

Response to LUC Birchall Garden Suburb draft Green Corridor document by Ian Davis

Specific response to the questions posed by Richard Javes on behalf of WHBC:

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

- The objectives set out in paragraph 1..10 are a good start but do not fully reflect the requirement within the NPPF and reiterated by the Inspector in his notes from previous hearings for “no net loss of biodiversity” unless the current biodiversity has been accurately detailed as a baseline. The document fails to do this.
- The section describing current cultural heritage is weak and incomplete.
- The section on biodiversity misses many key biodiversity assets on the site.
- The section on hydrology is an incomplete physical description of the site hydrology with no discussion of the site hydrological relevance to the surrounding and downstream areas.
- There has been no attempt to define the volume of SUDS required and the area this would take. Without this it is very hard to judge the adequacy of the buffer widths proposed. The locations of the SUDS areas will clearly be dictated by topography (SUDS cannot all be accommodated in Option 1 if development takes place South of this, down-slope).

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

- The document presents 3 limited options as stand-alone. None of them adequately address the protection of the ecological, cultural or hydrological status of the site. A fourth option could be a combination of all 3 options or complete exclusion of whole areas of the site from development (especially the Northern section of the Southern development block).
- Although the document is written from a WHBC viewpoint it also covers the EHDC part of the proposed development. The options outlined for this Northern part of the proposed development are utterly inadequate.

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

- Of the 3 options presented option 1 comes closest to achieving functional protection of the overall green corridor.
- Option 3 would need to be expanded to at least 250M width, include specific exclusion zones around the buried heritage assets and avoid any effect upon the critical sub-surface hydrology feeding the Fen within The Commons Local Nature Reserve to be truly effective as required by the NPPF.
- Option 3 would still fail to protect the hedgerow to the South unless combined with some form of Option 2.
- Any road crossing this protected corridor would severely constrain the ecological effectiveness of the corridor unless that road were tunneled under the corridor or a full width “green bridge” included.

Your concerns about the appropriateness of the other options

- Option 3 would fail to protect the essential linkages currently at play across the site.
- In any case Option 3 is largely required in order to contain the sound bund and tree screening which the site would require to be acceptable as the Inspector made clear at previous hearings.

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

- I propose a widened Option 1 combined with Option 2 and a screening belt on the line of Option 3.
- Option 1 or 2 alone do not adequately “conserve features of natural and cultural heritage importance” or “secure overall net gains to biodiversity”.
- No proposed option alone will “mitigate potential impacts on land which is currently not heavily influenced by human involvement”

General Notes and observations

Page 1 Figure 1:

- The area shaded mauve in the North section of the plan includes significant areas of land not owned by the site promoters. Without agreement from the third party landowner, linkages across this land cannot be delivered.

Para 1..5:

- Is there actually any ongoing mineral working at present? Although Tarmac intend to extract a limited quantity of aggregates from Birchall Farm prior to development I am not aware of any ongoing mineral extraction.

Para 1..7:

- The statement “*A green corridor is a linear network of green infrastructure which aids the movement of wildlife and people.*” is incomplete. Surely a functioning green corridor acts as functioning habitat in itself, not simply “aids movement”.

Para 1..21:

- I dispute that the old landfill is “managed as grassland”. It is characterised by a *lack* of management hence it’s high current ecological value.

Para 1..25:

- The western watercourse is actually called the “Hatfield Hyde Brook” and is designated Main River.
- No mention is made of the critical sub-surface hydrology supporting the Fen area within The Commons LNR.
- No mention is made of the Cole Green Tributary of the River Mimram draining most of Birchall Farm.
- No mention is made of the leachate issue and it’s impact on the quality and safety of the water environment.

Option 1:

- This is clearly the best of the options presented as it links The Commons to the old landfill site.
- There is no indication of the width or nature of the proposed green corridor without which it’s fitness for purpose cannot be considered.
- If a public right of way is included in this corridor then the width will need to be considerably greater than if not in order to avoid the human activity preventing some key species using it as a migration route.
- Any roadway crossing this corridor would render it virtually ineffective for some key species.

Option 2:

- This option leaves The Commons LNR as a “dead end” of the wider local ecology and is, therefore, unacceptable.
- This option ignores the heritage assets in the northern part of the site leaving them unprotected.
- Any roadway crossing this corridor would render it virtually ineffective for some key species.
- There is no indication of the width or nature of the proposed green corridor without which it’s fitness for purpose cannot be considered.
- In the North-East of the site this option is tightly constrained by land outside the ownership of the developers and is therefore not deliverable in an effective way.

Option 3:

- This option facilitates the buffer zone along the A414 and connects the public access network.
- This option fails to effectively connect the key ecological assets in the site, especially The Commons LNR and the arm of the Hatfield Hyde Brook.
- Any roadway crossing this corridor would render it virtually ineffective for some key species.
- There is no indication of the width or nature of the proposed green corridor without which it's fitness for purpose cannot be considered
- In the North-East of the site this option crosses land outside the ownership of the developers and is therefore not deliverable.

Figure 5:

- Some areas in this plan are subject to multiple characters which are not effectively depicted due to one colour code obscuring another.

Figure 6:

- This figure fails to recognise the valuable ecology of the old landfill site.

Figure 9:

- The "Welwyn Fringes" Landscape Character Area is so large and diverse that it does not effectively represent the detail of the proposed development site. It is a very "broad brush" spatial planning tool being inappropriately used here for a detailed purpose.

Figure 10:

- Only limited surface hydrology is represented in this plan. Significant surface waters including the Cole Green Tributary and the arm of the Hatfield Hyde Brook reaching towards Holwell Hyde Lake are omitted.
- There is no depiction of the key overland flow routes and sub-surface hydrology in this plan.
- There is no depiction of the significant leachate hydrology issues in this plan.

Ian Davis.

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