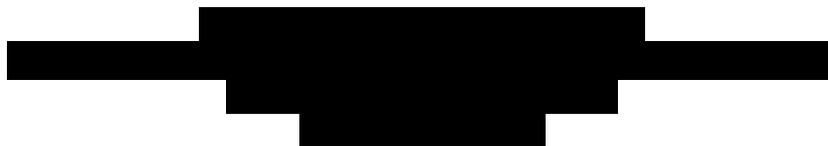


# HERTFORDSHIRE ECOLOGY

Providing ecological advice to Hertfordshire's Local Authorities and communities



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Ask for: Martin Hicks  
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Date: 19/03/2015

Dear Colin,

## **Planning the future of Welwyn Hatfield – Local Plan Consultation 2015** **Local Plan Consultation 23 January to 19 March 2015**

Thank you for consulting Hertfordshire Ecology on the above local plan. We would like to make the following comments in respect of ecological matters on main Policy aspects of the Plan, on main proposals for sites outlined within the Plan and Development Management Policies and Appendices, as referenced sequentially within the document:

### **2. The Emerging Core Strategy**

**2.2** Herts Ecology recognise and support the Emerging Core Strategy's aim '*to protect areas of highest environmental value*'.

**2.5** Herts Ecology note the Sustainability Appraisal report conclusions. These state that whilst the '*revised strategic policy intentions and site allocation options are likely to deliver positive benefits across a wide range of sustainability objectives.....with the need to deliver a higher objectively assessed housing target, there is a greater potential for negative effects on some objectives particularly biodiversity, landscape character....*'. This clearly recognises that certain ecological and wider environmental resources will be detrimentally affected by development. Consequently, Herts Ecology will expect to see a rigorous approach to site allocations and their associated impacts in accordance with the principles outlined within NPPF, along with efforts to ensure that any necessary developments causing negative impacts directly or indirectly are compensated or mitigated, and enhancements are sought.

2.6 Herts Ecology note that *'the Sustainability Appraisal does acknowledge that development can have some associated negative effects'*. Herts Ecology consider that this places a responsibility on Welwyn Hatfield Borough Council to limit these as far as is reasonable and seek to secure sustainable ecological enhancements where appropriate.

### **3 CS2 Meeting the Needs for Growth**

3.21 Herts Ecology note potential employment land sites within the Green Belt will need to justify that *'exceptional circumstances exist for altering the Green Belt boundary for a strategic allocation'*. Open land development will impact upon existing ecological functions to a greater or lesser extent depending on the situation. This should be a consideration in allocating or planning for any such site. Herts Ecology also acknowledge that in considering any such development area, it should be *'adjacent to an existing settlement boundary and would not result in coalescence between settlements'*. Open land between settlements always has the potential to act as wildlife (and landscape or amenity) corridors, depending on its character and management. Avoiding coalescence helps to reduce further ecological fragmentation.

### **4 CS3 Settlement Strategy**

Herts Ecology support the statement and **Policy Intention CS3** that there will be no Green Belt boundary changes proposed around villages. This allows for a better transition ecologically between open countryside and the edges of smaller settlements, further enabling wildlife to use Green Infrastructure assets within the villages themselves.

### **5. CS4 Green Belt Boundaries and Safeguarded Land**

5.1 NPPF encourages planning positively for the beneficial use of the Green Belt to retain and enhance landscapes, visual amenity and biodiversity. Herts Ecology acknowledge that a high proportion of the Borough (79%) currently lies within the Green Belt, which should help to sustain much of the open character of the Borough and its associated ecology and ecosystem services. This is, however, very dependent upon management and is a consideration when comparing the relative quality and contribution that sites make.

5.2 Herts Ecology recognise the Plan aim of *'channelling development towards towns and villages'*. Whilst this seeks to retain the open land resource, where appropriate valuable urban ecological resources should also be recognised and conserved where possible so as not to degrade the biodiversity of the built environment.

5.4 In this respect, Herts Ecology note the council's affirmation that one of the five purposes of the Green Belt is to *'assist in safeguarding the countryside from encroachment'*. Where such countryside is ecologically valuable, this will also safeguard any associated biodiversity interest ecology although the management required to sustain this also needs to take place.

5.13 Herts Ecology welcome the proposals that *'larger strategic housing sites (500+ dwellings) released from the Green Belt will need to be subject of a masterplan [which] may involve the provision of significant areas of open space'*. Indeed, open space should reflect existing resources and opportunities which may present themselves for ecological maintenance and enhancements.

## **Policy Intention CS4 – Green Belt and safeguarded Land**

Given that existing Green Belt purposes are defined, ecological interests are considered to be best served by large areas of open space remaining in the Green Belt, where they can also serve to set clear development boundaries. Management of such areas remains an essential aspect although is largely outside the scope of the planning process, whether Green Belt or Urban Open Land unless it is linked to major development.

## **7 CS19 Strategic Green Infrastructure**

**7.1** Herts Ecology acknowledge that *‘whilst the development of large strategic sites around Welwyn Garden City and Hatfield could result in the loss of large areas of land in the Green Belt, it would also provide an opportunity to create a network of connected green open spaces providing access to natural green space, enhance biodiversity and help to mitigate the impact of development’.*

In this respect the nature and management of the natural green space is critical if it is to provide genuine compensation for the loss of open land and biodiversity enhancements. Simply providing the amenity aspects of greenspace as outlined in 7.2 is insufficient, as these presume high quality greenspace is present to begin with and can be maintained – which may be beyond the role of planning in some cases.

**7.3** Linked to this, Herts Ecology is most concerned about the *‘loss of a significant part of Ellenbrook Fields Country Park.’* Whilst this *‘could only be acceptable if the remaining part of the park could be secured for the longer term as a high quality informal recreation and nature conservation resource with links to the wider network of green spaces’* and the *‘strategic green infrastructure belt’*, Herts Ecology believe there remain some serious outstanding issues with this approach, including the following:

- Development will be highly damaging to the developing ecological interest of this part of the Park;
- Increased development will generate increased pressure on the remaining resources of the Park;
- The development will degrade the ecological setting of Home Covert by impacting upon the semi-natural grassland next to it;
- Development will introduce additional disturbance to the Home Covert woodland being adjacent to it;
- The management of the remaining parkland is outside the control of planning unless subject to S106 agreement;
- The remaining area is also likely to be dug for gravel (7.4), changing the nature of the area permanently in the longer term to a largely wetland environment unless extraction pits are filled in. Although this is unlikely to occur over all of the area at the same time it is hardly conducive to a functional Country Park environment.
- The strategic Green Infrastructure belt in Fig 2 is poorly expressed, with no rationale or wider Borough or County context. It doesn’t reflect the key GI link which is the River Lea and is severely compromised by the A1 although it

does serve to highlight some key sites. The strategic function of some of these, such as Ellenbrook Fields - are, however, not clear.

In this context, the function of what is currently Ellenbrook Country Park will largely cease to exist. This may not represent a significant loss of an intrinsically high quality or ancient habitat as following cessation of its relatively recent use as part of Hatfield airfield, subsequent surveys did not identify the survival of high quality unimproved grasslands. However more recent management of the large areas of open grassland has enabled the development of a general grassland habitat of some considerable local bird interest – although this would be modified again due to any future gravel workings and recreation pressure. The net impact therefore needs to be considered accordingly, and habitat compensation provided elsewhere which would offset the loss of at least some of this resource.

Use of Hertfordshire's Ecological Networks Mapping should be considered where appropriate to inform the location and nature of Green Infrastructure, where opportunities arise.

### **Policy Intention CS19 - Strategic Green Infrastructure**

Herts Ecology consider that:

- GI resources should reflect the functionality of these *across the Borough* and the relationships with neighbouring Districts where open land resources are vulnerable to coalescence.
- GI should be therefore shown at the Borough scale on the key diagram.
- Local GI maps may be needed to detail provision of the principle GI resources locally

Herts Ecology welcome the approach to secure GI delivery through S106 agreement and CIL, given the fundamental importance that land management will play on securing genuine ecological enhancements.

## **8 Spatial Policies**

### **Welwyn Garden City**

**8.2** Herts Ecology recognise that '*Considerable concern was expressed over the loss of Panshanger Airfield*'. This is known to include ecological resources although none have ever been formally recognised that reflect any significant intrinsic habitat importance. The value lies in the rather neglected and undisturbed areas of grasslands around the periphery which have increasingly become important for birds and probably other wildlife. Herts Ecology believe that any such ecology needs to be fully considered and the potential for habitat compensation pursued as necessary should opportunities arise.

### **Hatfield**

**8.4** Herts Ecology urge that some clarification is needed for the long term approach to Ellenbrook Country Park. The current vision that outlines a significantly reduced park resource that will then be dug for gravel must also present restoration

expectations and management requirements that give some credibility to the concept of a Park, otherwise it will essentially cease to serve any such function. Whilst the existing ecology could be wholly modified to a wetland complex, a future ecology associated with such areas – should these be the preferred restoration requirements – could also develop into a valuable wildlife resource, depending on recreational pressure - which is likely to be high. Herts Ecology believe that this should be a part of the proposed vision for Hatfield (8.5).

## **9 Approach to site selection**

### **Housing**

**9.5** Herts Ecology acknowledge that *‘sites which are poorly connected to an urban settlement boundary [or] result in the loss of a Wildlife Site or a historic asset [or] have a high risk of flooding have already been ruled out as unsuitable’*. Although *‘The remaining sites have been assessed in more detail’*, this may not have fully considered any new ecological information available or a general contribution to biodiversity locally. These are aspects which will need to be considered if sites are brought forward, including any implications from the Ecological Network mapping exercise.

### **Urban Open Land**

**9.13** Herts Ecology note that *‘the Local Plan will generally protect open spaces.... The adopted District Plan designated more than 200 areas of open space as Urban Open Land because they performed a key built environment function in addition to any recreational, ecological, landscape or other amenity’*.

In particular, Herts Ecology support designating criteria which include:

- *The land is important or could in future be important, in whole or part, to any wider green chain or open corridor; or*
- *The land is important or could in future be important, in whole or part as a local amenity in terms of its landscape qualities, its wildlife or ecological value...; or*
- *The land, in whole or part, is of notable wildlife significance;*

### **Wildlife Sites**

**9.15** Herts Ecology support the recognition given to ‘Wildlife Sites’ although the terminology used is confusing as currently presented. We advise that this section should be termed **‘Natural Environmental Resources’** or similar – primarily to avoid confusion with Wildlife Sites (also known as County Wildlife Sites or Local Wildlife Sites) and given that at least one SSSI is geomorphological in nature. There should also be a clear distinction between **Statutory Sites** – European sites (Special Area of Conservation), National sites (Sites of Special Scientific Interest) and Local Nature Reserves, and those that are **non-statutory sites** – Local / County Wildlife Sites.

Furthermore, the Ecological Network mapping was based upon identification of **Priority Habitats** reflecting both the generic importance of this resource identified

within the 2006 NERC Act as well as the landscape scale approach promoted as part of the NPPF. There are also many priority habitats that are not Wildlife sites (e.g. orchards, arable field margins) as well as other **local features** in the wider landscape that have a local or site value e.g. hedgerows or roadside verges. The role of all of these habitats in providing vital **ecosystem services** – such as pollination, water management and soil conservation - should also be mentioned as all of these contribute to natural environmental resources and should be reflected within the accompanying text.

**9.16** Herts Ecology believe that ‘Local Wildlife Sites’ can then be considered separately, although with less detail than currently described as we consider this is largely unnecessary. Herts Ecology consider the following statement should be sufficient to describe this non-statutory resource:

‘Local Wildlife Sites are administered through the Local Wildlife Sites Partnership which includes bodies including Herts and Middlesex Wildlife Trust, Herts Ecology and Natural England. A ratification panel provides expert opinion on identification of new sites and removal of sites no longer considered to meet the appropriate criteria, whilst a survey team provides monitoring of a number of sites each year. SSSIs, benefitting from full legal protection, have now been removed from the Local Wildlife Sites register (following national guidance) to avoid any duplication. Local planning authorities are informed annually of any changes to Local Wildlife Sites, including additions, deletions or modifications to site boundaries which reflect more accurate mapping. Maps of Local Wildlife Sites are available to be viewed at the Local Planning Authority or from Hertfordshire Environmental Records Centre, hosted by Herts and Middlesex Wildlife Trust’.

Herts Ecology do not consider it is appropriate to list changes to Local Wildlife Sites within a local plan document as some could be potentially subject to changes over a much shorter period of time than local plan development timescale or its subsequent reviews.

## **Sites outlined within the Plan**

### **10 Welwyn Garden City**

#### **10.8 Hal02 *Land at Waterside***

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: within 10m of Blackfan Valley Local Wildlife Site (our reference: 58/039) with mixed habitats including grassland, small woodlands and clustered trees, a large lake – although separated by a main road.

Other features: amenity grassland, occasional trees, small hedgerow.

Protected species: unlikely.

Opportunities: low.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

#### **10.9 Hal03 *Ratcliff Tail Lift Site***

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: developed site.

Protected species: unlikely.

Opportunities: low due to nature and size of site.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

#### **10.10 Hol19 *Hyde Valley House & First House***

*[Exact location unclear]*

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: developed site / amenity.

Protected species: unlikely.

Opportunities: low due to size and nature of site.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

#### **10.11 Pan01 *Land between Bericot Way and Waterbeach***

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: grassland and boundary with trees and shrubs.

Protected species: Probably birds in bordering tress.

Opportunities: Retain boundary trees and shrubs or compensate if lost.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

#### **10.12 Pan02 *Land behind 1-17 Poplars***

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: amenity grassland with a few scattered trees.

Protected species: none.

Opportunities: low due to size of site.  
Ecological sensitivity: low.  
Fundamental ecological constraint: none.

#### **10.13 Pea08 Land adjacent to Ravenfield Road**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: developed site.  
Protected species: unlikely.  
Opportunities: low due to nature and size of site.  
Ecological sensitivity: negligible.  
Fundamental ecological constraint: none.

#### **10.14 Pea24 St Michaels House and Day Centre, Holwell Road**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: developed site.  
Protected species: unlikely.  
Opportunities: low due to nature and size of site.  
Ecological sensitivity: negligible.  
Fundamental ecological constraint: Possible bat assessment if building is to be demolished.

#### **10.15 Pea94 Bridge Road East**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: developed site.  
Protected species: unlikely.  
Opportunities: low due to nature and size of site.  
Ecological sensitivity: negligible.  
Fundamental ecological constraint: none.

**10.17** Herts Ecology recognise the purposes of the Green Belt around Welwyn Garden City which seeks to prevent coalescence of settlements. To avoid incursions into this, we note that '*The only land available outside the settlement but not part of the Green Belt is at Panshanger Aerodrome*'. It would seem that there is no other option than to consider this open land resource if land of this extent needs to be identified without impacting upon the Green Belt.

#### **10.18 WGC1 Creswick**

Herts Ecology note that '*proximity to Wildlife Sites*' was raised as a concern. In fact one Local Wildlife Site will be affected along its northern edge due to the adjacent development and this should be buffered if possible. The majority of the Local Wildlife Site woodland will remain unaffected. We agree this is unlikely to prevent the site from coming forward so long as other linkages were not otherwise broken.

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: Adjacent to part of Creswick Plantation Local Wildlife Site (our reference: 57/046).

Other features: arable and agricultural land bordered and divided by hedgerows.

Protected species: unlikely.

Opportunities: Retain hedgerows or compensate for lost trees. There is potential for habitat or GI creation. Buffer with adjacent Local Wildlife Site.

Ecological sensitivity: low to locally moderate along hedgerows.

Fundamental ecological constraint: none apparent. May need to survey for reptiles if suitable habitat present.

### **WGC4 Panshanger Aerodrome**

**10.21** Herts Ecology note that the Plan states this site '*also provides opportunities to develop strategic green infrastructure links between Welwyn Garden City and Panshanger Park*'. Whilst we acknowledge this is possible surely this aim is compromised if half of the site is developed, particularly given that in its undeveloped state it provides that role currently. However, we support the masterplanning that will be required if this site does come forward for development and the '*green infrastructure provision and.....structural landscape belt*' that will be needed to be determined through this process. The site's developing ecological interest – although not recognised as a Wildlife Site – is considered to be linked with the grassland management (or relative lack of management) and relatively undisturbed nature. These are important aspects to be considered when developing future plans for the site if open areas are to remain.

Given the '*requirement to explore the feasibility of moving the runway to the north to allow for the provision of housing and the retention of the runway*' this may leave some undisturbed land associated with the runway to replace areas lost to development, given that access to functional airfield areas is likely to be restricted. Remaining open grasslands could be managed with biodiversity as a major consideration.

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: rough grassland with scattered trees.

Protected species: Bird records available. There is potential for reptiles.

Opportunities: potential for some habitat management / creation due to size of site.

Ecological sensitivity: low to locally moderate due to the large area of grassland.

Fundamental ecological constraint: Phase 1 survey to assess habitat value. Reptile surveys may be required if habitat is suitable.

### **WGC5 Land to the South East of Welwyn Garden City**

**10.23** Herts Ecology note that impact on Local Wildlife Sites was considered a concern and fully agree with this view. The Commons LNR will be entirely cut off from the existing open land to the east, although the southern edge will remain connected with the Commons Local Wildlife Site. This site is also all woodland habitat. Furthermore additional land to the south has been promoted for housing; this will further isolate the LNR as the boundary will then be the A414. This proposal

also conflicts with the proposed Green Infrastructure corridors, which show an east-west route through the proposed development areas.

Consequently Herts Ecology consider that an open corridor of some form is required to retain a direct link to open countryside to the east and for the immediate future – south to ensure a link to open land is retained for The Commons woodlands. The potential for some retaining a robust link for more mobile species with Hatfield Park to the south is also important.

In any event, additional housing will generate further pressure on the LNR. If the LNR is to retain its condition and quality, measures to enhance management and the ecological corridors will be required before Herts Ecology would support any development in this location.

Recognised ecology sites within Site: Ecosite: Old Filter Beds S. of Holwel Hyde Farm (our reference: 58/052).

Recognised sites adjacent / close to Site: Adjacent to The Commons, which is a Local Nature Reserve and Local Wildlife Site (our reference: 58/037).

Other features: arable.

Protected species: unlikely.

Opportunities: Potential for habitat creation due to size of site. Buffer adjacent Local Wildlife Site / LNR.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

#### **10.27 GTLAA06 is located within WGC4**

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: rough grassland, scattered trees.

Protected species: unlikely.

Opportunities: limited due to size of site.

Ecological sensitivity: low.

Fundamental ecological constraint: none apparent.

#### **Urban Open Land**

Herts Ecology support urban open spaces and any GI they can provide.

#### ***Chequersfield (Figure 16):***

**10.46** *It is proposed to designate two new UOLs in this housing development.*

#### **10.47 UOL221 St Joseph's Green**

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: amenity grassland, shrubs?

Protected species: none

Opportunities: limited due to size of site

Ecological sensitivity: none

Fundamental ecological constraint: none

#### **10.48 UOL222 Eddington Crescent**

Recognised ecology sites within Site: none

Recognised sites adjacent / close to Site: none

Other features: amenity grassland, some shrubs / scattered trees.

Protected species: none

Opportunities: limited due to size of site

Ecological sensitivity: none

Fundamental ecological constraint: none

#### **Former Sir John Newsom School Site (Figure 17):**

*Two designations are proposed for this development*

#### **10.49 UOL223 Lawrence Hall End**

Recognised ecology sites within Site: none

Recognised sites adjacent / close to Site: none

Other features: amenity grassland, hedgerows, trees and shrubs, large pond, area of playground and hardstanding.

Protected species: potential for birds in trees, otherwise unlikely

Opportunities: potential for habitat management / creation. Retain trees, especially along western and southern boundaries.

Ecological sensitivity: low

Fundamental ecological constraint: Phase 1 survey to assess habitat value.

#### **10.50 UOL224 Kenyon Place, Twelve Acres**

Recognised ecology sites within Site: none

Recognised sites adjacent / close to Site: none

Other features: amenity grassland and planting

Protected species: unlikely

Opportunities: low due to size of site

Ecological sensitivity: low

Fundamental ecological constraint: none

#### **10.51 UOL80 Herts Wood/Disused Railway line behind Knella Road (Figure 18)**

Herts Ecology agree with proposed boundary amendments.

Recognised ecology sites within Site: Watch Mead Disused Railway Local Wildlife Site (our reference: 58/054)

Recognised sites adjacent / close to Site: none

Other features: grassland, woodland and scrub.

Protected species: there is potential for birds in trees. Also potential for reptiles.

Opportunities: Retain as many trees / scrub as possible. Needs managing as a UOL

Ecological sensitivity: locally moderate.

Fundamental ecological constraint: Local Wildlife Site. Phase 1 to assess habitat interest. Reptile surveys may be needed if habitat is suitable.

## **11 Hatfield**

### **11.7 HE23 *Factory adjacent to Wellfield Road depot***

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: developed site.  
Protected species: none.  
Opportunities: negligible.  
Ecological sensitivity: none.  
Fundamental ecological constraint: none.

### **11.8 HS12 *Garages off Garden Avenue***

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: developed site.  
Protected species: none.  
Opportunities: negligible.  
Ecological sensitivity: negligible.  
Fundamental ecological constraint: none.

### **11.9 HS31 *Garages off Hollyfield***

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: developed site.  
Protected species: none.  
Opportunities: negligible.  
Ecological sensitivity: negligible.  
Fundamental ecological constraint: none.

### **11.10 HW12 *Land North of Toms Field***

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: grassland, hedgerows, scattered trees.  
Protected species: there is potential for birds in trees. There may be potential for reptiles depending on habitat.  
Opportunities: moderate. Retain hedgerows (especially those on western side) and trees or compensate if lost. Former allotment site (?) so potential for orchard creation. GI link.  
Ecological sensitivity: locally moderate due to nature of habitat.  
Fundamental ecological constraint: Phase 1 survey to assess habitat value. Reptile survey may be required depending on habitat suitability.

**11.13 Hat1 North West Hatfield** received a large number of responses to the previous consultation, including the impact on the environment. Herts Ecology agree, in that there will be a severe indirect impact on the newly created resource of Ellenbrook Park should this site be developed given that it will effectively isolate the Park. However all of the affected land is intensively farmed and of little intrinsic ecological interest.

The loss of this open land resource cannot be addressed by detailed masterplanning if the principle intention is to develop the area for housing although measures to provide GI can be developed.

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: arable, drain through part of site with marginal vegetation and some trees, more established hedgerow along Great Braitch Lane.

Protected species: unlikely.

Opportunities: Low, but some potential for habitat creation and GI as site is large.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

**11.15** There is no existing, clear strategic green corridor between Ellenbrook and Panshanger; the principle unifying feature is the River Lea corridor to the north and any direct links eastwards are compromised by the A1, and will be further compromised by development proposed at WGC5.

Herts Ecology consider that very limited corridors - depending on the layout and density of development – could be identified by appropriate masterplanning, although these will be limited in extent and impact given the inevitable limitations on management and recreational pressure. Herts Ecology would expect to see credible GI provided as proposed in support of any such development.

#### **11.17 Hat2 West Hatfield**

Ellenbrook Park consists of the large, relatively undisturbed expanses of open grassland on the former airfield site. If the proposed allocation comes forward, this resource will be lost.

However, these areas – whilst supporting increasingly valuable bird communities – have not in themselves been formally recognised for their intrinsic habitat value, which will continue to develop with appropriate management. It is, however, important that the associated impact on Home Covert & Round Wood Local Wildlife Site (our reference: 68/009) will need addressing.

The need for identifying housing land will need to be weighed against the retention of any form of existing park, particularly given that much of what would remain will be dug for gravel anyway. Herts Ecology consider that appropriate offsetting will be required to compensate for the loss of the currently ecologically developing land.

**11.19** Herts Ecology agree that development of the site would have a significant impact on the Green Belt and result in the loss of a large part of the Country Park. Herts Ecology consider that the proposal to create a development within a landscaped environment cannot replicate the existing nature, areas and ecology of the open grasslands, however well designed the urban GI will be. The reduction in area to reduce the impact on the Local Wildlife Site is welcomed although this will have a relatively limited impact – and will leave more of the existing park available for gravel extraction.

Herts Ecology support any meaningful link between Ellenbrook and Panshanger but this would need to be demonstrated in some detail before we would consider a genuine ecological corridor will result.

**Site Hat2** is considered more favourable for a number of reasons although Herts Ecology believe that there would be a significant environmental and amenity cost should this site be developed, and would necessitate offsetting which has not otherwise been proposed. Herts Ecology consider this approach should be integral to developing the Masterplan for the site and the Supplementary Planning document (SPD) or Area Action Plan (AAP).

Recognised ecology sites within Site: Ecosite: Ellenbrook Fields (our reference: 68/105).

Recognised sites adjacent / close to Site: Adjacent to Local Wildlife Site: Home Covert & Round Wood (our reference: 68/009).

Other features: rough grassland, limited scattered scrub.

Protected species: there is potential for reptiles.

Opportunities: high potential for habitat creation and GI as site is large. Habitat for Small Heath butterfly (a NERC species). Buffer with adjacent Local Wildlife Site

Ecological sensitivity: locally moderate as large grassland site. Habitat for Small Heath butterfly.

Fundamental ecological constraint: within Ecosite. Need to check date of last ecological survey or Phase 1 survey may be required to assess habitat value. Reptiles survey may be required if habitat is suitable.

### **Urban Open Land**

Herts Ecology support the intention of providing urban open land and any GI they can provide.

## **12 Woolmer Green**

### ***12.8 WGr1 East of Great North Road***

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: arable.

Protected species: none likely.

Opportunities: limited.

Ecological sensitivity: none.

Fundamental ecological constraint: none.

## **13 Oaklands and Mardley Heath**

### ***13.7 WE01 52 Great North Road***

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: largely residential?

Protected species: potential for birds in trees. Potential for bats unknown.  
Opportunities: low due to size of site. Retain trees if of value.  
Ecological sensitivity: low unless bats present in buildings.  
Fundamental ecological constraint: buildings may need bat assessment if they are to be demolished.

### **13.8 WN11 17 *Canonsfield Road***

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: largely residential?  
Protected species: potential for birds in trees. Potential for bats unknown.  
Opportunities: low due to size of site. Retain trees if of value.  
Ecological sensitivity: low unless bats present in buildings.  
Fundamental ecological constraint: buildings may need bat assessment if they are to be demolished.

### **13.11 *OMH5 Land rear of 2-12 Great North Road and OMH8 2 Great North Road***

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none. Part of Danesbury Park Local Nature Reserve lies 60m to the west, however the A1(M) separates the two.  
Other features: woodland, densely wooded gardens, scrub and scattered trees.  
Protected species: there is potential for birds in the trees. They may be potential for roosting bats.  
Opportunities: Retain native trees or compensate for loss of trees / woodland.  
Ecological sensitivity: high potential for woody habitat creation / management.  
Fundamental ecological constraint: Phase 1 survey to assess habitat value. This should include assessment of trees for bats.

## **Gypsy and Traveller sites**

### **13.13 *GTLAA04 Four Oaks***

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: adjacent to the northern end (40m) of a 300m long Local Wildlife Site known as “Old North Road & Central Reservation, Lockleys” (our reference: 43/032).  
Other features: predominantly bare ground. Developed site (Gypsy and Traveller site). An area of grassland and species-poor hedgerow. Bordered on the west side by the woody banks of the A1(M).  
Protected species: unlikely.  
Opportunities: Limited. Buffer with adjacent Local Wildlife Site.  
Ecological sensitivity: low.  
Fundamental ecological constraint: none apparent.

## **Village Centre**

### ***Policy Intention SADM15 Oaklands & Mardley Heath Oaklands & Mardley Heath - Small Village Centre***

Sponsored by the following LPAs:  
HERTFORDSHIRE COUNTY COUNCIL,  
DACORUM BOROUGH, EAST HERTFORDSHIRE DISTRICT, HERTSMERE BOROUGH, NORTH HERTFORDSHIRE DISTRICT,  
ST ALBANS DISTRICT, THREE RIVERS DISTRICT, WATFORD BOROUGH, WELWYN HATFIELD BOROUGH

Herts Ecology support the suggestion that “...a small wooded area which does not require inclusion”.

## **14 Welwyn**

### **14.9 Wel3 School Lane**

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: scattered and clustered trees, amenity grassland.

Protected species: possibly birds otherwise none.

Opportunities: limited as partly developed land. Compensate for any loss of trees.

Ecological sensitivity: low to locally moderate if trees removed.

Fundamental ecological constraint: Phase 1 survey of habitats to assess value.

### **14.10 Wel4 Sandyhurst**

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: There is a Local Wildlife Site, Sandybottom Wood (our reference: 43/003), 60m to the east, however the A1(M) separates the two. There is a large 15 ha Ecosite (The Frythe, Horseshoes Plantation Cook's Wood our reference: 43/004) 50m to the south-west, which has large areas of woodland and grassland as well as scattered trees and scrub.

Other features: area of woodland, rough grassland, a dwelling with associated hardstanding / parking, gardens.

Protected species: there is potential for birds in trees. Rough ground may attract reptiles.

Opportunities: retain trees or compensate for loss of trees.

Ecological sensitivity: locally moderate if trees removed.

Fundamental ecological constraint: Phase 1 survey to assess value of grassland and other habitats on site. Reptile survey may be required depending on the nature of habitats present.

### **14.11 Wel11 The Vineyards, Codicote Road**

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: adjacent to Danesbury Park Local Nature Reserve and Local Wildlife Site (our reference: 43/016).

Other features: grassland, woodland, scattered trees, mixed hedgerows. From aerial photography, the habitat looks similar to that of Danesbury Park adjacent.

Protected species: there is potential for birds in trees. Also possibly reptiles.

Opportunities: Retain trees or compensate for loss. Habitat creation / management for grassland. Buffer with adjacent Local Wildlife Site / LNR.

Ecological sensitivity: appears moderate.

Fundamental ecological constraint: Phase 1 survey to assess value of habitats.

Reptile surveys may be needed if habitat is suitable.

## **Urban Open Land**

### **14.20 UOL225 Node Way Gardens, Welwyn**

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: amenity grassland.  
Protected species: none.  
Opportunities: limited due to size of site.  
Ecological sensitivity: low.  
Fundamental ecological constraint: none.

### **15 Digswell**

No sites.

## **16 Welham Green**

### **16.9 WeG1 Welham Manor House**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: none.  
Protected species: unlikely.  
Opportunities: none due to small size and previously developed site.  
Ecological sensitivity: none.  
Fundamental ecological constraint: none.

### **16.10 WeG2 Welham Manor Grounds**

*Boundary unclear therefore similar comments as WeG3:*

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: woodland, scrub, boundary hedgerows? grassland?  
Protected species: there is potential for birds in hedgerow trees and in the woodland / scrub. Reptile possible as site is adjacent to allotments.  
Opportunities: Habitat management / creation of woodland or compensate for loss of trees.  
Ecological sensitivity: High if woodland will be lost.  
Fundamental ecological constraint: Phase 1 survey needed to assess interest.  
Reptile surveys needed and compensation if justified.

### **16.11 WeG3 South of Welham Manor**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: grassland, boundary hedgerows, scattered trees, woodland?, scrub?  
Protected species: there is potential for birds in hedgerow trees. Reptile possible as site is adjacent to allotments and wider countryside (albeit arable on two sides).  
Opportunities: Habitat creation of grassland. Retain hedgerows and trees, or compensate for loss of trees.  
Ecological sensitivity: low to moderate.  
Fundamental ecological constraint: Phase 1 survey needed to assess interest.  
Reptile surveys needed and compensation if justified.

### **16.12 WeG6 Skimpans Farm**

Sponsored by the following LPAs:  
HERTFORDSHIRE COUNTY COUNCIL,  
DACORUM BOROUGH, EAST HERTFORDSHIRE DISTRICT, HERTSMERE BOROUGH, NORTH HERTFORDSHIRE DISTRICT,  
ST ALBANS DISTRICT, THREE RIVERS DISTRICT, WATFORD BOROUGH, WELWYN HATFIELD BOROUGH

Recognised ecology sites within Site: De-selected Local Wildlife Site (in 2012) which is now an Ecosite (our reference: 69/017).

Recognised sites adjacent / close to Site: Adjacent to grassland Ecosite, known as "Playing Field near Skimpan's Farm" (our reference: 69/024).

Other features: grassland, scrub, woodland along drains around Community Centre at southern end of site.

Protected species: potential for birds in trees otherwise low.

Opportunities: low as survey confirmed degraded grassland in 2012. Retain trees or compensate for loss. GI potential along banks of railway on eastern edge.

Ecological sensitivity: low.

Fundamental ecological constraint: within Ecosite - protect habitat on railway banks.

### **16.13 WeG10 Dixons Hill Road**

Recognised ecology sites within Site: none

Recognised sites adjacent / close to Site: Local Wildlife Site: Bush Wood (Welham Green) (our reference: 69/009).

Other features: poor grassland, scattered trees.

Protected species: none likely.

Opportunities: potential for habitat creation - wild flower meadow, pond, hedgerows, tree planting, community orchard, etc. Buffer adjacent Local Wildlife Site.

Ecological sensitivity: none.

Fundamental ecological constraint: buffer needed between any development and the woodland Local Wildlife Site.

### **16.16 GTLAA01 Foxes Lane**

Recognised ecology sites within Site: none

Recognised sites adjacent / close to Site: Ecosite: Fox Lane (our reference: 69/039).

Other features: largely bare ground, wooded boundary on south-west edge along railway bank.

Protected species: possibly birds, possibly reptiles.

Opportunities: Habitat creation potential for grassland or woodland. Buffer Ecosite.

Retain boundary along railway bank.

Ecological sensitivity: Railway bank vegetation only.

Fundamental ecological constraint: Reptile survey may be required depending on habitat condition.

### **16.17 GTLAA02 Highdene**

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: Local Wildlife Site: Marshmoor Lane Grassland Strip (our reference: 69/038).

Other features: grassland with hedgerows around whole site, scattered trees.

Protected species: possibly birds in trees / scrub, otherwise unlikely.

Opportunities: Habitat creation potential grassland. Retain hedgerows. Buffer Local Wildlife Site.

Ecological sensitivity: low as bare patches / disturbed area in centre of site.

Fundamental ecological constraint: None apparent.

### **16.18 GTLAA03 The Willows, Marshmoor Lane**

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: Local Wildlife Site within 75m: Marshmoor Lane Grassland Strip (our reference: 69/038).

Other features: none.

Protected species: unlikely.

Opportunities: limited due to size of site.

Ecological sensitivity: low.

Fundamental ecological constraint: highly unlikely.

**16.22** Herts Ecology consider that development here is likely to have some impact on Millwards Park Local Wildlife Site (our reference: 69/038) to the east although this is separated by a main road and some areas of existing development. There is also an existing Local Wildlife Site within this area – although apparently now rather degraded due to over-grazing. Some other areas of grassland may meet Local Wildlife Site status if grazing were to be relaxed and these would need to be fully considered if any development options were proposed. The area does provide a buffer for the Hatfield Estate to the east.

## **17 Brookmans Park**

### ***17.7 BPLH44 1-12 Green Close***

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: rough ground and scrub in south-west corner of site.

Protected species: Possibly birds in trees / scrub; and reptiles associated with railway banks.

Opportunities: retain vegetation on southern and western boundaries.

Ecological sensitivity: low to locally moderate depending on species survey results.

Fundamental ecological constraint: Bat assessment of the 12 buildings to be demolished. Reptile survey and subsequent translocation if present.

### ***17.10 BrP14 Land East of Golf Club Road***

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: Local Wildlife Site: George's Wood (our reference: 79/012).

Other features: grassland and scattered trees.

Protected species: Possibly birds otherwise unlikely.

Opportunities: retain trees. High priority for habitat creation for grassland and woodland; possibly an orchard due to proximity to housing. Buffer Local Wildlife Site.

Ecological sensitivity: low.

Fundamental ecological constraint: Highly unlikely.

## **18 Little Heath**

### ***18.7 BPLH30 Land to the rear of Builders Arms Public House***

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: none.

Protected species: none likely.  
Opportunities: limited due to size of site.  
Ecological sensitivity: none.  
Fundamental ecological constraint: none.

#### **18.10 LHe1 Land North of Hawkshead Road**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: woody boundary on southern edge and small copse on western side.  
Protected species: Birds possible in trees, otherwise none likely.  
Opportunities: limited. Grassland habitat creation potential.  
Ecological sensitivity: locally moderate southern woody boundary.  
Fundamental ecological constraint: southern woody boundary.

#### **18.11 BrP7 Land South of Hawkshead Road**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: Ecosite: Fields South of Bolton's Park (our reference: 79/028).  
Other features: grassland with area of trees / scrub towards north-west edge; and small pond. Grazed? There are records of orchards to the east.  
Protected species: birds possible in trees / scrub, otherwise low.  
Opportunities: retain trees / scrub and pond or compensate for loss. Habitat management / creation potential for grassland, trees, scrub and/or an orchard. Buffer the nearby Ecosite.  
Ecological sensitivity: low in grassland area, locally moderate in woody area. Nesting birds.  
Fundamental ecological constraint: Phase 1 survey required to assess value.

### **19 Cuffley**

#### **19.7 No02 36 The Ridgeway**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: Local Wildlife Site: Home Wood (Cuffley) (our reference: 79/007).  
Other features: half of site is scrub / rough grass.  
Protected species: birds likely, reptiles possible.  
Opportunities: compensation or retention of some scrub as boundary feature, especially along western boundary with adjacent Local Wildlife Site. Habitat management / creation potential for woodland.  
Ecological sensitivity: locally moderate given loss of large area of scrub and potential bird & reptile interest.  
Fundamental ecological constraint: Phase 1 survey to assess value. Nesting birds. Reptile survey may be required depending on habitat condition. Avoid damage / lighting to adjacent woodland WS

#### **19.8 No10 Land west of St Martin de Porres Catholic Church**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.

Other features: some scrub on site.  
Protected species: possibly nesting birds, otherwise highly unlikely.  
Opportunities: limited given size of site.  
Ecological sensitivity: low.  
Fundamental ecological constraint: possibly nesting birds otherwise none.

### **19.11 Cuf1 The Meadway**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: Ecosite: Pasture by Burleigh Cottage (our reference: 80/066).  
Other features: limited as whole site is intensive arable. Scrub on western side, Cuffley Brook on north-east side.  
Protected species: unlikely.  
Opportunities: limited – buffer north-east edge with Cuffley Brook and Ecosite.  
Ecological sensitivity: low.  
Fundamental ecological constraint: avoid lighting north-east boundary features, otherwise none apparent.

### **19.12 Cuf6 East of Northaw Road East**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: limited as whole site is intensive arable. Hedgerows and wooded boundaries including railway banks on east side.  
Protected species: unlikely unless reptiles associated with railway.  
Opportunities: limited to moderate – buffer with railway bank and southern woody boundary.  
Ecological sensitivity: low.  
Fundamental ecological constraint: none apparent.

## **21 Cemeteries**

### **Site CEM01**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: rough grassland, mixed hedgerow surrounds site.  
Protected species: Great crested newts possible as within 150m of breeding pond.  
Opportunities: considered to be in a high priority for habitat creation. Site surrounded by rough grassland on most sides.  
Ecological sensitivity: low unless Great crested newts present.  
Fundamental ecological constraint: Great crested newt survey needed. Boundary hedgerows should be retained.

### **Site CEM02**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: arable field.  
Protected species: none.  
Opportunities: low.

Ecological sensitivity: low.  
Fundamental ecological constraint: none.

**21.6** *“..... the land at South Way is the preferred option of the council's Environmental Services team.”*

Although the preferred site appears to be CEM01, this is ecologically the better site and Herts Ecology would prefer to see CEM02 used.

## **22 Development Management Policies**

### **Policy reference SADM4 Health Impacts and Pollution**

In respect of this Policy, whilst Herts Ecology endorse the issue regarding pollution, we would also point out that impacts from such pollution are not those which affect the human environment as implied; both water pollution and light pollution can have considerable impacts locally biodiversity and is a consideration which must be reflected within the Policy justification and objectives.

### **Policy Reference SADM8 Environmental Assets and Resources**

Hertfordshire Ecology support the policy intent to ensure there is no significant adverse impact upon Urban Open Land, landscape character and biodiversity. All of these can have ecological implications by impacting upon areas of known value, of likely value in urban environments and the nature of those resources. It should be remembered that biodiversity in some form occurs on most if not all areas of land and should be a generic consideration wherever possible.

Herts Ecology would expect to see development management policies which reflected the provisions as set out within NPPF. Consequently determination of planning applications should seek to ensure the following:-

- Protection and enhancement of biodiversity assets, minimising impacts and providing net gains including Green Infrastructure and ecological networks;
- Applications will usually be refused if significant harm or degradation to irreplaceable habitats – particularly SSSIs - cannot be avoided, mitigated or compensated, unless need outweighs loss;
- Recognise the hierarchy of sites such that protection is commensurate with status, giving appropriate weight to their importance and contribution to ecological networks;
- Recognise the landscape scale approach using maps of sites and networks of corridors, stepping stones and areas for restoration / creation;
- Seek to preserve, restore and re-create priority habitats, networks and priority species associated with developments. Applications to conserve and enhance biodiversity should be approved;
- Prevent harm to geological conservation interests;
- Guard against pollution, in particular limit impact of light pollution on biodiversity.

The **mitigation hierarchy** of avoidance, mitigation and compensation should be applied when determining planning applications. Biodiversity assets will also include legally Protected Species which will be a material consideration in determining planning applications. Other considerations will include the provision of suitable buffers against important habitat features, enhancement opportunities to provide a net gain in resources where possible and maintenance of ecosystem services.

Suitable landscaping design and management can help to provide these although this may also include the use of **Biodiversity Offsetting** measures and guidance to provide the nature, extent and location of ecological compensation. These may require the establishment of credible management mechanisms through the use of S106 Agreements of Community Infrastructure Levy to ensure conservation and enhancement measures are delivered. The Hertfordshire Ecological Networks mapping will also help in guiding any such opportunities.

Development proposals will be expected to follow, and be determined in accordance with, **best practice**. These are outlined within a variety of guidance, including:

- The British Standards Institution's Biodiversity – Code of Practice for Planning and Development BS 42020:13;
- Chartered institute of Ecology and Environmental Management - Technical Guidance
- Natural England's Standing Advice

#### **Policy Reference SADM19 Hatfield Aerodrome Masterplan**

This Policy must recognise the existing role and intent of Ellenbrook Country Park and its likely future, as well as its developing and planned ecological value. If the biodiversity resource is going to be degraded - which is highly likely to be the case – development will be required to provide appropriate offsetting provisions.

#### **Saved Policies**

**R6.** Herts Ecology consider it is not unreasonable to replace Policy R6 River Corridors by CS11: the Protection of Critical Assets in the Emerging Core Strategy, as long as these critical assets are deemed to include River Corridors.

**R11** Herts Ecology consider it is not unreasonable to replace Policy R11: Biodiversity and Development by CS9: Good Quality Design, CS10: Sustainable design and construction in the Emerging Core Strategy and Environmental Assets and Resources SADM8 given the separation of Strategic and Development Management Policies, as long as the topic is adequately reflected in both.

**R13 and R14** Herts Ecology consider it is not unreasonable to replace Policy R13: Sites of Special Scientific Interest and Policy R14: Local Nature Reserves with CS11: Protection of Critical Assets in the Emerging Core Strategy and included on the Policies Map. These sites have formal legal protection and as such are needed to be formally recognised within the planning process

**R15** Policy R15 relates to Local Wildlife Sites, which are non-statutory and infer no controls or other formal influence on site management. Given their essential role in contributing to biodiversity outside statutory sites, Herts Ecology consider that whilst they must be publicly recognised, they are less appropriate for including on a formal Policies Map. Their boundaries or existence are considerably less secure within the Plan period given the modifications that may be needed as more information becomes available or technology improves regarding their mapping. Consequently whilst we recognise they are a critical ecological asset – given, for the most part, their interest is largely irreplaceable - their representation on proposals maps may not be the most appropriate means of presenting them. LPAs are informed and updated annually as to changes in boundaries or sites and this is the information that needs to be readily available on request, either from the LPA or the Hertfordshire Environmental Records Centre.

**R17** Herts Ecology consider it is not unreasonable to replace Policy R17: Trees, Woodland and Hedgerows by CS9: Good Quality Design and CS11: the Protection of Critical Assets in the Emerging Core Strategy, as long as these assets are deemed to include these features. We also note they are also referred to in General Criteria Policy SADM2 Amenity.

**R20** Herts Ecology consider it is not unreasonable to replace Policy R20: Light Pollution with Policy SADM4 on health impacts, although we consider that ecological impacts should also be referred to when a more generic policy on pollution is written as impacts are wider than for just human health, as outlined above.

**R28** Herts Ecology consider it is not unreasonable to replace Policy R28: Historic Parks and Gardens by CS11: the Protection of Critical Assets in the Emerging Core Strategy and a new policy on Heritage Assets SADM7 as long as these assets are deemed to be included. Some sites will benefit from Statutory protection whilst others may not; however in most cases there may also be significant ecological features present, such as veteran trees, wood pasture habitat, park banks, water bodies, orchards, old walls and old grasslands.

**M15** Any policy relating to Panshanger Airfield must fully consider the nature of the existing ecological and developing interest, the future function and development of the site both in terms of housing or continued airfield use – and what ecological compensation and management of the site may be appropriate.

**D8** Herts Ecology consider it is not unreasonable to replace Policy D8: Landscaping by CS9: Good Quality Design in the emerging Core Strategy and SADM2 Residential Amenity. However, we consider that reference should be made to landscape and local ecological character in influencing landscape design where appropriate, as this can have a considerable impact on the delivery of other ecological and wider environmental objectives.

**OS1** Herts Ecology consider that it is not unreasonable to replace Policy OS1: Urban Open Land by CS11: Protection of Critical Assets and SADM8 Environmental Assets and Resources. Ecology and ecosystem services can benefit from provision of open

space within urban areas, particularly as corridors or stepping stones, even if management of such spaces is largely for amenity purposes. Any loss should be resisted or compensated by enhanced management of other or any remaining areas.

**OS4** Herts Ecology consider that it is not unreasonable to replace Policy OS4: Allotments by CS11: Protection of Critical Assets and SADM8 Environmental Assets and Resources. Ecology and ecosystem services can benefit from provision of allotments, particularly reptiles and pollination. Sites can also function as parts of corridors or stepping stones, even if management of such spaces is largely for horticultural purposes. Any loss should be resisted or compensated by replacement elsewhere.

**RA11** Herts Ecology consider that it is not unreasonable for Policy RA11: Watling Chase Community Forest to be rolled forward into new policy SADM8: Environmental Assets and Resources, as long as Watling Chase is deemed to be included within the assets described. The role of new woodland and associated land can be highly beneficial to ecology if management can reduce or limit associated disturbance.

**RA15** Herts Ecology consider it is not unreasonable to replace Policy RA15: Agricultural Land by CS11: the Protection of Critical Assets in the Emerging Core Strategy, as long as these assets are deemed to include this feature. Retaining genuine farmland helps to maintain a genuine rural function and character and can also have ecological benefits where less intensive management techniques are employed. This should include all types of agricultural land, whether arable or other crops or livestock.

**RA24** Herts Ecology consider it is not unreasonable to roll forward Policy RA24: Riding and Livery Stables into new policy SADM6: General Criteria – Development in the Green Belt which impacts on openness. Equine establishments and their associated land management can have a considerable impact locally on ecological resources in addition to impacting physically on openness in such areas. Consequently they need to be a planning consideration in any event.

## **A Finely balanced housing sites**

**A.4 Southern part of WGC5** Herts Ecology note it remains uncertain as to what extent the southern part of WGC5 can be developed as a consequence of contamination from landfill on adjoining land. If WGC5 comes forward, this area is strategically valuable in providing an ecological resource to help link with the Commons LNR. Its appropriate management for biodiversity should be secured if possible to enhance the remaining development and reduce the ecological isolation of the LNR from open countryside to the north-east.

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: adjacent to Ecosite: Land SW of Birchall Lane, Cole Green Pits (our reference: 58/004/02) and part of Local Wildlife Site: The Commons (our reference: 58/023); also close to Ecosite Gypsy Lane Golf Course (our reference 58/005).

Other features: largely arable, small copse with three ponds and drain, and an area of rough grassland.

Protected species: unlikely. There is potential for birds in trees.

Opportunities: potential habitat creation due to large size of site. Buffer adjacent sites of ecological interest.

Ecological sensitivity: low.

Fundamental ecological constraint: none apparent.

#### **A.6 North eastern part of Hat 1**

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: arable or agricultural grassland.

Protected species: unlikely.

Opportunities: potential for habitat creation as site is large.

Ecological sensitivity: low.

Fundamental ecological constraint: none apparent.

**A.7 Southern part of Hat2.** Development of HAT2 would result in the loss of a large part of Ellenbrook Country Park, but Herts Ecology acknowledge excluding the southern section would secure more of the park and reduce impacts on the Local Wildlife Site. This must, however, be seen in the context of potential mineral extraction which could also destroy this area of open grassland in due course. In any event, the retention of this area will have limited impacts due to its size and increased recreational pressure.

Recognised ecology sites within Site: within Ecosite: Ellenbrook Fields (our reference: 68/105).

Recognised sites adjacent / close to Site: Adjacent to part of Local Wildlife Site: Home Covert & Round Wood (our reference: 68/009).

Other features: grassland.

Protected species: there is potential for reptiles and Great crested newts \*there is a breeding pond within 500m).

Opportunities: potential for habitat management / creation as site is large. Buffer with Local Wildlife Site.

Ecological sensitivity: moderate.

Fundamental ecological constraint: within Ecosite - Phase 1 survey to assess habitat interest. Reptile and Great crested newt surveys may be required and mitigation for if present.

#### **A.8 Hat4 South of Ellenbrook**

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: arable.

Protected species: none.

Opportunities: low.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

#### **A.9 Hat5 North of Roehyde**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: Adjacent to Local Wildlife Site: Copse at Nast Hyde (our reference: 69/022).  
Other features: arable.  
Protected species: none.  
Opportunities: low but buffer with adjacent Local Wildlife Site.  
Ecological sensitivity: low.  
Fundamental ecological constraint: none.

#### **A.11 Wel1 Land at Kimpton Road**

Recognised ecology sites within Site: none.  
Recognised sites Adjacent / close to Site: Adjacent to Ecosite: Cemetery in Welwyn (our reference: 43/053).  
Other features: arable.  
Protected species: none.  
Opportunities: potential for habitat creation as site is large. Buffer with Ecosite to the east.  
Ecological sensitivity: low.  
Fundamental ecological constraint: none.

#### **A.12 Wel2 Land East of Welwyn Cemetery**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: Adjacent / close to Site: Adjacent to Ecosite: Cemetery in Welwyn (our reference: 43/053).  
Other features: agricultural grassland?  
Protected species: unlikely.  
Opportunities: buffer with Ecosite on the western boundary.  
Ecological sensitivity: low.  
Fundamental ecological constraint: low.

#### **A.14 WeG4a Marshmoor**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: Adjacent to Local Wildlife Site: Marshmoor Lane Grassland Strip (our reference: 69/038).  
Other features: partly developed, partly amenity grassland / garden. Bordered by hedgerows.  
Protected species: Potential for birds in trees otherwise unlikely.  
Opportunities: Retain tress / hedgerows. Buffer with adjacent Local Wildlife Site.  
Ecological sensitivity: low.  
Fundamental ecological constraint: none apparent.

#### **A.16 BrP1 Land at Bell Lane**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: rough grassland, scattered trees.  
Protected species: there is potential for reptiles.  
Opportunities: potential for habitat creation.  
Ecological sensitivity: low?

Fundamental ecological constraint: Reptile survey may be required if habitat is suitable.

#### **A.17 BrP4 West of Brookmans Park**

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: Adjacent to Local Wildlife Site: Brick Kiln Wood (nr Brookmans Park) (our reference: 78/016) and Ecosite: Grassland E. of Brick Kiln Wood (our reference: 78/053).

Other features: arable. One central tree present.

Protected species: none.

Opportunities: potential for habitat creation. Buffer with adjacent Local Wildlife Site and Ecosite.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

#### **A.18 BrP6 Land at Bluebridge Road**

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: arable, five scattered trees.

Protected species: none.

Opportunities: potential for grassland creation.

Ecological sensitivity: low.

Fundamental ecological constraint: low.

#### **A.19 BrP12 Peplins Wood**

Recognised ecology sites within Site: Ecosite: Meadow S. of Peplin's Wood (our reference: 78/063).

Recognised sites adjacent / close to Site: Adjacent to Local Wildlife Site: Peplin's Wood (our reference: 78/021), and Ecosite: Brookmans Park Golf Course (our reference: 78/064).

Other features: grassland.

Protected species: within 500m of Great crested newt breeding pond.

Opportunities: GI link between sites of ecological interest. Buffer with adjacent County Wildlife Site and Ecosite.

Ecological sensitivity: moderate.

Fundamental ecological constraint: within Ecosite - Great crested newt survey may be required.

### **B Less favourable sites**

#### **B.4 WGC3 The Holdings, Cole Green Lane**

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: Adjacent to Ecosite: Land SW of Birchall Lane, Cole Green Pits (our reference: 58/004/02). Separated from a County Wildlife Site by Cole Green Lane - Rolls & Blackthorn Woods (our reference: 58/020).

Other features: disturbed ground, bare ground, some grassland and trees / scrub.

Protected species: Great crested newts have been recorded in the area but current terrain is not particularly favourable for them.

Opportunities: Potential for grassland creation.  
Ecological sensitivity: low.  
Fundamental ecological constraint: Possibility of Great crested newts.

**B.5 WGC6 East of Digswell Hill** Herts Ecology acknowledge the planning considerations outlined for this less favourable site, and would be supportive of no development in this location. This would have a negative impact on the network of Local Wildlife Sites in this area, increasing their effective fragmentation and also isolation of Sherrardspark Wood SSSI, now bordered by WGC and the A1.

Recognised ecology sites within Site: none  
Recognised sites adjacent / close to Site: adjacent to two County Wildlife Sites - Malm's Wood (our reference: 57/017) and Sandybottom Wood (our reference: 43/003).  
Other features: grassland, scattered trees, bare ground, wooded bank bordering A1(M), scrub.  
Protected species: Badgers in the area. Probably birds in trees.  
Opportunities: moderate for grassland and woodland creation due to surrounding habitats.  
Ecological sensitivity: low to locally moderate  
Fundamental ecological constraint: Phase 1 survey to assess habitat value. Badger survey needed.

**B.7 Hat3 West of Ellenbrook** Herts Ecology agree that this development site would further degrade the extent of the gaps between Hatfield and St Albans and is likely to have negative ecological impacts on old or rough grasslands. Although much of the area is arable the grounds of Great Nast Hyde House may be locally valuable, as is the strip to the NE bordering the existing developed area.

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: adjacent to Pasture W. of Nast Hyde Farm (our reference: 69/047) and separated by Ellenbrook Fields Ecosite (our reference: 68/105) by Hatfield Road.  
Other features: arable.  
Protected species: unlikely.  
Opportunities: retain boundary hedgerows.  
Ecological sensitivity: NERC Act butterflies use elms in hedgerows.  
Fundamental ecological constraint: none.

### **B.8 Hat11 South of Hatfield**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: grassland, mixed hedgerows.  
Protected species: birds in trees.  
Opportunities: Retain hedgerows. Grassland creation.  
Ecological sensitivity: western hedgerow boundary.  
Fundamental ecological constraint: Phase 1 habitat survey to assess value.

### **B.9 Hat12 Nast Hyde Farm**

Sponsored by the following LPAs:  
HERTFORDSHIRE COUNTY COUNCIL,  
DACORUM BOROUGH, EAST HERTFORDSHIRE DISTRICT, HERTSMERE BOROUGH, NORTH HERTFORDSHIRE DISTRICT,  
ST ALBANS DISTRICT, THREE RIVERS DISTRICT, WATFORD BOROUGH, WELWYN HATFIELD BOROUGH

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: Adjacent to County Wildlife Site Southway - Southern Road Verge (our reference: 69/046), and two Ecosites: Traveller's Lane Grassland and Ponds (our reference: 69/046) and New Barnfield Plantation (our reference: 69/035).

Other features: rough grassland, hedgerows.

Protected species: unlikely – possibly birds in trees.

Opportunities: potential for grassland management / creation.

Ecological sensitivity: low.

Fundamental ecological constraint: none apparent.

### **B.11 WGr3 Land adjacent to 52 London Road**

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: rough grassland, bare patches, bordering trees and scrub.

Protected species: There is potential for reptiles in grassland and birds in trees.

Opportunities: retain mature trees and borders. Opportunity for more planting.

Ecological sensitivity: low.

Fundamental ecological constraint: Phase 1 survey to assess habitat value.

### **B.12 WGr4 Land in front of 17 Twin Foxes**

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: grassland (cut) with trees in south-west corner.

Protected species: possibly birds in trees.

Opportunities: retain trees. Low due to size of site.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

### **B.13 WGr5 Land in front of 9 Twin Foxes**

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: grassland (cut). Two clumps of trees at both north-east and south-west ends linked by hedgerow.

Protected species: probably birds in trees, otherwise unlikely.

Opportunities: retain trees.

Ecological sensitivity: low.

Fundamental ecological constraint: none apparent.

### **B.15 OMH7 Land at 22 The Avenue**

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: none.

Other features: partly developed site with residential building and outbuildings, rough grassland, bare ground, bordering hedgerows.

Protected species: possibly birds in trees otherwise unlikely.

Opportunities: woodland / planting.

Ecological sensitivity: low.

Fundamental ecological constraint: low.

### **B.17 Dig1 Land behind 2 New Road**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: arable.  
Protected species: none.  
Opportunities: low.  
Ecological sensitivity: low.  
Fundamental ecological constraint: low.

### **B.18 Dig4 Land at Digswell Road and Bessemer Road**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: grassland with scattered trees and woody hedgerows. Western border is wooded bank of adjacent railway.  
Protected species: probably birds in trees.  
Opportunities: potential for grassland and planting.  
Ecological sensitivity: low.  
Fundamental ecological constraint: Phase 1 survey needed to assess value of habitats. Reptile survey may be necessary depending on habitat suitability.

### **B.20 BrP2 Land North East of the Great North Road**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: grassland, bordered on three sides by thick hedgerows.  
Protected species: probably birds in trees in the hedgerows.  
Opportunities: Grassland management / creation.  
Ecological sensitivity: low.  
Fundamental ecological constraint: low.

**B.21 BrP9 Friday Grove** Herts Ecology consider this location to be highly inappropriate for development. It impacts upon what could be older grassland immediately adjacent to Gobions Wood, recognised as a Local Wildlife Site and Nature Conservation Area and would be a rather isolated development intruding into what is open countryside around Gobions. Herts Ecology supports the less favourable site status.

Recognised ecology sites within Site: Part of Ecosite: Raybrook Farm Meadow (our reference: 78/067).  
Recognised sites adjacent / close to Site: County Wildlife Site: Gobions Wood Central (our reference: 79/001/01/01).  
Other features: grassland, hedgerows around and through site. Bare ground.  
Protected species: probably birds in trees.  
Opportunities: Retain hedgerows, potential for grassland creation.  
Ecological sensitivity: locally moderate.  
Fundamental ecological constraint: Phase 1 survey to assess habitat value.

**B.22 BrP10 Raybrook Farm** Herts Ecology consider this location – adjacent to BrP9 - to be highly inappropriate for development. It impacts upon what could be older grassland immediately adjacent to Gobions Wood, recognised as a Wildlife Site and

Nature Conservation Area and would be a rather isolated development intruding into what is open countryside around Gobions. Herts Ecology supports the less favourable site status.

Recognised ecology sites within Site: Part of Ecosite: Raybrook Farm Meadow (our reference: 78/067).

Recognised sites adjacent / close to Site: County Wildlife Site: Moffats Meadows (our reference: 78/065).

Other features: partly developed site, partly grassland, boundary hedgerows.

Protected species: possibly birds in trees in the hedgerows.

Opportunities: : Retain hedgerows, potential for grassland creation.

Ecological sensitivity: locally moderate.

Fundamental ecological constraint: low.

### **B.23 BrP13 Land West of Golf Club Road**

Recognised ecology sites within Site: part of Brookmans Park Golf Course Ecosite (our reference: 78/064) – [*but it might not actually be part of the golf course?*]

Recognised sites adjacent / close to Site: none.

Other features: grassland triangle bordered by woodland and a hedgerow on two sides.

Protected species: none likely apart from birds in adjacent trees.

Opportunities: potential for planting.

Ecological sensitivity: low.

Fundamental ecological constraint: none.

**B.25 Cuf4 Cuffley Hills Farm** Herts Ecology consider this location to be inappropriate for development. It impacts upon what could be older grassland immediately adjacent to The Dell Local Wildlife Site. Also Intruding into open countryside, We support the less favourable site status given the potential ecological impacts.

Recognised ecology sites within Site: Ecosite: Cuffley Hills Farm Meadow (our reference: 79/054)

Recognised sites adjacent / close to Site: adjacent to County Wildlife Site: The Dell (Cuffley) (our reference: 79/017).

Other features: grassland.

Protected species: potential for reptiles?

Opportunities: grassland management.

Ecological sensitivity: locally moderate.

Fundamental ecological constraint: survey for reptiles may be required.

**B.26 Cuf5 Land West of Northaw Road East** Being entirely arable (at least in 2010) Herts Ecology consider this area would appear to have less ecological constraints in comparison with the above site, although acknowledges the physical and visual impact may be similar.

Recognised ecology sites within Site: none.

Recognised sites adjacent / close to Site: adjacent to Ecosite: Cuffley Hills Farm Meadow (our reference: 79/054)

Other features: arable.  
Protected species: unlikely.  
Opportunities: potential for habitat creation.  
Ecological sensitivity: low.  
Fundamental ecological constraint: low.

### **B.27 Cuf7 Wells Farm**

Recognised ecology sites within Site: none.  
Recognised sites adjacent / close to Site: none.  
Other features: developed site – farm and grounds / gardens. There may be remnants of an orchard.  
Protected species: unlikely.  
Opportunities: potential to create an orchard as one was historically present.  
Ecological sensitivity: low.  
Fundamental ecological constraint: low.

### **C Sites that failed the first SHLAA test**

These have not been checked against the ecology database.

We trust these comments are of assistance,  
Regards,

Martin Hicks & Anita Parry  
Ecology Advisors, Hertfordshire Ecology