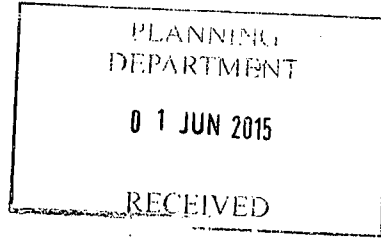


RAR (MP)

From: Martin Hicks [Martin.Hicks@hertfordshire.gov.uk]
Sent: 29 May 2015 19:35
To: Planning
Subject: Blue Moon paddock S6/2015/0524/FP
Attachments: Blue Moon Paddock Brookmans Park.doc



FAO Mr M Peacock

Please find attached my comments on the application for this site.

Regards,

Martin Hicks MCIEEM
Ecology Advisor
Hertfordshire Ecology
Environmental Resource Planning
Postal Point CHN109
Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DN

Tel: 01992 556158 Comnet / Internal: 26158
Email: martin.hicks@hertfordshire.gov.uk

Please note that the LRC component of HBRC has transferred to the Herts & Middlesex Wildlife Trust. We will be removing biorec.info@hertscc.gov.uk in due course.
The advisory service is still hosted by HCC and is now known as Hertfordshire Ecology. Our email address has changed to ecology@hertfordshire.gov.uk

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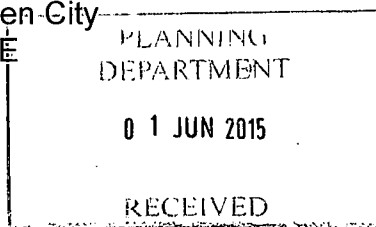
Environmental Resource Planning
Hertfordshire County Council, County Hall, Hertford, SG13 8DN
ecology@hertfordshire.gov.uk
Tel: 01992 555220

Mr M Peacock
Development Management Officer
Welwyn & Hatfield Borough Council
The Campus
Welwyn Garden City
Herts AL8 6AE

Your Ref: S6/2015/0524/FP

Ask for: M J Hicks
Tel: 01992 556158
email: martin.hicks@hertfordshire.gov.uk

Date: 28/05/15



Dear Sir

Erection of dwelling house, creation of a Centenary Wood and Poppy field and hardstanding following the demolition of redundant structures Blue Moon Paddock, Woodfield Lane, Brookmans Park

Thank you for consulting me on the above application for which I have the following comments:

1. The application site falls wholly within Cheshunt Farm Meadows Local Wildlife Site (Ref: 70/080). This has been identified on the basis of its grassland interest, which was (at the time of selection) regarded as species-rich acid / neutral grassland.
2. The residential development itself is located within the immediate area of the former stables. Having been already disturbed and affected by this use, the habitat here would be significantly degraded and so I consider would not, in itself, represent a fundamental constraint on the development. However, no details of garden, garaging etc... are provided, which would have a greater impact.
3. The Phase 1 survey and aerial photos suggest the current condition and quality of this part of the Local Wildlife Site is relatively poor in respect of grassland interest. Proposals for additional tree planting as part of a Woodland Trust national scheme and a Poppy Field as part of a British Legion national scheme would damage any open grassland interest by modifying its natural interest in what would be regarded as unacceptable ways. Trees will influence the character and quality of the grassland whilst poppies are a species of

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disturbed ground, hence their association with arable fields. They are not found in permanent grassland.

4. However it is clear from the Phase 1 mapping – if reliable – that the site may have degraded considerably and now is unlikely to support open grassland interest sufficient to meet Local Wildlife Site status. Indeed, in 1988 it was described as a *weedy horse pasture* and in 1996 as a *weedy horse paddock with buttercups and docks*. These descriptions would indicate that the grassland had certainly been under poor management for some time, which is often typically associated with poor quality. It certainly contrasts with the descriptions of the quality of the field compartments to the north. Its original inclusion within the Local Wildlife Site may not have been justified and this needs to be reviewed by the Local Wildlife Sites Partnership. However this **would need to be confirmed with an updated survey during the principle field season** (typically June to August for grasslands).

5. The results and photos in the Phase 1 survey indicate species-poor grassland, heavy disturbance, bonfire damage and ruderal / scrub encroachment and well established woodland on the southern edge. This wooded area would have been incorporated within the Local Wildlife Site on the basis of land management / land parcels. The ecological report did not identify the application site as a Local Wildlife Site despite the ecological search, and consequently did not address this issue.

6. The grassland of the former horse paddock has been subject to continued inappropriate (no) management in recent years. Whilst any former interest may be recoverable with appropriate management, this is unlikely to occur if the site was already poor or subject to other damaging plans for the site.

7. No protected species interest was identified associated with buildings on the site. Mature trees or other features of potential bat interest are unlikely to be affected by the built development proposals.

8. I am unclear as to why the proposal includes tree planting and creation of a poppy field as I do not believe these operations require planning permission, although I acknowledge the intended related benefits. The proposals for an orchard and bees are positive if the location of the orchard does not negatively impact on high quality grassland. However any such benefits could be provided without the need for a dwelling on the site, although I acknowledge this would make management easier depending on how much land management work was proposed that needed on-site accommodation.

9. The wooded area referred to is the remnant of the former George Wood which was essentially clear-felled sometime after the 1930s to create Chestnut Farm and the open meadows, which now make up the whole of the Local Wildlife Site area. It is shown as cleared ancient woodland in the Ancient Woodland Inventory. This probably explains the scattered trees found in the fields to the north and east of the application site.

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10. Managing the site as a smallholding will alter its current characteristics and semi-natural character. However this was originally almost certainly ancient woodland, and leaving it unmanaged will gradually restore a woodland to this site - although this will also destroy the grassland vestiges or potential. The need for any buildings on this site to achieve any of this must be considered, however environmentally beneficial they are.

11. The management options seem to be thus:

- No management will eventually restore high forest woodland to the site. This does not require buildings. Subsequent management may require access tracks but is not predicated on residential accommodation.
- Grassland management requires hay cutting and or grazing. In itself this does not require residential development, although if the means to do these activities are to be provided by the owner, some facilities will be required. Cutting and grazing could be undertaken by other farmers, if available, and could help to restore some grassland interest to the site.
- Planting and managing an orchard does not require residential development, although some associated facilities may be beneficial.
- Running the site more intensively as a smallholding would benefit more from a regular presence and facilities for tool / machinery storage. The need to live on site is still questionable as this is not a requirement for every farmed field or smallholding. However day-to-day activities would benefit from some facilities being present if the owner is not local.

Depending on how the smallholding was managed, this could considerably change the character of the site but could potentially benefit the local ecology with appropriate management aims and implementation. However, if Local Wildlife Site status on the basis of grassland is still justified, management should be in support of maintaining this interest if linked to any planning gain. If the development was not in support of these aims, any Local Wildlife Site interest would be further degraded. As such, this should be avoided.

12. To summarise:

- I consider that the development in itself would have a limited detrimental impact on the ecology of the site given it would be located in the area of the existing stables. However the associated land uses and proposed plans could be damaging to any genuine grassland interest that remained.
- I am not convinced that the application site part of the larger Local Wildlife Site still merits this status. It is possible that it should not have

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been included originally. This should be re-assessed by the Local Wildlife Sites Partnership.

- More appropriate and detailed plans for site management could demonstrate ecological benefits the sites ecology or restore any remnant interest if this still exists. However the current information is insufficient to enable proper consideration of this.
- In any event, the need for residential development associated with any site management has not been sufficiently demonstrated. On this basis I consider that **the planning gain link to the development does not justify approval, although it is unlikely that in itself ecology would represent a reason for refusal** for the reasons I have outlined above. However if it could be shown that residential development was necessary to significantly benefit the site's ecology, the proposals could be reconsidered.

13. I do not consider there to be any additional ecological issues associated with these proposals.

I trust these comments are of assistance,

Regards,

Martin Hicks MCIEEM
Ecology Advisor, Hertfordshire Ecology

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