

Louise St John Howe
Programme Officer
PO Services
PO Box 10965
Sudbury
Suffolk
CO10 3BF

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L01

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Email: louise@poservices.co.uk

Dear Louise

Stage 3 Green Belt Review – Welwyn Hatfield Local Plan

Thank you for consulting us on the Stage 3 Green Belt Review of the Welwyn Hatfield Local Plan.

We have reviewed the following documents.

- EX88A – note to accompany Welwyn Hatfield Green Belt Study Stage 3
- EX88B – Welwyn Hatfield Green Belt Study Stage 3 Main Report
- EX88C – Welwyn Hatfield Green Belt Study Stage 3 Figures
- EX88D - Welwyn Hatfield Green Belt Study Stage 3 Appendices

We do not consider that the stage 3 study provides a sound basis on which to make an informed judgement on different development strategies.

Our reasons for this are given below.

The study excludes flood zone 2 and 3 as absolute constraints to development. This is contrary to the advice given by the Planning Inspector in their comments from Stage 2 Hearing Session October 2017 where the Inspector explains the context the study should be carried out in. The Inspector states -

“ Essential areas to be otherwise retained

There are of course sites, which for other purposes are unlikely to ever be developed. I would include the statutory conservation sites, land potentially at risk of flooding, and the major heritage assets in this category but the final choice should be a rational value judgement on the importance of the protection.”

Flood zone 2 and 3 are not treated as absolute constraints within the Stage 3 Green Belt study. The justification given for this is that it is consistent with the Council's Housing and Economic Land Availability Assessment (HELAA, 2016). However we don't think it is consistent with the approach taken in the HELAA which screens out high flood risk areas.



The National Planning Policy Framework (NPPF) stresses the importance of the role in Planning in reducing and managing flood risk and sets strict tests to protect people and property from flooding which all local planning authorities are expected to follow. Where these tests are not met, national policy is clear that new development should not be allowed. The NPPF states

“ In plan-making, local planning authorities apply a [sequential approach](#) to site selection so that development is, as far as reasonably possible, located where the risk of flooding (from all sources) is lowest, taking account of climate change and the vulnerability of future uses to flood risk. In plan-making this involves applying the [‘Sequential Test’ to Local Plans](#) and, if needed, the [‘Exception Test’ to Local Plans](#). ”

Paragraph: 001 Reference ID: 7-001-20140306

It also describes the sequential approach which must be taken with respect to Local Plans

“ What is the sequential, risk-based approach to the location of development?”

This general approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. The aim should be to keep development out of medium and high flood risk areas (Flood Zones 2 and 3) and other areas affected by other sources of flooding where possible.

Application of the sequential approach in the plan-making process, in particular application of the Sequential Test, will help ensure that development can be safely and sustainably delivered and developers do not waste their time promoting proposals which are inappropriate on flood risk grounds. According to the information available, other forms of flooding should be treated consistently with river flooding in mapping probability and assessing vulnerability to apply the sequential approach across all flood zones.”

Paragraph: 018 Reference ID: 7-018-20140306

This is of particular relevance to residential dwellings which are classified as ‘more vulnerable’ according to the NPPF and therefore incompatible within flood zone 3b and subject to the sequential and exceptions tests in flood zone 3a ([see Table 3](#)).

The NPPF explains how the sequential approach should be applied in plan-making and from this we infer that evidence base documents should also follow that approach.

In addition to the national policy stance there are clear practical reasons why value should be afforded to the protection of flood zones.

For example:

- To provide space for climate change adaptation and reduce vulnerability to climate change impacts
- Retaining flood risk storage and drainage attenuation
- Preventing further additional costs of strategic, site level and property level flood defence, resilience, resistance measures.

- To protect people from flooding and its effects.
- Alleviating further resource burdens being placed on emergency planners, emergency services.

Please let me know if you have any questions.

Yours sincerely

Deborah Simons
Planning Advisor

e-mail HNL SustainablePlaces@environment-agency.gov.uk