



**REPRESENTATIONS OF HERTFORDSHIRE COUNTY COUNCIL (HCC)
GROWTH & INFRASTRUCTURE UNIT**

ON BEHALF OF HCC (excluding HCC Property)

IN RELATION TO THE

**FOCUSSED CONSULTATION ON THE GREEN CORRIDOR ACROSS BIRCHALL
GARDEN SUBURB**

DECEMBER 2019

1.0 Introduction

1.1 This representation is made by Hertfordshire County Council's (HCC) Growth & Infrastructure Unit, in relation to the focussed consultation on the location of the Green Corridor across Birchall Garden Suburb to be discussed as part of the examination hearing session on the proposed allocation of land at Birchall Garden Suburb on Monday 16 December 2019. The comments within this representation reflect the interests of the following services that are provided by HCC Environmental Resource Planning:

- Landscape;
- Lead Local Flood Authority;
- Ecology;
- Historic Environment.

1.2 The Land Use Consultants (LUC) Green Corridor Study, November 2019, has been reviewed which sets out the three options for the general location of the Green Corridor across Birchall Garden Suburb and the reasoning for the council's preferred option. Comments from the above listed HCC services within the Environment & Infrastructure Department are stated in the following sections throughout this representation in bullet point format which was the requested method of responding. It should be noted that comments have only been made on the parts of the document that are of relevance to HCC.

1.3 There are a number of concerns raised in the comments below. These need to be understood in context by reading the full responses from the services, however a summary of these is as follows:

- It is unclear what the stated objectives in the document are;
- The role of the Green Corridor, role and function of the Green Infrastructure are not clear;
- The document omits reference to the Green link in the Herts Green Infrastructure Strategies;
- There is a lack of context including how the corridor relate to the wider Green Infrastructure network;
- Concern in regard to conflicts between people and sensitive habitats and whether this will be taken into account;
- There is limited analysis of hydrology in terms of both flood risk and water resources;
- Significant water resources are not shown;
- The concept of the defined corridor is unconvincing, essentially being a continuum of open land with an artificial boundary of the A414 rather than a functional, linear feature of defined, distinct character between existing sites of strategic value;
- There is a need to conserve the historic landscape and existing hedgerows;
- Concern that maps do not show known heritage assets.

2.0 Environmental Resource Planning (Landscape)

Whether you agree with the council's stated objectives for this part of the Green Corridor and, if not, why not

- The role and function of the Green Corridor is not entirely clear and would benefit from greater explanation. Furthermore, the distinction between the role and function of Green Infrastructure (GI), and the role and function of the Green Corridor should be clear. This should also consider how will it be managed.
- Indeed, it is queried if a 'corridor' is the right approach, or if the principle of a link could be expressed as more of a 'network' that permeates the development and delivers wider benefits?
- The principle of a green link, and a woodland enhancement/creation zone, running in a general north-east to south-west axis is established in the Hertfordshire Green Infrastructure Strategies (LUC March 2011). However, this is not referenced within this document.

Whether you feel that there are other, sufficiently distinct, options that the examination should consider

Which of the three options, if any, you prefer and the reasons why

- The Strategies also identify a key link running on a northwest and southeast axis between the edge of the settlement and the A414, which again is not referenced in this document. It is suggested that this potential link could be delivered within the undevelopable area.

Your concerns about the appropriateness of the other options

- Whilst the principle of establishing a green link between the two distinct development areas is fully supported in principle, there is concern that the options for achieving this should be explored as part of the masterplanning process and take account of important driving factors such as the arrangement of land uses, and the framework of streets and open spaces throughout the developments. At this stage fixing any options could risk fragmenting and impeding the workability of the masterplans.
 - There is concern for the lack of context including how the corridor relates to the wider GI network and key links from the existing settlement. It would be beneficial to understand what the key expected movement routes are between community facilities and services and honey pot destinations of the existing and new settlements and communities.
 - There is concern how conflicts between people and sensitive habitats and wildlife will be taken into account, avoided or managed appropriately.

If you are promoting an alternate option, why you feel that your option is to be preferred when assessed against the stated objectives for the Green Corridor

- It is suggested that all of the options present important aspects of landscape, visual and ecological mitigation that should as a matter of good practice be reflected within the emerging masterplans, and therefore the optimal approach is likely to be a combination of all options (as a minimum).

3.0 Environment Resource Planning (Lead Local Flood Authority)

Overall there seems to have been limited analysis of hydrology both in terms of flood risk and water resources. Significant watercourses have not been included on the plan at figure 10, nor has there been any reference to groundwater or potential for surface water flood risk. There is some surface water flood risk to the north which will require that linkages for the drainage from these areas to the watercourses can be maintained. This surface flood risk is largely coincident with the fluvial flood risk associated with the watercourses.

Understanding of the analysis would be improved if the figures in the appendices had been annotated to show desirable linkages / flows. Without this it is possible to form the view that the “considerations” are retrospective justifications of three arbitrary concepts.

It is difficult to comment on the hydrology benefits without the context of the proposed SuDS that would drain any development.

Whether you agree with the council’s stated objectives for this part of the Green Corridor and, if not, why not

- There are no explicit stated objectives which can be determined in the document. Potential benefits are described as considerations (which may be a “soft” expression of objectives).

Whether you feel that there are other, sufficiently distinct, options that the examination should consider

- It would help if there was more evidence of analysis. In the context of flood risk the outfall and channel from Black Fan lagoon (not shown on figure 10) will be safeguarded anyway as they are main river and should have an 8m buffer so it would make sense to incorporate this as part of the overall green infrastructure for the site to create a multifunctional blue/green GI. The key point then is to tie the SuDS provision in the development into this watercourse corridor.

Which of the three options, if any, you prefer and the reasons why

- Option 1 is the only option which obviously complements the watercourse on the site. It could be enhanced with elements from the other options and there is no argument put forward why there should be just one green corridor (although intuitively more green infrastructure provision would reduce the area of developable land).

Your concerns about the appropriateness of the other options

- The other options do not incorporate the watercourse which may or may not be an issue as the Environment Agency bylaws would require an 8m buffer strip anyway.

If you are promoting an alternate option, why you feel that your option is to be preferred when assessed against the stated objectives for the Green Corridor

- Option 1 tied into appropriate SuDS design for any proposed development would be acceptable. But there needs to be evidence of more analysis to demonstrate a multifunctional / multi-benefit approach.

4.0 Environmental Resource Planning (Ecology)

Whether you agree with the council's stated objectives for this part of the Green Corridor and, if not, why not?

- There are no Welwyn Hatfield Borough Council objectives stated within the LUC paper; however, the original Local Plan objectives are set out within Policy SP19 of the submitted local plan and relate to Birchall Garden Suburb as a whole.
- The concept of a defined corridor here at all is unconvincing – it is essentially a continuum of open land on the edge of Welwyn Garden City with an artificial 'boundary' of the A414, rather than a functional, linear feature of defined, distinct character between existing sites of strategic value.
- However HCC supports the intention to maintain and enhance biodiversity. Policy SP19 states '*Spaces will contribute to wider ecological networks including a strategic green infrastructure corridor from St Albans through to Hertford*'. However, if the width of this major, strategic open corridor across the county will be reduced to 100m in places, it is considered that is inconsistent with the emphasis placed on this role as a strategic corridor for biodiversity.
- Emphasis is based on human access routes, recreation, undisturbed areas and wildlife. There is an innate conflict with the latter which is unlikely to function as previously, due to adjacent development impacts and increased amenity use.
- In respect of the LUC paper, ecological elements of 1..7 – 1..11 of Green Infrastructure are supported, whilst raising the conflict of interest as outlined above.
- The descriptions of biodiversity 1..20 – 1.24 are merely statements of existing value; they do not propose any significant compensation or enhancements.

Whether you feel that there are other, sufficiently distinct, options that the examination should consider?

- Yes – a Green Corridor from the Commons LNR to Rolls and Blackthorn Wood along the edge of the existing built up area to Howellpark and Greater Captain's Wood, and then to Birchall Wood. This would provide a separation of Birchall Garden Suburb and embrace Holwell Hyde Farmhouse and Lake in a more sinuous route.

Which of the three options, if any, you prefer and the reasons why?

- Option 1 because it provides the *only* credible link which also helps to reduce the impact of adjacent development on the LNR.

Your concerns about the appropriateness of the other options?

- Option 2 provides no link to the LNR and no reduction in adjacent impact - as acknowledged.
- Option 3 provides no link to the LNR and no reduction in adjacent impact, and is a highly disturbed route adjacent to the A414. The internal ecological resources will be more isolated and as such degraded for little or no amenity, ecological or wider environmental gain. This is also acknowledged.

If you are promoting an alternate option, why you feel that your option is to be preferred when assessed against the stated objectives for the Green Corridor?

- The alternative option suggested above makes better connections with the existing ecological sites within Birchall Garden Suburb.
- The ecological conflicts of multi-use GI will not be addressed wherever development goes as wildlife which is sensitive to disturbance – wintering birds, summer breeding birds of open grasslands etc. cannot be accommodated. Furthermore, **the importance of reducing associated impacts and pressure on the LNR** – a much rarer and highly sensitive ecological habitat resource within the District and County than the ancient semi-natural woodlands generally – is paramount, as emphasised in previous consultations. This site must *not* be isolated ecologically by the proposals, which result in the LNR surrounding the site on three sides by existing and future development. Proposals should seek to ensure its appropriate management can be implemented e.g. grazing, maintain a wider ecological connectivity as well as deflect additional public pressure from this fragile wetland and grassland site. The GI approach to the ‘corridor’ is therefore critical in influencing or achieving this.
- It is stated under Option 1 that the creation of the green corridor will enable creation and restoration of habitats; given that the building blocks of habitats and open areas are already present, and the proposed built development will fragment and increase local disturbance to these and other areas, such claims are not credible. Consequently, whatever Option is chosen, it is considered to be damage limitation which may require further offsite compensation and enhancement to achieve net gains if clear gains in ecology cannot otherwise be demonstrated within the site.
- Some of these issues are reflected in the preferred option (1) statement.
- HCC supports the widest possible corridor if biodiversity is to benefit from this feature *and* be able to use it successfully as a habitat resource. Whilst widths

of corridors can vary depending on circumstances, there will naturally be a variable opportunity provided by wider or thinner features. At Birchall Garden Suburb the proposed minimal width is stated as 100m – and where the feature is most compromised between proposed development, it is considered this should be adhered to. Design of amenity resources, landscaping and management are therefore key to a functional corridor being achieved successfully.

5.0 Environmental Resource Planning (Historic Environment)

Whether you agree with the council's stated objectives for this part of the Green Corridor and, if not, why not

- The document is not wholly clear what the stated objectives are.
- Whilst HCC welcomes the objective for options 1 and 2 to conserve historic landscape character and existing hedgerows, any creation of new ones should reflect what was there before locally and not be a generic landscape.
- Any works for feature creation (such as hedgerows) should be subject to archaeological evaluation with appropriate preservation of heritage assets and/or mitigation. This should include any other works which may have an impact on the historic environment such as SuDS/drainage and path creation.
- HCC hopes that the historic landscape is conserved as much as possible across the site as a whole and not just within the proposed green corridors.

Whether you feel that there are other, sufficiently distinct, options that the examination should consider

Which of the three options, if any, you prefer and the reasons why

- Options 1 and 2 are preferred.
- The maps which show the proposed options are quite schematic and do not show the known heritage assets on them so any comments HCC makes may be revised when more detailed plans become available.

Your concerns about the appropriateness of the other options

- Option 3 includes an area of cropmarks which are likely to be heritage assets with archaeological interest, albeit within East Herts DC. The document does not refer to these. Any development or use of the ground in this area will need to have archaeological evaluation prior to its inclusion. Should this evaluation suggest that the heritage assets which are not worthy of preservation as per NPPF footnote 63, then a programme of archaeological mitigation may be required.

If you are promoting an alternate option, why you feel that your option is to be preferred when assessed against the stated objectives for the Green Corridor

- No alternate option suggested. As stated previously the document is not wholly clear what the stated objectives are.