

**Director of Environment  
& Infrastructure: Mark Kemp**



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**Date:** 4 November 2019

Dear Ms St John Howe

**Welwyn Hatfield Local Plan Examination – consultation on additional documents submitted to the Examination**

Thank you for the opportunity to comment on the additional documents EX154-EX160B submitted to the Welwyn Hatfield Local Plan Examination since 20 July 2019.

The county council has the following comments to make:

**Document EX157 – Birchall Garden Suburb: Cole Jarman Noise Assessment Report submitted by Tarmac, August 2019**

The county council as Waste Planning Authority welcomes the reference to the agent of change within the Birchall Garden Suburb Noise Assessment as this supports the existing waste uses adjacent to the site. It should be noted that this waste site is in fact two parcels of land upon which waste activities operate (namely Peter Brothers and BP Mitchell).

Whilst there is considered to be appropriate wording within the noise assessment, this does not negate the need for an Environmental Impact Assessment to support any planning application submitted. In addition, an appropriate tool forming a Health Impact Assessment would also be required to demonstrate the potential effects on health including noise, dust etc.

The Waste Planning Authority wishes to be engaged throughout the planning application stages for the development at Birchall Garden Suburb.

**Document EX156 – Landscape Sensitivity Assessment, July 2019**

On reviewing the document, the county council notes that the areas consistent with the Lea river corridor (33a, 45a, 65, 65a) are assessed as being of low – moderate sensitivity.

There is concern for this assessment, which appears too low and could be considered to be high sensitivity. The river corridor represents a key Green Infrastructure (GI) asset as confirmed within the Hertfordshire and Welwyn and Hatfield Borough Council Green Infrastructure Plans (2011). (It also represents a key strategic gap between Welwyn Garden City and Hatfield; however this is picked up within the Green Gap Assessment).

With regards to GI assets, industry good practice guidance ‘An approach to landscape sensitivity assessment – to inform spatial planning and land management’ Natural England, June 2019 states that:

*“The valuation of ecosystem services (provisioning, regulatory, habitat and supporting services, and cultural services), for example as provided by green infrastructure, might also inform value and thus landscape sensitivity.”*

However, the submitted document does not appear to include criteria to take account of ecosystem services. It is therefore suggested that this needs to be clearly stated as a limitation of the document, and clearly stated that GI assets and functions will need to be taken into account.

Please do not hesitate to contact me should you need any clarification in relation to this response.

Yours sincerely

Trish Lyons

Senior Planning Officer, Growth & Infrastructure Unit