

HERTFORDSHIRE ECOLOGY

Providing ecological advice to Hertfordshire's Local Authorities and communities

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Ask for: Simon Richards
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Date: 24/05/2023

Dear Elizabeth

Reference: 6/2022/1943/FULL

Address: Land between 48 & 50 The Ridgeway Cuffley EN6 4BA

Application: Erection of a new dwelling with associated landscaping works

Thank you for consulting Hertfordshire Ecology on the application for which I have the following comments

Summary of advice:

- The site should be considered an area of ancient woodland and the development will result in the loss or deterioration of an irreplaceable habitats and should be refused.
- The site is part of a Local Wildlife Site, and the development would deplete its value as a site of local biodiversity value.
- The proposed use as a forest garden will not bring biodiversity improvements to the site but result in biodiversity loss.
- The proposed mitigation and enhancements are not suitable and or not sufficient to mitigate the damage to the site.
- The assessment of the trees according to arboricultural categories should not add weight to the proposal in the context of this seminatural woodland.
- Sufficient information has been provided on European protected species (bats) to allow determination.

Supporting documents:

The application is supported by the following report:

- Ecological Appraisal by Wychwood Environmental Ltd (report date April 2022)
- Botanical Survey and Biodiversity Enhancements and Ecological Mitigation Plan by Wychwood Environmental Ltd (report date July 2022)
- Tree Climb & Potential Roost Assessment (PRA) by Wychwood Environmental Ltd (report date April 2022)

- Bat Emergence Survey by Wychwood Environmental Ltd (report date June 2022)

Comments

The site is composed of semi natural woodland which is contiguous with Homewood a large block of woodland. A site visit was carried out on the 11/5/2023 by Hertfordshire Ecology to clarify our understanding of the ecology of the site and allow us to provide informed advice relating to its ecological value. This included an assessment as to whether the woodland could be considered ancient.

Ancient Woodland

The types of Ancient semi-natural woodland includes Oak-Hornbeam (for which Hertfordshire has a significant proportion of the national) being the most typical of the south and east of the county including the nearby Greatwood SSSI. The site visit confirmed the woodland to be consistent with this woodland and having a typical understory of bracken, holly and grasses with a number of additional species associated with reduced drainage. Both the application site and the greater area of woodland to which it is connected are shown on historic maps of Hertfordshire such as Bryant 1822 and the 1866 Six inch O/S map and continue to be shown on later historic maps. Other historic features within the woodland included the presence of a ditch and bank on the boundary which is similar to a feature providing a boundary to Homewood along the length of Carbone Hill. The woodland also contains hornbeam coppice stools of considerable age (acknowledged in the Ecological assessment by Wychwood to be approximately 50-100 years old) demonstrating that the site has been continuously wooded in the intervening years. The flora includes a number of ancient woodland indicator species including pendulous sedge, wood sedge, wood meadow grass, fox glove and holly. All these features are consistent with the woodland being ancient in character. Given this and the map evidence I advise that the woodland should be considered as Ancient Woodland.

Ancient Woodlands are a rare resource making up only 2.4% of the land cover nationally and only 4% within Hertfordshire. The complex ecology of ancient woodlands has developed over a long period of time and it is not possible to recreate this habitat artificially by new woodland planting. Because of this they are classified within the NPPF and within Natural England's standing Advice as irreplaceable habitats.

The NPPF states that: "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists".

Natural England's Standing Advice on Ancient Woodlands lists the soils of ancient woodlands as one of their important features. These soils, like Ancient Woodlands themselves, take hundreds of years to establish, are relatively undisturbed and support a complex soil ecology and residual seed bank that cannot be found in the soils of recently planted woodland.

Whilst relatively few trees are being removed the proposal will result in the direct loss of over quarter of the ground space with its associated ground and

soil flora, fauna and fungi beneath buildings and hard standing. There will also be a loss of an additional approximately quarter of the woodland floor to some form of gardening or landscaping.

The proposal would change the character of the site from an area of woodland to an area of residential use. This change would subject the retained areas of the woodland to all the direct and indirect impacts associated with this use. These activities, which would be a reasonable expectation of any homeowner and outside of planning control, such as the use of the space for gardening and landscaping, recreation and household entertainment, would create additional pressures, disturbance and changes to the existing seminatural woodland and have a negatively impact on its biodiversity.

The Ecological Appraisal supporting the application assessed the site as being of moderate ecological value. However, this does not account for the age of the woodland which is likely to contribute to the presence of a significant biodiversity in terms of microbial, fungal, and invertebrate populations. It is also notable that the desk study for the Preliminary Ecological Appraisal does not seem to have included a request for records from the Hertfordshire Environmental Records Centre. Whilst the only survey information I am aware of specific to the site is that accompanying the application, there is considerable survey information associated with the publicly assessable parts of Homewood. This does not appear to have been considered in the ecological assessment.

Consequently, I advise that the proposal will damage and result in the loss of an Ancient Woodland and should be refused.

Local Wildlife Site:

Homewood including the area of this site is a Local Wildlife Site. This was not recognised by the Ecological Assessment although the woodland was noted as being a Biodiversity Action Plan Priority Habitat.

Government guidance (Guidance Natural Environment updated 21 July 2019) states that Local Wildlife Site are areas of “substantive nature conservation value and make an important contribution to ecological networks and nature’s recovery”. There is an expectation that local policies should “secure their protection from harm or loss” and “help to enhance them and their connection to wider ecological networks”. The NPPF 179 also states that plans should “safeguard components of local wildlife-rich habitats.... Including... locally designated sites of importance for biodiversity”

This proposal will result in the damage to and loss of an area of this Local wildlife site. I advise that this site should be protected from harm and maintained as an area of seminatural woodland and that its use for residential development is incompatible with its long term conservation.

Trees

The area proposed for development is an area of seminatural woodland with 43 trees listed with in the arboriculturally report. The majority of these are native species with only a small number of non-natives in the form of 5 sycamores and one-horse chestnut. Of the native trees only four are Ash and so possibly affected by Ash die back. The report lists all the trees as being semi mature or

older with 13 listed as being mature and two as being overmature. In terms of the age, health and condition of the trees, it is important to understand the findings of the report in the context of the trees being part of a seminatural (ancient) woodland and part of a LWS. In this context a mixture of trees of differing ages and states of health including those with dead wood and broken branches is normal and ecologically beneficial, creating a range of diverse ecological opportunities and habitats for species. In general, the older the tree the more valuable it is likely to be ecologically. In this context the trees listed as being Over Mature are likely to be of higher ecological value. The classification of the trees according to different arboricultural categories and descriptions of their life expectancy and notes on the presence or absence of dead wood and broken limbs may have relevance if the site is to be developed but should not be considered as providing any weight in favour of the principle of development within this area of seminatural native woodland.

The development will directly result in the loss of two semi mature trees T62 hornbeam, T46 hornbeam. However, the impact of the development should be considered according to its impact on all of the elements of the woodland including its soils and ground cover.

Biodiversity enhancements and mitigation.

The application makes claims that various measures and components of the proposal will increase the biodiversity of the site.

Forest gardens. The proposals include the creation of forest gardens. This is a system of food production that mimics the structural elements of a forest to maximise food production due to the ability to grow edible crops at multiple layers and typically includes food producing trees underplanted with various layers of edible shrubs climbers and vegetables. This can include a range of non- native species. Whilst the use of native pollinating species are recommended in the Biodiversity Enhancements And Ecological Mitigation Plant this is in addition to this planting of food crops.

In the context of the existing site the applicant claims that managing part of the site as a forest garden will improve its biodiversity and that of the of adjoining Homewood. In support of this it quotes from series of questions asked to a Graham Bell a leading advocate of the forest gardening as well as quoting passages from the “State of the UK’s Woods and Trees 2021” report by the Woodland Trust.

I do not dispute that in the right location forest gardens represent a method of food production that has benefits to ecology and biodiversity particularly in comparison to other garden or food growing systems. However, in relation to this site the proposal confuses the ecologically benefits of forest gardening as a means of food production with the idea of increasing the biodiversity of historic areas of a semi natural woodland. The biodiversity of the latter is best increased by restorative practices that mimic the traditional woodland processes such as coppicing and pollarding and which were responsible to maintaining their original high biodiversity value. The ecological benefits of forest gardening are best realised by its application on areas of land that are already developed or intensively managed and not by the removal of semi natural habitats that

already are or could be restored to a high ecological value such as areas of Ancient Woodland or priority habitat.

In quoting Graham Bell's appraisal of the proposal, the DAS makes some specific points in relation to ecology. This includes an explanation as to how Hornbeam woodlands would have traditionally been coppiced and how the removal of trees was in fact beneficial to the woodland's biodiversity. The existing woodland does contain old coppice, but the benefit referred to results from the light gap created by coppicing that allows the regeneration of the woodland from the naturally occurring seed bank including an initial flush of diverse ground flora. In this case any light gaps created by the proposal will be lost either to the development of the building and hardstanding or to garden planting with the subsequent loss of the natural seed bank and disturbance of the woodland soil.

The DAS also claims the development will help link up the site with adjacent wildlife corridors, both woodland pasture and riparian for the benefit of wildlife in the locality generally. The existing site is already contiguous with rest of Homewood and is not directly adjacent to any areas of woodland pasture or riparian habitats there is no planting proposed that will or possibly could connect it to any of these features.

The DAS also reference as evidence sections of the woodland trust report that relate to urban forests and agroforestry these are quoted out of context and cannot be applied to the woodland within the application site. Urban forest is an overarching term for all urban trees including street trees, and areas of woodland within urban green spaces. The woodland within the application site is not part of the urban forest but part of an area of historical (ancient) semi natural woodland set between Cuffley village and other surrounding woodlands and countryside. The references within the woodland trust report to agroforestry relate specifically to trees outside of woodlands and again are out of context and not relevant to the existing proposal.

Overall management of the existing woodland as a forest garden will not enhance its biodiversity in a meaningful ecological manner but in fact result in the loss of the existing naturally occurring woodland biodiversity of the ground, shrub and soil fauna and flora.

Woodland improvement: A number of recommendations for ecological enhancements have been made including the thinning and reduction of the old coppice stools to prevent them splitting, the removal of sycamore from the wood and replacement of the cherry laurel with a mixed species native hedge. Considered on their own these interventions would be of benefit, although no future management has been proposed to secure this benefit in the long run. However, in the context of the development this is not sufficient to mitigate or compensate for the loss and damage caused by the proposal to this ancient woodland, priority habitat and section of a LWS.

Proposed planting: The suggested planting list to enhance the site for bats, includes many garden plant species inappropriate in the context of a semi natural woodland being either not shade tolerant or non-native. The Shading

impact of the retained trees will also have an impact on the proposed green roof particularly as this is to be sown with non-shade tolerant meadow species.

Sustainability: The application also makes various claims regarding its value in terms of sustainability. Whilst there can be a link between improved sustainability and better biodiversity this is not a given. In this situation these features are part of a building development which will result in the loss of an area of woodland and its biodiversity. Specific features such as the air source heat pump are also likely to increase the noise disturbance of this semi natural space whilst the positioning of photovoltaics on poles within the tree canopy will have a shading effect on the natural vegetation in proportion to the size of the solar panel.

The proposal also lists the monitoring and management of rhododendron encroachment as a benefit of the proposal. When visiting the site Hertfordshire Ecology did not identify this as a large scale problem within the site and this could be easily managed through standard woodland management practices and does not require the development of the site as a residential area in order to facilitate it.

Protected Species

A Climbing survey of the trees identified two, Tree 37 (oak) and 70 (ash), with the potential to contain a bat roosts. One was Tree 37 was assessed as being affected by the proposals a two emergence surveys were carried out on tree 70 no behaviour suggesting the presence of a roost was reported from these surveys. I have no reason to doubt this assessment.

Yours sincerely

Simon Richards
Ecology Advisor, Hertfordshire Ecology