



Hertfordshire Natural History Society

Planning Strategy Team,
Hertsmere Borough Council,
Civic Offices,
Elstree Way,
Borehamwood,
Herts, WD6 1WA

12th December 2018

Dear Madam or Sir,

Planning for Growth. Potential Sites for Housing and Employment

I write on behalf of the Management Committee of the Hertfordshire Natural History Society (HNHS) in response to the public consultation document on potential sites for housing and employment published by Hertsmere Borough Council in October. We wish to register our strong objections to the inclusion of the area identified as 'H2' as a suitable site for housing development in a new Local Plan. This site includes a large part of the wildlife recording area known as Tyttenhanger Gravel Pits. Our concerns relate to the very negative impact that development would have on biodiversity both within the site and its surrounding areas.

HNHS is registered charity, founded in 1875 and run by volunteers, with a remit to promote the study and recording of wildlife in Hertfordshire and encourage a wider interest in natural history including the conservation of wildlife, habitats and geological features. It is the parent organisation for the Herts Bird Club, which has been actively working for more than 20 years to conserve the regionally important colony of Tree Sparrows (*Passer montanus*) that breeds within the site at Courser's Farm.

We strongly endorse the Bird Club's view that development of H2 would extinguish one of this species' last footholds in the south of England. We also draw attention to the evidence they have provided in their own submission that the site is important to many other bird species categorised at the highest 'Red List' level of national conservation concern by DEFRA's Joint Nature Conservation Committee (JNCC). These include 13 species known to breed on or close to the site.

We additionally highlight the presence on the site of species accorded priority in the UK Biodiversity Action Plan. These include mammals (notably Brown Hare (*Lepus europaeus*) and Hedgehog (*Erinaceus europaeus*), amphibians (Common Toad (*Bufo bufo*) and butterflies (Small Heath (*Coenonympha pamphilus*) and White-letter Hairstreak (*Satyrion w-album*)).

Development of H2 would also, in our view, raise concerns about conserving the rich habitats and biodiversity found in the adjoining Mymms Wood complex, including Walsingham Wood.

We join our Bird Club colleagues in reminding you of Section 41 of The Natural Environment and Rural Communities Act 2006 concerning the need for reasonably practicable steps “to conserve living organisms and types of habitat which in the Secretary of State’s opinion are of principal importance for the purpose of conserving biodiversity”. The Tree Sparrow is listed as a priority species in the UK Biodiversity Plan, along with 18 other bird species that regularly occur at Tyttenhanger.

Most of all we urge you to take full account of the important provisions relating to the protection and enhancement of biodiversity in the Government’s National Planning Policy Framework (NPPF 2018). These not only require planning policies to minimise impacts and provide net gains for biodiversity, but also to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species. The National Framework is clear in stipulating that where significant harm to biodiversity cannot be avoided, adequately mitigated or compensated for, planning permission should be refused.

From the evidence available concerning the loss of other Tree Sparrow colonies, we are not aware of any effective mitigating or compensating measures that could be taken to conserve (or expand) the breeding population and allow development on site H2 to be approved. If planning permission(s) were granted, we would expect this bird of national conservation concern to be lost as a breeding species to Hertfordshire and much of the south of England. On that basis, we submit that development on the H2 site that complied with NPPF 2018 would not be permissible and that the site should not be included in the new Local Plan.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'David Utting', written in a cursive style.

David Utting
HNHS Secretary
250 Sandridge Road,
St Albans AL1 4AL