and will ensure that these are monitored as appropriate:

- 2.1.1 There are a number of recommendations relating to the site clearing stage:
- (a) Habitat clearance works to be outside main nesting season or inspected by an ecologist prior to clearance (with exclusion zones to be added if nesting birds found).
  - (b) Sensitive clearance of vegetation and of trees with potential for bat roosting in accordance with the recommendations in the Ecological Plan.
  - (c) Care taken clearing sheltering habitat (specifically watching out for hedgehogs and reptiles).
  - (d) The excavation of raised earth bund to be outside reptile hibernation season.
- 2.1.2 A pollution prevention protocol during construction.
- 2.1.3 Noise limiting processes during construction (including the setting of working hours and minimising the use of noisy plant where possible)
- 2.1.4 Visual barriers/hoarding;
- 2.1.5 Restrictions on lighting at night (security lights etc)

**The Hoddesdon Society**  
**16 July 2020**