

Submission from the Panshanger People residents group to the Planning Inspector for Welwyn Hatfield's stage 3 hearing on the 19-21st February 2018

Regarding section SADM 16

Questions 105 and 107.

The NPPF paragraph 117 calls for planning policies to plan for biodiversity at a landscape-scale to identify and map components of the local ecological networks. It also says that the planning system should minimise impacts on biodiversity and provide net gains in biodiversity where possible, yet there is no biodiversity plan at a landscape-scale that looks at the cumulative impact of all the development east and north-east of WGC, nor of that to the west of WGC and Hatfield.

We think an overall survey of the ecological importance and biodiversity of all the greenbelt and major sites should have been conducted on the several sites both to the east and west of WGC area looking at the interrelationship between the various sites together with a risk assessment. This has not been undertaken as far as we are aware and a strategy to minimize the impacts on, and achieve net gains to, the biodiversity within these larger scale areas during and following the development has not been made.

The council should at an early stage, have employed ecological experts to assess the existing biodiversity and should have made sure their proposals did not destroy important habitats from the outset. This was not done and it is now very late in the day to conduct that assessment. Should any site now be found to be undeliverable because an area of high biodiversity would be lost, the local plan would be severely impacted.

The relatively rare habitat (in Hertfordshire) of undisturbed grassland, documented by local ecologists at Panshanger (WGC4) remains unrecognised by the Council. Symondshyde is another example where high biodiversity is observable whilst walking in the area, but not yet quantified by the Council. Not only should applicants now be required to use expert ecological and landscape consultants, but so should the council.

A joint Sustainability Appraisal has not been undertaken to ensure that the overall cumulative impacts of the proposals for the east and North-East of WGC (WGC5 and WGC5) have been fully assessed and considered.

In particular, the land proposed for development in Panshanger has never been cultivated, it is free from pesticides and contains unimproved grassland. We don't see any evidence if this being properly factored into the decision making that led to it being included in the proposed Local Plan for Welwyn Hatfield.