

Comments on examination documents EX156, EX 159 & EX 160

By the Central Herts Green Corridor Group (ID 1023214)

EX156 Landscape sensitivity assessment: Comments concerning The Commons Local Nature Reserve (LNR)

p.135. We agree with LUC's assessment that the "*The area contains blocks of BAP Priority Habitat deciduous woodland visible on the skyline. Small area of BAP Priority Habitat semi-improved grassland adjacent to The Commons*" and hence is rated "*High*".

But we agree with Ian Davis's comment that their final rating for area 45 as being of "*Low to moderate*" is totally inappropriate and fails to acknowledge this area's high ecological and heritage value and fails to highlight the following significant impacts on ecology that could arise from developments such as Birchall Garden Suburb.

The proposed BGS housing adjacent to the Commons Local Nature Reserve and Commons Wood and its proposed road would create a barrier to the present movement of wildlife and prevent species dispersal. The Local Plan at this point must first consider the present biodiversity value of these important linked habitats with regard to notable and protected species that currently are concentrated over this area. It is also important to recognise that any road through this wildlife corridor would kill species and prevent species dispersal.

The complexity of habitats are the reason for diversity of species there. A recent report concluded that there are over 150 species of principal importance (red listed and European protected species) recorded in the area between Commons Wood and Panshanger Park. These species must be considered at the planning stage.

The two hectares of annual winter conservation crop sown at the Commons LNR provides foraging habitat for endangered farmland bird species. Bird ringing and breeding bird surveys has shown links to roosting and other foraging areas in the corridor.

Other species that also need dispersal routes from the Commons LNR are slow worm and grass snake - both of these reptiles are recorded in high numbers. Great crested newts a European Protected Species) breed in a pond in Black Fan Fen. The housing proposed in this area would prevent movement, cause isolation of species and potential decline.

In this buffer a complex assemblage of ancient habitats lie to the most northerly part of the corridor along the southeast extent of present housing, particularly around the Commons Local Nature Reserve. A diverse and ecologically important area of ancient fen within The Commons Local Nature Reserve, known as Blackfan Fen is rare for Hertfordshire. A feature discovered in in 2000 is the Burnt Mound within the fen dating from the Bronze Age. Nationally rare this scheduled monument is of national importance.

There are also ancient field boundaries. Pollen analyses of an ancient layer of peat discovered in 2011 and beneath the present day vegetation has identified coppice management of fen habitat at the time when the Romans left Britain in the 5th Century. This supplements other evidence of prehistoric use such as flint tools and crop marks discovered in the adjoining arable land that shows human activity here from the Neolithic period.

This area of the corridor also coincides with the greatest density of heritage landscape assets and hence has important links to the heritage matters.

Green Gap Assessment Final Draft Report August 2019 (EX160)

This report by LUC rightly concluded on p.118 that there is a physical gap (between Hatfield and WGC) that contains a notable landscape feature (the Lea Valley) and is vulnerable to being closed, so that it would be appropriate to identify a 'gap policy area' in this location.

But they fail to make similarly such an assessment for the gap between WGC and Hertford for which the case is equally strong. We object to their simplistic summary statement (p.122) that "a Green Gap designation would not add much value in this instance. Development in the next Local Plan period is more likely to affect landscape character, ecology/ habitat network value, and setting of cultural heritage features than settlement separation."

We consider that these significant potential adverse impacts on landscape character, ecology/ habitat network value (as highlighted above), and setting of cultural heritage features mean that this area should essentially be taken forward as a gap policy area.

Similarly we do not agree with the landscape sensitivity for Area 45a (Welwyn Fringes between Welwyn Garden City and Hatfield). In light of the key views and openness of the landscape we would suggest that the sensitivity should be considered to be the same as Area 65 (eastern part), which is assessed as moderate-high in the report.

The views across the interfluvium (between the rivers Mimram and Lea) were designed to enhance neighbouring estates from the 17th century onwards. Today many of these remain, such as from Panshanger across the area of the proposed Birchall Garden Suburb to Hatfield House, Brookmans Park, Digswell House; illustrating the historical importance of the area. Further views between the Essendon ridge and the interfluvium make a significant contribution to the openness of the landscape of this area, as well as enhancing the setting of Hatfield parklands and the historic properties at Essendon (including the important cluster of interlinked parks) along the Essendon ridge (see Sarah Spooner; 2009 *A prospect two field's distance: rural landscapes and urban mentality in the 18th*).

These views and some heritage assets affected by the proposed Birchall Garden Suburb development are highlighted in Figure 1 with more related views in Figure 2 below.

The hydes assarted from Hatfield Wood at Holwell, Ludwick and Hatfield, provided clusters of built interest in an otherwise agricultural landscape (including woods which were managed commercially – coppicing, pollarding, pannage etc). Traces of Holwell Hyde indicate a DMV (Deserted Medieval Village), with windmill, road pattern, substantial boundary banks and ditches with boundary trees. Traces of much earlier human activity are found in the Neolithic finds and the Burnt Mound and Fen.

Figure 1: Heritage Assets and views potentially affected



Figure2: Indicative heritage views across the valleys and interfluvium

The 20th century Welwyn Garden City successfully provided the best of country and city. Key tenets were surrounding the city by an agricultural belt with zoning, as well as ease of travel within the town for work, home, leisure, commerce etc. Part of this were green fingers to allow easy access to the countryside. Concerning the Green Belt along the A414, the Salisbury Line which stated “*land on either side of this boundary, to a depth of 800ft shall remain as undeveloped land, to be used only for agriculture, games, sports or recreations*”¹. This remains a key separator between Hatfield and WGC. Garden Suburbs such as BGS do not align to these principles. They are out of keeping with the radial design of garden cities.

¹ Gascoyne Cecil Estates Note on Salisbury line in the Local Plan Examination documents.

EX159 WHBC response to Royal Haskoning report EX105

We strongly support the submissions by the Welwyn Garden City Society, Ian Davis and GCE concerning the inadequacy of WHBC's response to the Royal Haskoning report (EX 159). ***These submissions highlight a number of outstanding doubts and questions concerning contamination from this site.***

Indeed there are links between these contamination concerns and the CHGCG's concerns especially about ecology and hydrology which we set out briefly here.

The former landfill site contains important naturalised grassland which are valuable areas of habitat in its own right. Most of the former landfill area has been un-grazed since the late 1980's, except for the areas close to the south east corner that has had free roaming ponies over a large area. This has created a patchwork of varying sward with small areas of scrub starting to establish on the east side that slopes to the filter beds.

This mosaic of grassland and early scrub provide important breeding habitat for skylark, meadow pipit, grey partridge and other ground nesting birds that rely heavily upon invertebrate prey upon which they rear their young. The area is also important for breeding farmland birds, linnet and yellowhammer which is confirmed by breeding bird data gathered and recorded on the Herts Bird Club database over several decades.

Significantly the grassland supports very large populations of small mammals, field voles and shrews along with reptile and amphibian species which provide prey to support 10 species of foraging raptors. No raptors actually breed on the landfill area since there are no mature trees. But ringing data from the British Trust for Ornithology close to the sites boundaries show that barn owls have bred successfully on the Commons LNR arable area for the past 3 years. They predominantly hunt over the landfill grassland.

Medium size mammals such as brown hare, polecat are recorded on the area as are 10 species of bats near the fishing lake area in the northeast corner. Grassland creation is a priority habitat for protection and enhancement in Hertfordshire.

This naturalised grassland of the landfill area is in fact an excellent example of rewilding by nature that has developed these rich ecosystem assets that yield these important services and benefits at little or zero opportunity costs since alternative productive uses are not feasible on this land. There is clear evidence on many areas of the site but particularly on the top that hedgerows are in poor state and die and trees have never established due to the significant contamination at this former landfill site – see photo of this site below.

It would therefore be totally inappropriate to replace this grassland by woodland or an open recreation area -as well as not feasible on this former landfill site and out of line with Guidance concerning former landfill sites and would adversely affect biodiversity.



We consider that increased access via footpaths would not be a disturbance to this area's wildlife. But housing in close proximity or sports grounds could cause significant negative impact to the ecological assets highlighted above.

Hydrology

We also support Ian Davis' comments concerning hydrology and the need to mitigate any increase in flood risks downstream arising from any housing development. Also need to prevent any increase in water consumption which would place highly adverse impacts on increasingly strained water resources. To avoid this, developments will need to comply with the tightest standards to limit water consumption there through the full implementation of all water saving measures including SUDS, grey water harvesting and community level grey water recycling alongside property water efficiency measures. ***However, there are concerns and as yet unanswered questions about the feasibility and desirability of SUDS at the proposed housing development at both the Northern and Southern sections of BGS due to concerns about impacts of leachate contamination from the former landfill site there. The Royal Haskoning report and WHBC's response to it in EX 159 fails to address these concerns. This raises further doubts about the appropriateness and viability of BGS.***

There has been polluting leachate breaking out from the (toxic) waste disposed at the former landfill site – we can identify these with red flags if the Inspector wishes. A buffer is needed to mitigate their impacts on the water course there. Moreover, filter beds are needed there to reduce the impacts of the toxic leachate from polluting this water course. However, the width of this buffer and the filter beds needed depend on ***the type and significance of the pollutants in this leachate, about which there is considerable uncertainty and as yet unanswered questions, which EX159 (WHBC Response to Royal Haskoning Report EX105) fails to address. We support GCE, Ian Davis and WGCS comments concerning this matter.***

Central Herts Green Corridor Group

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