

## **Evidence for St Albans City and District Local Plan Examination - Stage 2 Hearing.**

### **“Seeing is Believing”: The Soul of Bedmond Lane Wildlife Meadow.**

#### **Introduction.**

**My evidence relates directly to Issue 2 – The Green Belt Review.**

**I seek to show that the much vaunted Arup Review - Stage 2 Green Belt Review 2023 (GB 02.02) - has fundamental weaknesses: conspicuous lacunae.**

**As argued in detail in my Regulation 19 submission, there is a significant disconnect between established national policies (and the policy claims of the Draft Local Plan) and the methodology used by the consultants (Ove Arup & Partners Limited) whom the council has relied upon to act on their behalf in order to identify potential sites for development. This is because the Arup Report singularly fails to use Biodiversity as a criterion in differentiating between the Green Belt sites proposed (see Part 1 points (i) to (iv) of my Regulation 19 submission).**

**Arup also failed to identify the basis for choosing the 5 “major policy constraints” precluding development relevant to release of land from the Green Belt. And, crucially, Arup has not recognised the major policy constraint which is the emphasis placed in the NPPF on the requirement to encourage biodiversity, green infrastructure and natural environment as fundamental to people’s health which is consistent with the aims promoted by the Environment Act 2021.**

**The loss of the invaluable Site M3, Bedmond Lane Wildlife Meadow is an exemplar of this failure to use biodiversity value as a reason to include or to exclude sites. In this respect, I submit both ARUP and SADC are guilty of all words and no action. This is reflected in a lead article in the St Albans Times on 27 July, headed “*Council ridiculed for ignoring own environmental policies by including wildlife site in Local Plan.*” The editorial refers to: “... the ludicrous decision to include Bedmond Lane Meadow as a potential housing site.”**

**Bedmond Lane Wildlife Meadow (shown as ‘M3 – Bedmond Lane, St Albans AL3 4AH’ in the site allocations plan) is not just an ordinary field in the Green Belt. It is extraordinary and incredibly special in supporting a massive range of biodiversity. Literally, it needs to be seen to be believed.**

**In the VERY complex sphere of planning laws and regulations, my submission under Regulation 20 is simple. In essence, my detailed and extensive evidence - in words and pictures - is aimed at walking you through the meadow so you can see for yourselves (albeit through the lens of my eyes and my camera) the huge and incredible biodiversity and breathtakingly rich mosaic of different forms of life this meadow sustains.**

It is a perfect example of a complete and diverse ecosystem encompassing all living organisms (plants, animals, fungi and microorganisms) within a specific area, together with their complex interactions with the non-living components of their environment (such as sunlight, soil, and water) and the flow of energy and cycling of nutrients between them.

Rewilding over the past three decades shows nature at its best: organically reclaiming this abused and neglected piece of land, allowing natural processes to recover and flourish. Inherently, the beauty and life of the wildlife meadow is like an ecological kaleidoscope, constantly changing through the seasons. It is breathtaking and unbelievably spectacular and its value to the environment is immense.

To lose this wildlife meadow would be a travesty: neither fair, nor just, nor right. Yet that is what is proposed by the fundamentally flawed methodology.

My evidence is in two parts.

The first is a description of Bedmond Lane Wildlife Meadow: in words.

The second is a description of Bedmond Lane Wildlife Meadow: in pictures. (This is in the form of photographic and video evidence shown in Part 2 and at Appendices A to E).

It should be noted this evidence builds upon and strengthens my argument submitted under Regulation 19 and the two should be read together.

#### **Part 1. The Soul of Bedmond Lane Wildlife Meadow: In Words.**

As mentioned, Bedmond Lane Wildlife Meadow is not just an ordinary field in the Green Belt. It is extraordinary and incredibly special in supporting a massive range of biodiversity. Of great significance, the biodiversity value of Bedmond Lane Wildlife Meadow has, just two months ago, been highlighted in the draft Hertfordshire Local Nature Recovery Strategy (LNRS). The LNRS is a new, England-wide approach to targeting nature recovery that is legally required by the Environment Act 2021. More than 75% of Bedmond Lane Wildlife Meadow has been classified as an 'Area of particular importance for biodiversity' (APIBs) and a further 15% as being an 'Area that could become of particular importance for biodiversity' (ACPIBs). It is recognised as having a number of potential 'flagship species' in a 'priority habitat'. About 75% is recorded as 'Grassland and heathland'. (Please see photographs from LNRS Mapping Viewer at Appendix A.)

The LNRS is just the latest in a chorus of endorsements from ecologists, all speaking with one voice supporting the status of the meadow as "*a de facto Local Wildlife Site*". For

ease of reference, and because they form a description of the meadow by independent and a diverse range of experts, I summarise these below.

This wildflower and wildlife meadow has, in previous planning applications and formal documents, been described by the Hertfordshire & Middlesex Wildlife Trust (HMWT) as *"Unique in St Albans and of significant ecological value and importance ..."*. HMWT states: *"The site itself is a species rich mosaic of habitats including species rich chalk grassland, species rich neutral grassland and scrub"*.

HMWT goes on to say *"By including this site in the District Plan as having potential for development, the Council will be endorsing the destruction of Green Infrastructure for its role in combating Climate Change and supporting biodiversity, along with its value for recreation, health and wellbeing, and landscape value ... It could not be more precious for people and wildlife ... It is the epitome of the sort of site that should be protected in accordance with local and national policy."*

*"It easily qualifies as a local wildlife site and the only reason that it is not designated as such is because the landowner permission required to designate the site has not been given. It is a de-facto Local Wildlife Site and should be considered as such."*

*"It cannot be replaced by equivalent or better provision in terms of quantity and quality (of biodiversity) in such a suitable location. It just can't." HMWT conclude: "Categorically, for the avoidance of doubt, it will not be possible to deliver biodiversity net gain on this site, within the proposed plans."*

The meadow is also recognised by the Hertfordshire County Council Ecologist as *"floristically rich"* and *"supporting a sufficiently diverse range of plants to meet Local Wildlife Site status"*.

In the past months, a number of ecologists - ranging from independent HMWT ecologists to Hertfordshire County Council ecologist – have lined up supporting the status of the meadow as *"a de facto Local Wildlife Site"*. Specifically, I have correspondence from the following experts corroborating this:

(a) Leslie Davies, former Chief Executive Officer of HMWT;

- (b) Astrid Biddle, ecologist HMWT; (who states in an email to local MP, Daisy Cooper: “... *it is immediately obvious that the site qualifies as a Local Wildlife Site*”
- (c) Chloe Edwards, ecologist, Director of Nature Recovery, HMWT; and
- (d) Simon Richards, Hertfordshire County Council Ecologist.

**Even the ecologists Ethos Environmental Planning, commissioned by Cala Homes (the owner of the land) recorded the biodiversity value of the meadow describing the “... *northern grassland as particularly species rich*” and acknowledging that “*Chalk and neutral grasslands are listed as priority habitats under Hertfordshire’s Local Biodiversity Action Plan.*”**

**It is a perfect example of a complete and diverse ecosystem encompassing all living organisms (plants, animals, fungi and microorganisms) within a specific area, together with their complex interactions with the non-living components of their environment (such as sunlight, soil, and water) and the flow of energy and cycling of nutrients between them. This meadow supports a huge variety of life forms and, in essence, it is self-sustaining where all parts are interconnected and function together to maintain life and balance. Complete ecosystems such as this provide essential elements for humans, such as clean air and water, pollination, and climate regulation.**

**It is one of the very rare examples of a true natural wildflower and wildlife meadow that remain in this county. And it has been created entirely by nature without human intervention.**

**Bedmond Lane Wildlife Meadow (site M3) covers 14.5 acres of beautiful countryside** and is divided into two fields by public footpath number 095. A second public right of way, footpath 032, runs all along its eastern boundary. It is situated on the edge of St Albans and adjoins the south-west corner of Verulamium Park. **It thus forms part of a perfect corridor for nature from St Albans Cathedral and Abbey in the centre of the City, to surrounding countryside.** It is bordered by Bedmond Lane, Hemel Hempstead Road, King Harry Lane, Parklands Drive and Mayne Avenue.

It is relevant to point out that in the 1990s the character of the meadow underwent a radical transformation. It used to be an open, predominantly grassland meadow from which hay was harvested annually. However, it was razed to the ground and almost all topsoil was

removed by the landowner, William Old Ltd, who then imported and dumped from other sites a considerable amount of low-grade spoil containing boulders, bricks and other debris. Following objections from local residents, the owners were compelled by the local authority to sieve the spoil with heavy plant machinery to remove the worst of the boulders, bricks and other debris. Hence the success of the land as a wildflower and wildlife meadow because the soil that remained is impoverished (and well drained) which is a perfect foundation to sustain such an environment.

**Rewilding over the past three decades shows nature at its best: organically reclaiming this abused and neglected piece of land, allowing natural processes to recover and flourish, therefore shaping the landscape and restoring a complete and diverse ecosystem.**

**The diversity and breathtakingly rich mosaic of different forms of life this meadow sustains is huge. It is entirely the work of nature over decades as nature has organically reclaimed this piece of land.**

**The landscape includes many ancient, veteran and mature oak trees (some with Tree Preservation Orders); an area of ancient woodland – with more than 20 majestic oak trees - affectionately known locally as “The Oak Cathedral”, the floor of which is submerged beneath a seasonal lake (a ‘Turlough’) during the wettest part of winter. Wild daffodils and stinging nettles each then take their turn to carpet the woodland floor as the seasons unfold.**

**One ancient, massive and majestic oak, in the bottom field of the meadow bordering Bedmond Lane, is believed to be more than 150 years old, and therefore known locally as “The Wellington Oak”, historically referencing “The Iron Duke”.**

**There is also a range of other established trees across the meadow (mainly field maple, hazel, sycamore, ash, elder, elm, horse chestnut and dogwood) together with a considerable number of saplings of all kinds. Several separate and expansive spinneys - formed mainly of blackthorn, bramble, wild roses and hawthorn - create the most wonderful displays of pink and white flowers and blossom followed by crops of sloes, blackberries, hips and haws.**

**Children refer to these areas as “the jungle” because twisting pathways which have been carefully cut through the undergrowth by local people have formed into tunnels as the**

spinneys have matured, enclosing the pathways with roofs - or 'crowns' - of thorns. **In addition to sloes, blackberries, hips and haws, the meadow provides a rich source of apples, cherry plums, hazel nuts, sweet chestnuts and elderberries from numerous self-seeded trees. A bountiful larder for wildlife ... and human foragers alike!**

**Tall ferns with beautiful foliage dominate some areas of the meadow and mosses, liverworts and lichen are abundant. Other bushes and shrubs - some evergreen, some deciduous - such as holly, snowberry (also known as 'coralberry') and broom, live together with a magical kingdom of fungi,** all of which thrive in the soils of this meadow and add to its rich mosaic. One highlight in the kingdom of fungi is that **morel fungi** is fruiting in the meadow and it takes years to develop the mycelium for that to happen.

**Many different forms of grass cover the meadow,** mainly Yorkshire fog but also including patches of hanging sedge and the rarer **sheep's sorrel**.

**A truly remarkable range and variety of flowers are growing wild all around the meadow with huge variations in their size** (for example the tiny **violet** compared to the towering giant-hogweed) **and in their structure, colour, form and texture.**

**Prominent amongst the glorious flora are large swathes of English bluebells, snowdrops, anemones, wild daffodils, celandine, oxeye daisies, cow parsley, rosebay willowherbs, field scabious, and bird's-foot trefoil.** There are a variety of other daffodils ('February gold', 'yellow river', and 'poets') together with **prolific displays of primroses, poppies** (including 'Californian', 'oriental' and 'opium') **wild roses, forget-me-nots, violets,** old man's beard (or 'traveller's joy'), **tansy,** wild strawberries, **chamomile,** wild basil, wild garlic, spearmint and **oregano.**

**In a meadow that's filled to overflowing,** cornflowers, crocus, marigolds, dame's rocket, **white and red clover,** ground ivy, centaurea-montana, **greater knapweed, toadflax, ragwort,** common mallow, yarrow, **red and white campion,** honeysuckle, herb Robert and various varieties of thistle, all thrive. Some prominent species are poisonous such as giant hogweed, foxglove, dog's mercury, poison hemlock and cuckoo pint (also called 'Lords-and-Ladies'). Some have enchanting names, such as **'star of Bethlehem'.** Others, less glamorously named, can also be found here such as 'stinking hellebore' and 'Patterson's curse'! This list of self-seeded flora could go on and on because **I have identified more than 250 different wildflowers and have been unable to identify at least as many again.** Those which I name

are generally well known and **all** are shown in my photographs, examples of which are shown in Appendices A to E.

**A special mention should be made of the profusion of delicate pyramidal orchids - of which there are hundreds across the meadow - together with distinctive diminutive bee orchids; and even the exceptionally rare and protected species, the lizard orchid is found here.**

**If the trees and beautiful wildflowers are stunning, the fauna that share this precious space is rich, diverse and delightful. It is home to “all creatures great and small”.**

**An impressive variety of animals all thrive in this precious space including, badgers, bats, muntjac deer (whose barking can occasionally be heard), foxes, squirrels, hedgehogs (although fewer since the badgers arrived!), rabbits, field mice, voles ... and rats! Please see my video in Appendix A.**

**Countless other wonderful creatures all call this meadow “home”. For instance, an incredibly disparate range of species of insects, especially many different varieties of butterflies, moths and bees. Using just butterflies as an example, from the early arrival of the Brimstone, a magnificent array of colourful butterflies flutter and dance around enjoying this meadow including Peacock, Red Admiral, Tortoiseshell, Painted Lady, Ringlet, Speckled Wood, Gatekeeper, Meadow Brown, Silver-washed Fritillary, Large Skipper, Common Blue and Holly Blue, Marbled White, Green Veined White, and Large and Small White.**

**Significantly, two protected species of butterfly have also been sighted, the White-letter Hairstreak and the Small Heath.**

**A large range of birds - from red kites, kestrels and owls, to robins, goldcrest, cuckoos and green woodpecker, jays and sparrows - create a melodious meadow chorus. And lots and lots - an infinite number - of invertebrates enjoy this environment. The landscape is also peppered with mounds and domes of ant hills. All join in calling this meadow “home”.**

**The meadow also welcomes many occasional visitors: pheasants and partridges** seek sanctuary from the nearby Gorhambury Estate shoot; together with herons, ducks and geese who fly in from nearby Verulamium Park to graze and enjoy the turlough in the “Oak Cathedral”. Even the **peregrine falcons** (from St Albans Cathedral) are occasionally seen scouting for food above the meadow. **Swallows**, too, are sometimes seen gracing the sky.

**As a former Asset of Community Value (ACV) it is also very special in the extent of its continuous use by many local people - and some from further afield, as the word has spread - for outdoor recreational, social, sporting and educational activities over more than five decades.**

As is mentioned in my Regulation 19 submission, following its designation as an Asset of Community Value (ACV) in 2014, **the meadow was at the vortex of a tsunami of applications and appeals from the land owner. Time after time, time and time again, legal actions and challenges have been initiated by Cala and Banner Homes Ltd ... and been resisted by SADC.**

No less than five formal applications have been made to change the use of the meadow to keep horses (or a horse). Except for the last application in 2019 (which, perversely, was granted) all were quite properly rejected by SADC (and Cala Homes took three of these to Appeal and lost each time).

In addition, and in parallel, previous owner, Banner Homes, has also **vigorously pursued four separate legal challenges, at ever higher levels of tribunal and court, contesting the continuing status of Bedmond Lane Meadow being designated as an ACV. All these challenges - including, ultimately, that heard by the Court of Appeal at the High Court in London - failed. Thus, as is clear, SADC are alert to the intrinsic ecological value of this wildflower and wildlife meadow.**

Regrettably its status as an ACV has now lapsed. The regulations for Assets of Community Value did not allow residents to submit a new application following the change of use granted in 2019.

**Extensive use and enjoyment by quite a number of people has created a network of well-worn, unofficial footpaths that criss-cross the meadow** (clearly visible on Google maps). It

**is well used by dog walkers and ramblers - and by some, just to quietly wander, relax in tranquillity and admire nature - whilst others cycle or jog through the meadow.** It attracts people from far and wide especially to see the butterflies, the prolific and rare orchids, and the range of other flowers. It is also very popular for those taking photographs and those taking young children on nature trails. Other children enjoy playing football and cricket here. **It is an inspiration and joy for many, many people.**

**People care about this meadow and it shows. Hedgerows of indigenous species have been planted by the local residents association** along the eastern border of the meadow. **Very little littering takes place** and any litter that is deposited is quickly removed by myself and others. **Dog owners are responsible and do not allow fouling.** Where informal footpaths pass through areas with high density shrubs and bushes, the vegetation is carefully trimmed by residents to keep the footpaths open.

**In conclusion, I seek to persuade you that Bedmond Lane Wildlife Meadow is a perfect example of a complete and diverse ecosystem encompassing all living organisms within a specific area and their complex interactions. This meadow supports a huge variety of life forms and in essence, it is self-sustaining where all parts are interconnected and function together to maintain life and balance.**

**Rewilding over the past three decades shows nature at its best: organically reclaiming this abused and neglected piece of land, allowing natural processes to recover and flourish, therefore shaping the landscape and restoring a complete and diverse ecosystem. Intrinsically, it is nature's preservation of nature.**

**The biodiversity and breathtakingly rich mosaic of different forms of life this meadow sustains is unbelievably spectacular. It is breathtaking and needs to be seen to be believed. And its value to the environment is immense.**

**I have sought to show that the much vaunted Arup Review - Stage 2 Green Belt Review 2023 (GB 02.02) - has fundamental weaknesses: conspicuous lacunae.**

**The loss of the invaluable Bedmond Lane Wildlife Meadow is an exemplar of the failure to use biodiversity value as a reason to include or to exclude sites. In this respect, I submit both ARUP and SADC are guilty of all words and no action.**

**I trust that the weight of evidence I have put forward is compelling. To lose this wildlife meadow would be a travesty: neither fair, nor just, nor right. Yet that is what is proposed by the fundamentally flawed methodology.**

**Finally, I should draw your attention to a particularly relevant statistic: the Open University states *“The UK has lost a staggering 97 percent of its wildflower meadows in less than 100 years.”***

**Part 2. A description of Bedmond Lane Wildlife Meadow: In pictures (with photographic and video evidence).**

**I believe a wildlife meadow is akin to a Master Landscape Painting that is actually painted with living things. St Albans has only one such meadow - the Bedmond Lane Wildflower and Wildlife Meadow.**

**It is said that a picture is worth a thousand words and the photographs in Appendices B to E, (together with the short video in Appendix A) help bring this meadow to life and show the natural beauty of this precious space. It needs to be seen to be believed.**

**I have taken many thousands of photographs during the 52 years that I have enjoyed all the changing and charming rhythms of the seasons in Bedmond Lane Wildlife Meadow, from the serene hoar frost and snow-covered meadowland in winter through to the spring-time abundance of fresh and majestic new life ... and on into mid-summer's vibrance of grand floral blooms ... finally, reaching a crescendo of spectacular blazing colours in autumn. I am also fortunate to have relished the many different day-time personalities of the meadow, from early morning mists to beautiful - and sometimes spectacular - sunsets. I have an extensive library of photographs depicting these changing and charming rhythms and personalities.**

**Those shown in Appendices B - E provide only an overview, with all the limitations this implies. Nevertheless, I hope they bring you some enjoyment ... as well as reinforcing the strength of the case for preserving this magnificent meadow.**

**I gave evidence in the High Court at the Royal Courts of Justice in 2015 successfully defending the status of the meadow as an ACV. Photographs I produced as exhibits - and which were accepted unchallenged by the court - can be found by reference to the 437 digital photographs of the meadow shown at the link <https://www.flickr.com/photos/127244210@N04/sets/72157646891386472/> in the album "Meadow Photos". Also using this link, "Court Meadow Photos" depicts highlights of the vistas, wildflowers and wildlife in Bedmond Lane Wildlife Meadow between 2011 and 2014.**

**Dr Robert Wareing.**

23 September, 2025.