



Re: 21/0573/FUL - Proposed Warehouses – Maple Cross - OBJECTION

Dear Claire,

We are at a loss to understand how Herts Ecology can possibly have arrived at their most recent response to you as it would appear that they have changed their minds – yet again.

Statutory consultees play an important part in ensuring that planning decision-making is informed, fair and effective. However if their advice falls short of clear, positive and transparent information then the considerable weight offered to their advice should be withdrawn and advice sought from an alternative more reliable source.

Herts Ecology have failed in their duty to give proper advice and instead have chosen to offer a myriad of different ways which they claim will deliver 'biodiversity net gain'. Not only have they adopted an inconsistent approach across the district where they sanction the use of the DEFRA metric but they are also constantly changing their approach to the proposed warehouses site.

At the hearing after the Inspector challenged them about not using the metric Herts Ecology stated that if they were to respond again they would use the DEFRA metric. So what has happened subsequently? In their response on 13.4.2021 they admitted that the only way to measure biodiversity net gain would be by using the metric. Whilst they go on to say that the metric is currently not mandatory they have no problem using the metric on other sites, one of which in particular is under your remit – Killingdown Farm. To not apply the metric to the proposed warehouses site not only shows inconsistency but would also suggest that the Maple Cross proposed warehouses site is being treated very differently to development eg in Croxley Green.

So the question that naturally arises: why, in this case, are Herts Ecology changing their stance to one which incontrovertibly favours the developer?

Whilst Greengage obviously set out to prove that the site was of little value they therefore failed to note much of the vegetation and wildlife that was in existence, Herts Ecology support them by omitting to mention not only that by the time of their survey large swathes of valuable land had been trashed by the developer's agents but they also provided an incomplete assessment that chose to overlook much of what had already been noted by both Herts Middlesex Wildlife Trust and the Maple Lodge Conservation Society. Consequently Herts Ecology's suggestions therefore lack credibility due to the various omissions.

So Herts Ecology have given you five options to choose from that fall well short of being informed, fair and effective. I would especially draw your attention to their option 4 where they have stated a compromise between any of their suggestions cannot be justified and then in option 5 have suggested a compromise! The best chance of achieving biodiversity net gain is by using the metric however unless the correct information is used even this will not/cannot provide BNG.

Fortunately for many legal reasons this proposed development cannot be sanctioned but we would urge you in future to use the services of a competent ecologist who does not differentiate between different areas of Three Rivers, takes the issue of delivering biodiversity net gain seriously and is keen to ensure the use of the DEFRA metric on **all** large scale developments.

Regards,


Maple Cross and West Hyde Residents Association