

Objection to the Church Wood, Three Houses Lane development for the following ecological and environmental reasons.

Green Belt

Church Wood is in the Green Belt and by definition any development is inappropriate unless Very Special Circumstances can be demonstrated.

The unauthorised development has impacted tremendously on the surrounding woodlands of Church Wood and Crouchgreen Wood and according to the ecological surveyor's Preliminary Summary accompanying the planning application

1.4 No impacts to designated sites are anticipated provided a Construction Ecological Management Plan (CEcMP) is prepared to avoid indirect impacts to nearby Church Wood, Graffridge Wood, and Crouchgreen Wood during construction. This includes preventing noise and light pollution, dust, and waste materials impacting the woodland habitats and their associated flora and fauna.

Was this ever carried out as there is no evidence of this in the publicly available documents?

Ancient woodland

Church Wood & Crouchgreen Wood are both Local Wildlife Sites and Church Wood is also to be included in the new **Ancient Woodland Inventory** and I quote from the Herts Environmental Record Centre (HERC) Ancient Woodland Data Officer

‘We have multiple lines of evidence confirming Ancient status, including inclusion on historic maps including Epoch 1, Bryant and OS Drawings; presence of Ancient Woodland indicator species and ancient coppicing features. Because of this evidence I believe the Woodland to be Ancient.’

Ancient woodland takes hundreds of years to establish and is defined as an irreplaceable habitat. It is a valuable natural asset important for:

1. Wildlife (which include rare and threatened species)
2. Soils
3. Carbon capture and storage
4. Contributing to the seed bank and genetic diversity
5. Health and wellbeing
6. Cultural, historical and landscape value

It includes ancient semi-natural woodland mainly made up of trees and shrubs native to the site, usually arising from natural regeneration, undisturbed soil, ground flora and fungi.

Direct effects of development can cause the loss or deterioration of ancient woodland or ancient and veteran trees by

1. Damaging or destroying all or part of them (including their soils, ground flora or fungi).
2. Damaging roots and understorey (all the vegetation under the taller trees).
3. Damaging or compacting soil.

4. Damaging functional habitat connections, such as open habitats between the trees.
5. Increasing levels of air and light pollution, noise and vibration.
6. Changing the water table or drainage.
7. Changing the woodland ecosystem by removing the woodland edge.

Local Wildlife Sites (LWS)

Church Wood & Crouchgreen Wood are Local Wildlife Sites.

Local Wildlife Sites have protection in the National Planning Policy Framework (NPPF).

Can I refer you to Paragraph: 013 Reference ID: 8-013-20190721 of the Government's Natural Environment guidance:

Local Wildlife Sites are non-statutory sites designated at a county level as being of ecological significance and are recognised in Local Authority development plans. They are a subset of classifications within the Local Records Centre Sites database. The aim of this identification is to protect such sites from land management changes in connection with planning applications, which may lessen their nature conservation interest, and to encourage sensitive management to maintain and enhance their importance. Although LWS have no statutory protection, their importance is recognised in Local Plans and the National Planning and Policy Framework (NPPF), and they are a material consideration in the planning process. The planning and policy guidance that accompanies the NPPF describes them thus:

"Locally designated 'Local Wildlife Sites' are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery....National planning policy expects plans to identify and map these sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks".

Planning policies and decision-making should seek to protect and enhance areas designated for their biodiversity importance, as appropriate to their level of significance. This includes effective protection measures for ancient woodland, Local Nature Reserves and Local Wildlife Sites.

Development projects should minimise impacts on biodiversity by adhering to the 'mitigation hierarchy' of 'avoid, mitigate, compensate'. In order to properly identify the potential harm to biodiversity it is important that the biodiversity value of development sites is properly understood.

The impact of development on the connectivity and coherence of the ecological network must be considered. Development should be planned to avoid habitat loss and fragmentation, and opportunities should be sought to improve ecological connectivity, including through the creation, restoration and enhancement of linking habitats and 'stepping stones' through the landscape.

Local authorities are advised to take a strategic approach to planning."

Both Church Wood & Crouchgreen Wood are ancient Hornbeam *Carpinus betulus* coppice woodland LWSs with Pedunculate Oak *Quercus robur* standards. According to a survey carried out by Hertfordshire Environmental Records Centre there are, in

addition to the Hornbeam & Oak trees, 18 AWIS Ancient Woodland Indicator Species and 33 flowering species including Bluebells *Hyacinthoides non-scripta*, Primroses *Primula vulgaris*, Sweet Woodruff *Galium odoratum*, Wood anemone *Anemone nemorosa* and other important ground flora.

These have now been destroyed by the spreading and compaction of spoil by diggers and dumper trucks from site excavations. Wetland destruction has been caused by the draining and removal of a large pond, removing an important habitat for invertebrates, amphibians, birds and mammals. The Froglife Trust advises 'Local authorities should specify that a survey should be undertaken to check for rare species (particularly Great Crested Newts) before a development can take place'.

Concrete pouring to provide hard standing, and the massive lorries, concrete mixers and construction traffic at the site on weekdays and at weekends too are causing noise and distress to fauna and flora.

Dumping of clay subsoil spoil is also covering the spreading roots of the trees which could eventually kill them. Healthy and adequate rooting space is essential for trees to thrive. RPA Root Protection Area is most commonly used in a planning context to avoid loss or damage to trees where they are being retained within a development. Anyone involved with trees and development and planning permissions should refer to it.

Biodiversity Net Gain (BNG)

BNG is an approach to development. It makes sure that habitats for wildlife are left in a measurably better state than they were before the development.

Developers must deliver a BNG of 10%. This means a development will result in more or better-quality natural habitat than there was before development. It was introduced in February 2024.

Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990 and regulations made under Schedule 7A contain most of the statutory framework for mandatory biodiversity gain (referred to as 'biodiversity net gain'). With some exceptions every grant of planning permission is subject to the condition **that development may not begin until a biodiversity gain plan has been approved** by demonstrating how the objective of delivering at least a 10% gain in biodiversity will be achieved.

There is no provision, demonstration, calculation or consideration in the Application for Biodiversity Net Gain.

Local Nature Recovery (LNR)

This Planning Application also makes a mockery of the Government's new Local Nature Recovery programme which includes the proposal of planting of trees and hedgerows and more sustainable management of existing woodlands.

According to DEFRA's local nature recovery strategies

'All public authorities have a duty to conserve and enhance biodiversity.

The areas that LNR will recognise as being of particular importance for biodiversity (nationally designated sites, local nature reserves, local wildlife sites and irreplaceable habitats) are those which the land use planning system in

England recognises through the National Planning Policy Framework. This is the baseline on which LNR will be built. These actions are intended to help nature itself and to also help improve the wider natural environment.'

I object most strongly to this Planning Application for the reasons I have set out in some detail above, and would also ask that should the Application be refused then the damage to the two Local Wildlife Sites be reversed and as far as possible returned to their condition before the current unauthorised works were started.

[REDACTED]

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