

Re: Consultee comments for 25/1020/OUT

The site is within Metropolitan Green Belt and there is a Right of Way (Footpath 013 Watford Rural) runs northeast / southwest across along the northern boundary of the site. The site comprises of a series of undulating fields of former pasture, bound and sub-divided by dense hedgerows of predominantly Blackthorn, with numerous notable/veteran, Oak and Ash trees both within the hedges and in-field. The tree's ages have not been estimated, but the stem girths have been calculated.

Whilst the stem girths, and possibly the ages, of many of the trees may not accord with the girths/ages outlined in some veteran tree assessment tools, many of them have multiple features associated with veteran trees, such as extensive decay, hollowing, deadwood in the crown, habitat spaces, major storm damage and Fungi. However, there is no definitive veteran tree assessment criteria, and the National Planning Policy Framework does not specify the use of any particular assessment tool, but simply advises:

'Ancient or veteran tree: A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage'

And that;

'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons (70) and a suitable compensation strategy exists;

70 For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.'

Of the three criteria for veteran trees referenced by the NPPF (age, size and condition) arguably the most important aspect is tree condition, as the exceptional biodiversity that make these trees irreplaceable habitat stems from the features they acquire over time. The unique diversity of wildlife associated with veteran trees is closely linked, not only to the trees, but also the wildlife's interaction with the hedgerow and grassland habitats.

The outline plans indicate that there will be little direct impacts on notable / veteran trees on-site, with no trees needing to be felled or pruned. Although tree T1, close to the proposed entrance to the site, may be under threat from the need to create suitable visibility splays, and construct an access road and footpaths of a specification that Highways would agree to adopt. Some sections of existing

hedgerow would also need to be removed and some development is proposed to take place within the root protection areas of retained trees.

The potential for indirect impacts on trees, and hedgerows, and the deterioration of irreplaceable habitats over the longer term are significant. The proposal to site up to 256 new dwellings in grassland, in close proximity to large numbers of notable / veteran trees and mature hedgerows would result in a significant increase in the residential population close to these irreplaceable habitats.

As the trees move into their veteran phase of life, their ecological value will only increase, and the wildlife associated with them (such as bats, fungi and invertebrates) which is also reliant on the grassland and hedgerow habitats. As a result, the loss of grassland and degradation of the hedgerow will be harmful to biodiversity associated with the notable/veteran trees.

This increase in population would inevitably lead to additional recreational pressures on the trees and hedgerows, such as the compaction of soils around root zones; erosion and widening of footpaths through green space areas; and the disturbance of wildlife, through activities such as dog walking. The increased population will also increase recreational pressure on existing, publicly accessible green space, in particular Merryhill Wood, which borders the site to the east.

Other unintentional impacts of an increased population would be additional localised air and water pollution from vehicle movements; the use of pesticides in gardens and allotment areas; and anti-social behaviour issues. This may include vandalism and fly-tipping, which would contribute towards the deterioration of these irreplaceable trees and habitat.

Placing development close to notable / veteran trees and incorporating them into more formal green spaces will also increase the level of risk should a tree fail. This could be detrimental to these ecologically important trees if overzealous safety works to fell or heavily prune them is undertaken to address perceived safety concerns.

Despite the cessation of grazing, the combination of grassland, hedgerow and large numbers notable/veteran trees, creates a visually attractive, high quality pastoral landscape. Although the majority trees and hedgerow would be retained, the development of the grassland areas would lead to a significant loss of openness, and result in urban sprawl, and encroachment into the wider countryside. This would be harmful to landscape of the local area, and development in close proximity to the significant trees and hedgerows on the site would lead to their degradation over time.

Kind Regards

Alex

Please note that this represents an informal view by an officer. The views contained within this email do not constitute an official determination, are not legally binding and do not bind the council to a particular course of action.

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