

CALL TO ACTION!

Save the Wildlife of Tyttenhanger Gravel Pits & Surrounding Area

Hertsmere Borough Council has recently published its Draft Local Plan and, as its centrepiece, proposes a massive new housing development in the Tyttenhanger Gravel Pits area. The new village would be named Bowman's Cross (labelled as site NS1 in the Draft Local Plan) and would cover an area of approximately 2,000 acres with 6,000 new dwellings and small industrial units.

The Council's main justification for building on this Green Belt site is that the land is largely poor quality and inaccessible. This is simply not true. The area constitutes a beautiful and varied habitat for wildlife, crisscrossed by footpaths and bridleways widely used by dog walkers, cyclists, horse riders, ramblers, families, and wildlife enthusiasts.

The value of the site for wildlife is well-documented with local birdwatchers regularly recording over 70 species of birds in a day and producing an annual Tyttenhanger Bird Report. Here are some of the key facts about the Tyttenhanger area as a place of wildlife:

- Over 200 species of birds have been recorded at the site.
- Top of the list are the breeding red-listed Tree Sparrows that are the last remaining colony in Hertfordshire and quite likely to be the last remaining breeding colony in the Southeast of England.
- The site is also home to nesting Sand Martins – a breeding colony that meets the criteria for consideration as a SSSI (Site of Special Scientific Interest).
- At least 18 other red-listed species make Tyttenhanger their home – at least 13 of which stay to breed.
- At least 28 amber-listed species also make Tyttenhanger their home with at least 11 breeding.
- 18 of the species present, have been identified as 'priority species' for conservation by Defra.
- In addition, at least 11 Schedule 1 protected birds either breed or over-winter in the Tyttenhanger area.
- The site is vitally important to migrating birds too with its varied habitats and water bodies.
- At least 11 species of mammal are present at the site, including the endangered Brown Hare and Hedgehog along with the nationally protected Badger.
- The site is also important for another 'priority species' – the Common Toad.
- At least 29 species of butterfly have been recorded in the area – among them 'priority species' – along with a wide range of other insects including at least 19 species of dragonfly.

The Tyttenhanger Working Group comprising the Herts Bird Club (part of the Herts Natural History Society), the Herts & Middlesex Wildlife Trust and the Southeast Herts RSPB Group have been advising the Council as to the threat posed to the wildlife and how the site's wildlife might be preserved should development go ahead.

Although the Draft Local Plan acknowledges the existence of the Tree Sparrows the advice set out by the Tyttenhanger Working Group to drastically reduce the scale of the development and make significant provision for wildlife as part of those plans has not been heeded.

If the plan goes ahead in its current form one of the last Tree Sparrow colonies in the Southeast of England will be lost along with a wide variety of other wildlife.

HOW CAN I HELP?

1. Please take a look at the Local Plan: <https://bit.ly/3aIMKQK>

The pages most relevant to Bowman's Cross development and the Tyttenhanger area pages are:

- 46- 49, (page 49 also includes mention of a nature reserve around Tyttenhanger Lakes under green infrastructure)
- Pages 110-113.
- Pages 173-176 are also relevant from a biodiversity point of view.

2. Submit your objections to Hertsmere Borough Council NO LATER THAN 6th December 2021 using this link:

<https://hertsmere-consult.objective.co.uk/portal/>

Alternatively, you can:

- Email Hertsmere at local.plan@hertsmere.gov.uk or,
- Write to Hertsmere at: Hertsmere Borough Council Civic Offices Elstree Way Borehamwood Herts WD6 1WA

KEY POINTS TO MAKE WHEN COMMENTING:

- You can comment as many times as you wish up until the deadline of 6th December 2021
- You can comment on other aspects of the development as well as the threat to wildlife outlined here (such as infrastructure, noise pollution and so on).

Please write your objection in your own words but, when commenting about the threat to wildlife, use the information above and in particular the key points below:

- Contrary to the Council's suggestion that the area is predominantly of 'low-value' and 'inaccessible' the area is a beautiful habitat for wildlife, crisscrossed by footpaths and bridleways, widely used by dog walkers, cyclists, horse riders, ramblers, families and birdwatchers.
- In its current form the Bowman's Cross development as proposed in the Draft Local Plan would cause significant harm to the biodiversity of the area. Section 15 of the NPPF is even very clear about protecting Habitats and Biodiversity. Section 175 a) states:

"if significant harm to biodiversity resulting from development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or as a last resort, compensated for, then planning permission should be refused;"

- The site is home to the last colony of 'red-listed' Tree Sparrows in the county and probably the Southeast of England and the council should abide by National Planning Policy Framework paragraph 179 in order to protect these birds. The wording of the paragraph is shown below:

179. To protect and enhance biodiversity and geodiversity, plans should:

(a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of

importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation ; and

(b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

- The site is also home to a wide variety of other important wildlife and a place of rich biodiversity that should be preserved.
- The Council has not heeded the advice of the Tyttenhanger Working Group that they consulted as wildlife experts:
 - The development has not been reduced in scale and still proposes 6,000 new homes.
 - The development has not been kept to areas south of Coursers Road but proposes buildings and playing fields north of Coursers Road and right up to the edge of Tyttenhanger Gravel Pits.
 - The Draft Local Plan suggests the Tree Sparrows can be relocated when in this was not considered an option as they would not survive, and the area left to them would be too small.
 - The Tyttenhanger Working Group advised the creation of a large and significant nature reserve to the north of Coursers Road to compensate for the loss of biodiversity south of the road but, while the idea of a nature reserve is mentioned in the Draft Local Plan, with the current scale of the development it would be too small and adjacent to 2 schools and lots of disturbance.
 - The idea of a nature reserve is left vague and should be included as a detailed part of the proposals explaining exactly where it would be and how it would be managed.
 - Appendix 3 of the Draft Local Plan ‘Designated Open Spaces and Local Green Spaces’ has no content and therefore does not provide any of the necessary detail. This should have been completed before publishing the plan.

ONE FURTHER ACTION YOU COULD TAKE...

Write to your MP!

- If you live in Hertsmere they need to take seriously and act on your letter.
- If you don't live in Hertsmere, still write to your MP but make it clear that your concerns relate to matters that affect not just Hertsmere but the county and the region:
 - Loss of Green Belt
 - Loss of the Tree Sparrows

**THANK YOU IN ADVANCE FOR YOUR SUPPORT AND DON'T FORGET...THE
DEADLINE FOR COMMENTING IS:**

6th December 2021