

Joint Examination of the Welwyn Hatfield Local Plan 2013-32 (WHLP) and the East Herts District Plan 2011-33 (EHDP)

Birchall Garden Suburb (BGS)/East of Welwyn Garden City (EWEL1)

**Statement by Dr Jonathan Fisher (Freelance Environmental economist)
& Dr Barrie Goldsmith (Ecologist and SUSTRANS Ranger)**

On behalf of the Central Hertfordshire Green Corridor Group:

This statement provides evidence on the following matter raised by the Inspectors:

Matter 5: Other Environmental Considerations: Water; Noise and Air Quality

It accompanies our statements on the following other matters

Matter 1: Green Belt

Matter 2: Green Corridor

Matter 3: Ecology

Matter 6: Sustainable location and movement

Matter 10: Waste

Matter 11: Implementation

Matter 5 – Other Environmental Considerations: Water

Strategic Flood Risk Assessment (FRA)

We welcome and support the Inspectors' statement from paragraph 100 of the NPPF that Local Plans should be supported by a Strategic Flood Risk Assessment (FRA). The Environment Agency's letter to WHBC (see Appendix B) specify particular considerations that need to be covered in any such FRA.

21) Is the development of this site supported by a positive Strategic Flood Risk Assessment?

23) Have the ramifications of this proposed development for flooding at locations downstream been examined? If so are all of the issues raised likely to be capable of remediation such that flood risk will not be increased elsewhere?

24) Has the ability of this site to be drained through a Sustainable Urban Drainage Scheme been fully assessed?

The answer to issues 21, 23 and 24 is No. An adequate positive Strategic Flood Risk Assessment has not been prepared in line with the Environment Agency's requirements. Likewise the developer has failed to incorporate findings of any such assessment into the proposed development with necessary remediation – as set out in their letter to WHBC (reproduced as Appendix B). WHBC's Flood Risk and sequential test document and Appendix are thin and do not adequately assess flood risks **downstream** and do not provide sufficient supporting evidence to justify their conclusions. WHBC and EHDC's Sustainability Appraisal fail to assess adequately the impacts of the development downstream of the site.

Moreover, the Wardell report for GCE rightly raises concerns about the adverse implications of contaminants from the former landfill sites for the suitability of Sustainable Urban Drainage Systems (SUDS) to control increased flood risks arising from the development (see p. 18, 22/23, 27 of the Wardell report). This raises further doubts about how adequately

have Tarmac assessed this important subject as well as the adequacy of WHBC and EHDC's consideration of this matter in proposing to include it in their Local Plans.

Water courses (Rivers Mimram and Upper Lea)

We welcome the Inspectors' statement that the river Mimram and the upper Lea are chalk streams of importance as a result of their special ecology, which we highlight in our report (see Appendix A). The Mimram is a significant chalk stream of regional (it not national) importance and a priority habitat under the EU Habitats Directive. Any impacts of the proposed development that could deteriorate this river and the River Lea would therefore be particularly significant and would require special attention by the Environment Agency in implementing the Water Framework Directive and preparing the River Basin Management Plan for this catchment.

25) Has there been any research into the likely leaching of contaminants from the historically tipped areas into ground water and the local watercourses?

26) If so what are the results? Can a permanently safe environment for the human population and local wildlife be guaranteed?

27) Can this development be implemented without major upgrades to the trunk sewage network and/or the sewage treatment facilities?

Therefore we welcome the Inspectors raising the above questions which should be properly addressed before the proposed development could in any way be considered appropriate for inclusion in the Local Plans.

We have not seen evidence of these matters being adequately assessed. The answers to all these questions is therefore No.

Matter 5: Noise and Air Quality

29) Has there been an assessment of noise and atmospheric pollution levels along the northern side of the A414?

No. We have not seen any assessments of these matters at this point.

We support the concerns expressed by Hertingfordbury Parish Council regarding this matter and Barrie Goldsmith regarding Matter 6 that the proposed development would be likely to cause a significant increase in traffic along the A414.

We are particularly concerned about the impacts of such increased traffic on noise and air pollution levels especially at Mill Green museum, which could form an important focal point for the Green Corridor. In addition, the increased traffic could exacerbate the current safety risks of cars occasionally coming off the road and going through the inadequate barrier onto the road outside Mill Green Museum, where school children often congregate to be picked up after visiting the Mill. Such impacts would require urgent remediation by HCC (eg use of quiet tarmac, installation of proper safety barriers).