

From:

Sent: 02 April 2025 15:20

To: Claire Westwood <[REDACTED]>

Cc:

Subject: 24/2073/OUT - Land To North Of Little Green Lane Croxley Green

Hi Claire,

The site is in Metropolitan Green Belt and the woodland within its boundary is recorded as ancient on the Ancient Woodland Inventory. Within the fields are a number of notable and / or veteran field and hedgerow trees. There is a Right of Way (Public Footpath Sarratt 017) running east / west across the northern end of the site and another (Public Footpath Sarratt 063) running north / south along the western boundary. There are trees and woodland bordering the site that are protected by Tree Preservation Order (TPOs 182; 026 & 118). Most of this woodland is also recorded as ancient, and some of the woodland (Whippendell wood) is a designated SSSI (Site of Special Scientific Interest).

The National Planning Policy Framework states 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.'

The outline plans indicate that there will be no direct impacts on trees and woodland on the site. With no trees needing to be felled or pruned, and no loss of irreplaceable habitats. In addition, no development is proposed to take place within the root protection areas of retained trees. Although some short sections of existing hedgerow would need to be removed.

However, the potential for indirect impacts on trees and woodlands, and the deterioration of irreplaceable habitats over the longer term, are significant. The proposal to site up to 600 new dwellings within 30 metres (at the closest points) to ancient woodland and notable / veteran trees would result in a significant increase in the residential population close to these irreplaceable habitats. This increase in population would inevitably lead to additional recreational pressures on the trees and woodland, such as the compaction of soils around important trees; the trampling of ground flora in woodland areas; erosion and widening of footpaths through woodland areas; and the disturbance of wildlife, through activities such as dog walking.

Other unintentional impacts of an increased population would be increased localised air and water pollution from vehicle movements, and the use of pesticides in gardens and allotment areas.

There will also be additional anti-social behaviour issues relating to an increased population. This may include vandalism; arson; off-road motorcycling and mountain biking; and fly-tipping, which would all contribute towards the deterioration of this irreplaceable habitat. Placing development close to notable and 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.

To prevent any long-term deterioration of these irreplaceable habitats would require a suitable compensation and mitigation strategy. The plans indicate that buffer zones between the housing areas, and the woodlands and trees, would be created, comprising of a Country Park, formal areas of green space, and allotment sites. These will provide some mitigation but over the long term, managing visitor access and pressure to the surrounding woodland and being able to deal with antisocial behaviour issues will be key to preventing the deterioration of the trees and woodlands. To successfully manage the open space, and visitor access and recreation, would require some form of ranger team or on-site maintenance staff to be able to respond to issues effectively and quickly. This ongoing management and maintenance would need to be adequately funded and resourced to ensure the irreplaceable habitats are protected over the long term.

Kind regards

Alex Laurie MA ArborA MCIEEM

Principal Trees and Woodlands Officer

Three Rivers District Council

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