

HERTFORDSHIRE ECOLOGY

Providing ecological advice to Hertfordshire's Local Authorities and communities

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Your Ref: 6/2018/2768/OUTLINE
Ask for: M J Hicks
Tel: 01992 556158
Date: 19/07/2021

Dear David

Application: Outline application for a large-scale mixed use development including 1,100 new homes and supporting infrastructure including a primary school, local centre and open space with all matters reserved
Address: Hatfield Business Park Hatfield AL10 9SL
Application No: 6/2018/2768/OUTLINE

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

1. Following the proposed development as outlined within the masterplan and within the Ecology Report, the scheme has been subject to a Biodiversity Net Gain (BNG) assessment using the Warwickshire Biodiversity Metric which has now been submitted in support of the proposals. At the time this was discussed with HE (June 2019), the NE V2 had not been published (July 2019) and now V3 has been published (July 2021). Whilst I would now advise using the latest NE metric, given that various metrics have been proposed for use in Hertfordshire in recent years, I accept the use of this metric for the purposes of this Outline application.
2. Whilst we note the Habitat Assumptions within the metric within Table A14.4-1, there is no submitted detail with on which we can provide an independent assessment, based upon the existing ecology survey and our own understanding of the site. Indeed, this information does not represent a metric, just its outputs; consequently, it is not possible to consider the basis for these assessments. Even here, we note that gardens and amenity grassland are included as contributing to future ecology which in practice is unreasonable given their functional use and inability to be subject to any legal agreement. However, we note that they are included within the NE metrics as contributing to potential biodiversity, which, nevertheless, cannot possibly compare with the existing ecological quality and quantity of the grassland resource to be lost.

3. The assessments are based on the habitat map Fig.A14.4 – 1. In this respect we note that over half of the site is considered to be species-rich semi-improved grassland, whilst the remainder is species-poor semi-improved grassland. Without seeing the full metric calculations, we cannot advise as to whether the proposed Unit loss has been calculated based on this assessment of distinctiveness and so has been properly considered, as there is no evidence as to how these figures have been derived.

4. We assume the survey data to inform the metric were the surveys undertaken in 2016 and 2018 for the ecological element of the Environmental Statement. These were broadly consistent with the survey HE undertook in 2015, although this found more Local Wildlife Site indicator species in the northern grasslands which were hay cut, but most were not common. The potential for all grasslands to improve given appropriate management is significant but clearly not currently a consideration of any long-term intentions. However, I remain of the opinion that the grazed species-rich semi-improved grassland area in the south of the site currently merits LWS status. As such, the majority of this area at least should not be subject to development if the LPA wishes to secure the ecological interest currently present.

5. The proposed new ponds are acknowledged; they are likely to differ in their ecological contribution to the proposed SUDS features which are expected to remain dry for the most part unless expressly designed to be large / deep enough enable water retention at all times – which is unlikely. The ponds will contribute to the local ecological resource within the proposed GI boundary around the edge of the site.

6. Currently, if the proposals are approved there will be an anticipated net loss of biodiversity of essentially 350 credits (Biodiversity Units), taking into consideration an expected 10% enhancement of value of the site at the outset. This assumes the remaining (and proposed) grasslands can be secured and managed to achieve the desired quality, which in any event is questionable. However, this calculation cannot be adequately scrutinised as the metric details – and these grassland and other habitat scores - have not been provided.

7. Furthermore, it is assumed that the required BNG can be delivered offsite. Currently, with no substantial land bank or potential receptor sites or projects identified within Hertfordshire, or an established Local Nature Recovery Strategy expected to inform this process, this assumption remains just that.

8. Ecologically, one of the largest tracts of developing moderate-good quality open grassland within a local network of habitats within the borough will be effectively lost. In its place will be various (depending on which proposed plan is used) thin green links and small open spaces around the edge, all subject to adjacent disturbance, fragmentation E-W by the access road and potentially barely capable of being grazed again given its size and amenity use. The ability to deliver anything ecologically meaningful - as has been achieved thus far - will be severely compromised, unless substantial and high quality Biodiversity Net Gain and another Country Park (in respect of amenity) can be provided

elsewhere. Neither are specifically identified in any of the proposals, which simply claim that many of the impacts on ecology have been mitigated.

9. It is acknowledged that the emerging local plan considers some potential for development at Ellenbrook Fields. However, the current proposals will be to develop perhaps 75% of the application site. The remainder of the Country Park site will be dug for gravel and restored over many years, albeit in a phased manner expected to 'maintain' an accessible country park throughout this period. This approach is wholly inconsistent with delivering the original intentions of the Country Park for ecological and amenity benefits.

10. Furthermore, the emerging plan promoted a 'Green Corridor' between key Green Infrastructure assets at Hatfield and Hertford. At its eastern end it identifies Panshanger Park in East Herts, an EH registered open parkland subject to Country Park and nature reserve creation as a planning requirement of mineral extraction. At its western end it identifies Ellenbrook Fields as a Country Park and gateway to more GI assets beyond. Effective loss of this of this resource seems incompatible with the Green Corridor approach.

11. Consequently, the possible development of this site which is considered by the local plan process seems also to conflict with the emerging Local Plan proposals themselves, undermining the legal agreement achieved from previous development approval. This would make the concept of a functional green corridor even more implausible than I originally considered. In terms of strategic planning, the LPA needs to be clear as to what it wants in order to provide appropriate planning guidance for this site, be guided by what the Inspector considers the plan should say, or reach a formal view as to the importance of the existing S106 agreement given that whatever the outcome, there will be profound implications for ecology locally.

12. On the basis of the above, I advise that the full metric is provided to enable proper scrutiny of its calculation. Without this, the LPA cannot assume the existing metric information is reliable, or that the result is an acceptable approach to any further development on this site, or that the proposals can be approved given the original intentions of the S106 Agreement if they are considered to remain reasonable and valid. I can provide further comments accordingly if the metric is provided.

I trust these comments are of assistance,

Regards,



Martin Hicks MCIEEM
Senior Ecology Officer, Hertfordshire Ecology