

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: 06/01/2020

Dear David

Application Engineering works comprising ground works and shaping of land to create a golf course (used only in conjunction with the Nyn Park Estate dwellinghouse) and erection of an associated single storey maintenance building

Address: Nyn Park, Well Road, Northaw, Potters Bar, EN6 4BS

Reference:6/2020/0311/MAJ

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

In my previous response I questioned how much of the measures outlined in the Ecological Management Plan by Maydencroft 2020-2030 related to the obligation attached to the previous planning consent and outlined in the 2008 Nyn Park Landscape Specification. This did not propose a golf course, which it is clear has already been constructed without the benefit of any planning consent at the expense of potentially ecologically valuable neutral grassland. This is clearly an artificial recreation facility – albeit not commercial - and managed as such, with peripheral ecological benefits only. It cannot truly be considered as restoration to parkland - as the original proposals would have achieved, as such areas are not wood pasture.

The similarity of some of the recommended management proposals within the new plan to those relating to these previous obligations is recognised in the explanatory document and I acknowledge this. Whilst the benefits of opening up the former parkland generally from overstood areas of woodland are also recognised, creating a golf course was a departure from the previous planning obligation. To consider its impact, I previously advised a biodiversity metric should be provided to demonstrate delivery of net biodiversity gains given the departure from the previously agreed landscape plan.

It is argued that in response to the initial plan, resources have been applied and improvements to the onsite habitats have been made and that the new

management plan therefore represents a continuation of this work. Whilst I accept this, I note that for metric purposes, most of the existing grasslands are considered to be in poor condition as well as a third of existing woodlands. Given most of the conifer plantations were felled in 2009 and the open parkland restored in 2010, the success of grassland restoration over ten years clearly leaves much to be desired, although this is at odds with the description of the North Parkland as species-rich grassland, with at least 7 indicator species used for LWS recognition.

A NE Biodiversity Metric V2 has now been submitted along with an explanatory document. This covers the whole application site - both the new golf course and surrounding area of Nyn Park. Its calculations demonstrate a post-intervention value of 1269.36 habitat units with a net gain of 15.26%, plus 8.92 hedgerow units a net gain of 21.4%. The majority of this uplift is achieved by improvements to existing habitats through management with habitat creation accounting for only 6% and 0.5% of the net gain for habitats and hedgerows accordingly. The overall results are above the 10% minimum net gain that is outlined in the January 2020 Environment Bill.

However, of this figure some 47 biodiversity units relate to improvements to Well Wood SSSI. One of the best practice principles of achieving net gain outlined by CIEEM is that it should achieve outcomes that do not include or exceed those resulting from existing obligations, such as those already relating to SSSIs, where a favourable condition should be sought. Consequently, measures for achieving this within the SSSI should not form part of the net gain calculations for this application. Despite this, when the metric is recalculated without the contribution of these sections, it still achieves a 11% habitat net gain.

Notwithstanding the need to calculate the net gain independent of the improvements to the SSSI, I acknowledge the need for a single management plan for the whole site that includes the SSSI given it lies within the same ownership. Furthermore, I support the measures outlined in this plan to bring about improvements to the SSSI which should return it to a favourable condition.

Notwithstanding the above, there appears to be an anomaly in the figures. There are c48ha of open grass / heath in the metric baseline; 18ha of amenity grassland is to be created which can only be the golf course, and c21ha of open grass / heath remaining to be enhanced. This leaves 10ha unaccounted for. It is at odds with c.30ha of golf course as measured from existing figures provided and our GIS as measured from the plan provided (3.1, p11). This means an additional potential loss of around 10ha of original baseline grassland from the metric figures? This should be re-assessed as it is not clear as to what effect this may have on the net gain calculations.

Notwithstanding this apparent anomaly, it would seem that instead of 50ha of restored open parkland / heathland, there is now only 20ha of this habitat / land use, and 30ha of golf course. This detracts considerably from the original

proposals and emphasis and benefits placed on parkland restoration at Nyn Park. In my opinion, therefore, this places greater emphasis on achieving the best management of parkland / heathland areas that do remain.

In this respect I am disappointed that proposals for the North Parkland do not involve grazing to help recreate and maintain acid grassland / heathland communities. The reason for this is that it is considered too close to the house. Why? In terms of traditional management this is a nonsense as farmhouses were often if not invariably surrounded by their managed land, and there is a large woodland belt which separates the grassland from the new country house.

I am also concerned that despite the presence of indicator species and description as species-rich grassland, it is proposed to herbicide the whole North Parkland compartment twice. A more natural approach to bramble, docks and thistle should be considered - especially as it obviously hasn't been managed effectively for ten years. Also, the ability to graze both the SSSI heathland and North Park areas is easy as they are adjacent to each other making a sensible and efficient approach to livestock management. Consequently, I advise the current proposals for this area should be reconsidered.

Furthermore, I am also concerned that no re-coppicing is proposed for the ancient woodland area of Vineyard Wood. Why not? Hornbeam is proposed for thinning – is this to create high forest by selective removal? This will not generate the structural diversity that sensitive coppicing could provide consistent with historic management (if the description is accurate) and should be reconsidered. Muntjac are limited within the site given the surrounding deer fencing and should not cause a significant impact through browsing, but appropriate control methods could also be used to keep numbers low or eradicate them from the Park if necessary.

The northern side of the house and SW corner of Broadleaf Wood are the location of a historic orchard. This is shown on the second edition Ordnance Survey map and confirmed by Orchard East as consisting of 9 trees planted in rows. 8 apples and one plum. 3 of them were multi-stemmed. I am disappointed that this is not shown or discussed within the management plan. Since historic orchards are a priority-habitats, its maintenance and enhanced need to be included within the management plan.

With reference to the remaining sections of the site, the expected condition of each of the onsite habitat types are defined by the UK habitat definition following implementation of the management plan. Consequently, to achieve a good condition, 'Other Neutral Grassland' would be expected to have a species richness at the higher end of 9 - 15 species per m², whilst areas of lowland heathland should accord to its priority habitat description. Assessments should be made in respect of these definitions.

The condition statements should form the basis for ongoing reviews of the **measured** effectiveness of efforts to achieve the aimed at habitat states within

the time **frames specified** in the metric. In this regard I am concerned that most proposed grassland monitoring is in the early years; whilst this is acceptable in the establishment phases it fails to assess whether long term objectives are being met. Consequently, I suggest further monitoring of grassland is undertaken at around 7 years to assess the success of establishment and make any appropriate changes or take any actions if necessary, to address identified issues within the initial 10 year plan period, after which it can be reviewed.

Once the management plan has been agreed and the on-site net gain assessment confirmed, it should form the basis of a S106 agreement for a period of at least 30 years. The costs of this on-site management will be borne by the applicant as necessary to achieve the desired outcomes.

However, until the issues outlined above have been satisfactorily addressed, I am not in a position to advise the existing management plan and metric are acceptable. I am happy to discuss this further with the applicant in order to achieve a satisfactory outcome.

I trust these comments are of assistance,

Yours sincerely

Simon Richards
Ecology Advisor, Hertfordshire Ecology