

The LUC report only considers a Green Corridor in the area of the proposed Birchall Garden Suburb. It is first worth noting that the Comments from Hertfordshire Ecology to Head of Planning at Welwyn Hatfield Borough Council, March 2015 on the 2015 Local Plan consultation state the following:

- Panshanger aerodrome is identified as a green link between WGC and Panshanger Park. As this site has now been given permission for housing and a traveller's site, this green link will be lost. This makes the BGS link all the more important.
- The east-west route conflicts with proposed housing areas and will put pressure on the LNR, not only from loss of habitat and linkages but also from people. It also notes the links to habitats in Panshanger and Hatfield Park are of key importance.
- Hierarchy and status are highlighted. The fen is a rarity for Hertfordshire and conservation and enhancement should be a priority.
- It proposes suitable buffers and maintenance of ecosystems services. We have seen no definition of 'suitable' nor proposals for the maintenance of the ecosystems services.
- The importance of WGC5 (BGS) 'appropriate management for biodiversity should be secured'.
- Quote: '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 will support any development in this location'

Consultation questions

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

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

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

I do not believe that the LUC report, as it is presented fully evaluates or understands the area of the corridor affected by BGS and the full extent of biodiversity that already exists. The report still appears to be development led rather than portraying genuine openness that would ultimately allow BGS to be compared against other sites put forward in the Local Plan within the district that would have far less impact on biodiversity, I feel this answers questions 1 and 2.

As for question 3, there is no argument that we need housing for future generations. It may seem insignificant to be arguing about one development and its direct, and indirect impacts on local biodiversity, but taken in a county or even a national scale, and given what we now know about global warming, this green corridor becomes very significant indeed in sustaining local biodiversity.

My preferred choice for the 3 options would be none of them for the reasons above.

But; If a substantial corridor can be established, ensure it is wide enough to provide significant habitat enhancements to compliment what already exists to not only fulfil its present function for species movement but to ensure increased biodiversity, along with facilitating more access for people to 'adventure' into the countryside, then option 1 is my preferred choice, but the comments below need to be considered and addressed.

- The draft LUC report does not constitute a document that fully considers the current value of the existing green corridor that extends from Symondshyde to Hertford.
- The LUC report is being rushed through to comply with the inspector's wishes and needs to be sent out for wider consultation and to consider the following corrections which are shown further down.
- The document only considers the general habitats that make up Birchall Garden Suburb (BGS) and makes the assumption that the width of the corridor should be an arbitrary 100 metres wide.
- Without the data provided by a strategic ecological impact assessment, including the corridor outside of the BGS boundaries, this figure is just guesswork.
- The report does not indicate implementing required buffers around existing ecological assets although it does say that the important areas for biodiversity should be connected to the corridor.
- Without adequate width for continued wildlife movement, including land mammals and declining farmland birds, that are recorded in very high numbers through specific management and recording over the past 2 decades, the proposed housing of BGS will not only impact directly in this part of the corridor, but the indirect impacts would be felt on other key sites in the corridor.
- The most up to date assessment of species commissioned by Hertingfordbury Parish Council (ELMAW 2018) highlighted the species richness of the area affected by BGS that reports over 150 species of red listed, species of principle importance and European Protected Species between Panshanger Park and Commons Wood. This is because of the diversity of ancient habitats and the naturally re-wilded former landfill site of Cole Green.
- The report fails to full acknowledge the most important area of habitat that will be affected by BGS housing, Blackfan Fen.

Without a full hydrology study, the damaging impacts from development on the fragile habitat of Black Fan Fen (rare schedule 41 habitat in Hertfordshire) which is fed by groundwater seepage has not considered. Springs that feed the fen percolate between the clay and surface of the chalk from the higher land directly east, i.e. the fen is not aquifer fed. Local springs also feed the Birchall Farm double moat and the now filled-in moat in Moat Wood, as well as the various watercourses on the east Herts part of BGS.

Gravel extraction of this area AFS12, was considered in the Hertfordshire County Councils Minerals Local Plan Review plan for Herts in 2002 and was not considered suitable by the Environment Agency on the ground of the impact on local hydrology.

- A key point missed by the report, by not fully considering the Commons LNR fen area in detail and the contribution that it makes to carbon storage. The 2.9 area of wet fen could sequester around 8 tons of CO2 annually.
- Given that the growing peat can be dated back 1500 years (Wessex Archaeology report), at present around 12,800 tons of CO2 is stored in the wet layers, a significant positive in the fight against global warming.
- Equally, if ground water is cut off by development, around 24 tons of CO2 storage will be released back into the atmosphere annually.

The lack of consideration to hydrology applies to the East Herts section of BGS and must consider the impacts on, The Holwell Park Spring System that will be affected by the East Herts development area of Birchall Garden Suburb to the west of the former Cole Green landfill area. It should be noted that this spring system also supports the population of water voles that are in the series of ditches that run through the arable land included within the East Herts area adjacent to Holwell Park Wood

- The green corridor proposed does not offer any positive net gain for biodiversity as it is presented; it will in fact have a major negative impact on biodiversity, causing net loss. To facilitate wildlife movement, access and for it to continue to function as a contribution to ecosystem services, a figure of 350 metres minimum width needs to be applied at its narrowest points.
- I fully endorse the statements and proposals made by the Central Hertfordshire Green Corridor Groups in their response to the LUC green corridor document.

Specific comments in the report detail

Introduction

- **1.5** (*continues to be worked for mineral extraction.*) It is mineral processing and not extraction at both sites
- **Figure 2.** The Commons LNR is shown as solid woodland and is a key ecological asset for the corridor and it comprises of the following and these must be shown correctly:

Blackfan Fen, is 2.9 hectares of wet fen and 2.1ha is woodland

Windmill Hill, 2.2 hectares is in arable stewardship, not permanent grassland

Howlands Meadow, 50% is grassland

- **1.7** The suggested 100 metres is a minimum width of the corridor proposed, on what basis, there has not been a full ecological study of the entire corridor. Each wildlife site must have its own buffering habitats that consider the full value of the adjoining habitat and species it supports. These must link to the corridor to form a unit of sufficient width to support the species, access and a significant contribution to ecosystem services.

- The original green corridor document produced by Welwyn Hatfield Borough Council and sent out for wider consultation shows a corridor with a width of 250 metres over the Commons LNR and extending east. This must be the minimum width of the corridor as this is what was originally consulted on.

Cultural Heritage

- 1.16 The Wessex Archaeology Report considered the burnt mound along in context of Neolithic/ Bronze Age flint tools in the adjacent arable land¹. This should be made clear in the report.

Biodiversity

- 1.21 The landfill site is not managed; gypsy ponies graze the south east area. The remaining area is left and dumping of waste is unrestricted. There is no management plan. It is high in biodiversity due to natural re-wilding. This is valuable in that species have colonised it due to suitability of habitats, rather than being imposed re-introductions which can fail.

1.22 Suggested wording in bold type

The Commons Local Nature Reserve is located to the north of the BGS site. The nature reserve **has been managed under a countryside stewardship scheme since 1998 with significant emphasis on annual sown arable area as wild bird cover crops since then with restoration of habitats, including ancient boundary hedgerows.** It contains a mosaic of habitats including, **coppiced and standing** broadleaved woodland, with longstanding oak, ash **and ancient pollarded hornbeam.** It is designated for grassland indicators, fen and swamp. Many of the trees are indicators of historic land-use from Hatfield Great Wood and Holwell Hyde assart.

1.25 Correction to description in bold type

The BGS site contains a network of waterbodies including ditches and ponds. A ditch flows south-westwards from the Holwell Hyde angling lake which connects to the **Hatfield Hyde** Brook which flows **along the southern boundary of the Commons LNR and eastern boundary of Commonswood.** The **Hatfield Hyde** Brook is tributary of the River Lea, which is located south of the A414 Hertford Road. The southern section of the site contains a section of ditch and three small ponds.

Option 1: The Commons Local Nature Reserve to Birchall Wood

Description

The main green corridor extends from The Commons Local Nature Reserve on the western boundary linking to Greater Captain's and Holwell Park Woods before stretching northwards to encompass Birchall Farm and connecting with Birchall Wood. This main route broadly follows the green corridor shown in the Local Plan strategic diagram. A subsidiary route follows an existing watercourse connecting The Commons Woods with Holwell Hyde Farm Lake.

¹ Wessex Archaeology *Black Fan Fen, Welwyn Garden City* 2012

- It does not protect the setting of Holwell Hyde Farm, a valuable heritage asset; housing is proposed on the arable land directly abutting the site.
- The setting of Blackfan fen, a rare habitat for Hertfordshire, one of only 4 fens in Hertfordshire has not been considered. The hydrology that has promoted peat growth for 1500 years and continues to do so, is fed from ground water seepage of water from the sloping arable land directly adjoining the fen to the east. This is a fragile habitat which could be lost due to disturbance to the water supply or increased pressure from public access.

The green corridor is located some distance from the Burnside waste and recycling facility and the A414 providing an attractive route for informal recreation activities (including walking, dog walking and cycling) and reducing disturbance to wildlife.

- **The green corridor extending from the Commons LNR (100m) is not sufficient for wildlife dispersal, let alone enough to achieve recreational access. Provision for recreation must be considered in a realistic width of no less than 350 metres.**

The existing chain of ponds and ditches will be enhanced to create a network of sustainable drainage which will attenuate water before reaching the Brook. These features will also provide the opportunity to create wetland habitats.

- **To achieve this there must be creation of suitable grassland habitat adjacent to the Holwell Hyde Farm House and beyond which must be protected from development and recreation. Wetland habitat could also be affected by toxic leachate into the ponds.**
- **The existing green corridor functions for wildlife movement, it contributes to ecosystem services and access for people. The report has not fully considered that the landfill grassland, a naturally re-wilded area is biologically very rich in species and is an important part to the existing corridor. Recreation in this area will cause significant negative impact. Add the proposed housing to arable areas and the impact on farmland species, there will be significant loss of biodiversity.**

Option 1

- **This would be the preferred option on the basis that it would potentially facilitate wildlife movement from the ecologically diverse Commons Local Nature Reserve to open countryside but is totally inappropriate at the suggested 100 metre width.**
- **It is not sufficient to maintain present biodiversity levels and movement.**
- **If the principle that wildlife corridors must not be crossed by roads and this is applied not only to the main corridor, but also the subsidiary link that runs from Hatfield Hyde Brook to**

the fishing pit, this suggests the area of arable between the two routes would be part of the complete corridor.

Option 2

- This is not suitable as a stand-alone corridor. It fails to connect to the most diverse habitat of the Commons LNR which is the functional route in the present corridor. Species that do not use woodland for dispersal would be isolated within the Commons LNR surrounded by housing

Option 3

- This is also not suitable as a stand-alone corridor. It fails to connect to the most diverse area at the Commons LNR. Species that do not use woodland for dispersal would be isolated within the Commons LNR as described in option 2.
- Attracting wildlife in the vicinity and directly adjacent to a major trunk road, the A414 is not acceptable.

Preferred option 1 comments

1.27, 1.29, 1.31, 1.32

- The hydrology of the area must be fully considered, including the current flooding of Hatfield Hyde Brook
- Commons LNR. A thorough understanding of ground water seepage feeding springs in Black Fan Fen to protect the growing peat layer and its significant contribution to storing CO2 emissions
- Commons LNR. Ground water feeding springs on Windmill Hill
- The buffer around Blackfan Fen must include the adjacent farmland that falls westward to protect existing springs
- Fails to consider the springs feeding wetlands in Holwell Park Wood in East Herts section

Appendix

- Why is the BGS boundary (black line) shown as going round proposed housing instead of the whole BGS site including East Herts? All figures are too broad brush to show important detail which would make the figures of some use. None of the figures shows onward Green Corridor outside of the narrow boundaries. Therefore it is not possible from these figures to estimate long-term viability of the corridor.

Figure 2

- Does not show the full extent of open space near (Hall Grove). Also fails to show features adjacent to BGS which affect viability of the Green Corridor.

Figure 3

- Does not show any hedgerows on the Welwyn Hatfield side of BGS, there are many in this area with ancient pollards and ditches. These need to be included as they show a substantive nucleus of ancient habitats

Figure 6

- River/Canal. Hatfield Hyde Brook is not shown extending along the south of the Commons LNR and extending to Howlands

Figure 7

Commons LNR

- The upper area of Windmill Hill, Commons LNR is left white, confusion with white of development area. This area is in Countryside Stewardship arable and needs to be allocated a category and colour.

Commons LNR

- Howlands Meadow area shown in mauve (scrub) incorrect, it is successional woodland with coppiced areas
- Commons LNR Blackfan Fen should be shown a colour for fen, not Marsh/Grassland

Figure 8

- Commons LNR, Windmill Hill, the lower section is shown as restored grassland, it is permanent grassland with planted hedgerows (restored)

Upper area is shown for creation of habitat. It is in fact in countryside stewardship, arable management for farmland birds and has been since 1998 and already significantly contributes to the survival of local farmland bird populations