

Application Reference: 6/2016/1677/MAJ

Proposed development at: Blue Moon Paddock, Woodfield Lane, Brookmans Park

Proposal: Demolition of existing redundant structures and erection of single family dwelling house, together with associated tree planting scheme (part of Centenary Woods project sponsored by Woodland Trust); landscaping and car parking

Thank you for consulting Hertfordshire Ecology on the above, for which I have the following comments:

1. The application itself differs in providing an upgraded building, and is supported by a reptile survey and additional comments in response to previous views provided by Herts Ecology.

2. My previous views remain largely the same and can be outlined as follows:

- No reference to the existing Wildlife Site status has been made and no updated / improved survey to demonstrate clear degradation of the quality of the grassland element present – as a minimum I would normally expect abundances to be included within a species list to clarify the nature of a site if the existing status is considered no longer appropriate. It remains part of a Wildlife Site for grassland and this should be adequately addressed;
- The proposed tree planting will not create a ‘woodland’ as many of the existing trees across the bulk of the site remain scattered over open ground - the new tree planting will be primarily around the edges. Whilst this would result in more of a wood pasture character, no management is proposed to manage the grassland or the trees; the proposed habitat cannot be said to resemble a restored ancient woodland in any meaningful sense;
- Poppies remain wholly inappropriate for permanent grassland or woodland habitats. They are a species of open disturbed ground;
- Habitat management options have not been clarified;
- The need for a dwelling to enable the broad site management benefits to be achieved has not been adequately justified in my opinion. Both woodland and grassland does not need a dwelling on site to enable appropriate management. Whilst I have no professional expertise in this area, the LPA needs to be satisfied that this link is real if the need for the dwelling is to be justified in this respect, or that the associated environmental benefits are considerable.

3. The reptile survey has identified slow worms and other amphibian species on the site; the mitigation proposals are acceptable, assuming the remainder of the site does not have a full carrying capacity of slow worms, although the low numbers present does not suggest this is likely. Consequently **this aspect of the ecology has been satisfactorily dealt with.**

4. Despite my views outlined in 2. above, I remain of the opinion that the grassland interest of the site is unlikely to be of a high quality given what evidence and previous descriptions are available. The quality and extent of the grassland present are now thoroughly degraded. **I do not have any sound reason to object to the proposals** on the basis of the impact on the existing ecology as described. I acknowledge the positive features of the site which are to be created, although the character of the site will change in places given the permanent

dwelling, associated features and access road. In places it will resemble more of a smalholding. In my view I see no evidence that the site will be restored to woodland as claimed, although it will be an improvement on the existing position which is redundant, delapidated and previously part of a horse paddock now dominated in places by ruderal vegetation.

5. Whilst there is no ecological objection to the proposed development, the associated benefits may have a variable impact depending on **longer term management aims - which have still not been adequately described**. I can find no reference to a detailed landscape proposal as outlined within the D&A Statement, although there are tree planting plans. However, in any event these management operations do not require planning permission. I also remain unconvinced that the development is required to achieve the proper physical management of the existing site for the reasons previously expressed – although some aspects of site management may be more readily implemented.

6. Consequently, if the justification for the development is to be partly based upon ecological and landscape benefits that will accrue from management, **I consider that any permission must be accompanied by:**

- a **Condition** that requires a suitable **management plan** to be written that clearly describes:
 - i). the rationale for and nature of the ecological benefits claimed,
 - ii). the details of the works required to create this,
 - iii). the subsequent management required to deliver and maintain these, to the satisfaction of the LPA;
- A **S106 Agreement** to ensure the plan will be delivered.

Without these, I am unconvinced that any ecological benefits resulting from this proposal will be appropriate, or any management required to maintain them will be delivered.

I trust these comments are of assistance,

Regards,

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