

23/00806/SCOP | Scoping Opinion: Residential development of up to 650 homes, access road, up to 500sqm retail, food and beverage and medical and social floorspace, up to 4ha of non Green Belt land to make provision for a 2FE primary and possible 4FE secondary school, parking infrastructure and associated works. | Ga2 Land Off Great Ashby Way Great Ashby Stevenage Hertfordshire

Dear Naomi,

Thank you for consulting with the Great Ashby Community Council (GACC) on the above Scoping Opinion.

GACC consider that the proposed GA2 development will have a significant impact on the local environment and on the existing population of Great Ashby.

The Proposed Development Site

Section 2.1 of the EIA Scoping document states that the site shown in Figure 1.1 *'extends to approximately 53.5 hectares.'* GACC believes this measurement is incorrect and estimates the area shown in Figure 1.1 to be in the region of 70 hectares. The site shown in Figure 1.1 is considerably larger than the site allocated in the NHDC Local Plan 2011-2031 and this Council seeks assurance from North Herts Council that this additional land, which is not an approved site allocated for development within the Local Plan, will remain undeveloped and be retained as Green Belt land.

GACC would like to point out that Section 2.3 of the EIA Scoping document does not reference the Landscape Character Area 39 Middle Beane Valley, which covers a significant part of the site.

Ecology

The Scoping report states that the study area covers the whole site, and again states a site area of circa 53.5 hectares of land. It is not clear if the scope of the study is based on the site shown within the NHDC Local Plan or the larger area outlined in the Scoping document.

Agricultural Land & Climate Change

The proposed site is currently used for agricultural purposes and has been farmed using regenerative ecological farming techniques which seek to protect and enhance the environment. This promotes increased biodiversity, improves habitats, improves water quality, improves air quality and improves natural flood management.

The loss of this good quality agricultural land is detrimental to food production and to our local environment. Good quality soil is recognised by DEFRA as a valuable resource in its own right, for food production, water management, to support biodiversity and ecosystems, and in the combat of climate change. With three times the amount of carbon held in soil compared to the atmosphere, eco-farmed land is contributing to the offset of climate change through the storage of carbon.

GACC would request that Agriculture and Climate Change are scoped into the EIA to enable suitable analysis of the impact of the proposed development in these regards.

Ancient Woodland & Local Wildlife Sites

The Scoping document refers to the ancient woodlands which are adjacent to the site. GACC would like to add that all of the wooded areas adjacent to and also within the proposed development site including Brooches Wood at the proposed entry point to the development site, and Nine Acre Spring and Longdell Wood within the site, are habitats of Principal Importance NERC 2006 S41 and are significant sites for biodiversity conservation, containing protected species of importance.

There is concern that development close to the ancient woodlands and these other environmentally significant sites will cause irreparable damage to these habitats. Pollution from the development and changes in the natural flow of the water course are significant factors to consider for these habitats. GACC requests that this topic is specifically scoped into the EIA in relation to the woodland habitats within and surrounding the site.

Natural Resources & Ground Conditions and Contamination

The Scoping document highlights that the proposed development overlies a principal aquifer.

With an estimated 85% of the world's chalk streams in England and the fact that most of the water we drink comes from rainwater stored underground in chalk aquifers, further detailed assessment of this natural resource would seem appropriate.

GACC understands that this area of land should drain naturally through the chalk to local streams, which feed into the River Beane. The River Beane and the chalk streams locally are in a poor condition with poor flow. It is unclear to GACC whether this site can be fully or partially restored to support the chalk stream, either with or without the proposed development, or what the consequences of significantly altering the topology of the land might be.

The local Catchment Based Approach Group manages the restoration of this water body. The Government target is for 75% of chalk streams to get to their natural state as part of its 25 Year Environmental Plan.

GACC would ask NHC to consider whether this nationally important environmental topic, which is described as protecting 'England's Rainforests', should be considered within the scope of the EIA.

Socio-economics

Section 5.12 of the Scoping document refers to the proposed site benefitting from '*a range of social infrastructure within Great Ashby. This includes nursery schools, primary and secondary schools, health cares, places of worship, sports facilities and community centres.*'

This Council would like to highlight that this is woefully incorrect: Great Ashby has no secondary school; no healthcare provision i.e. no GP surgery and no dentist; no library; and no sports facilities. It is hoped that this lack of basic local infrastructure would be corrected should the proposed development proceed in order to benefit existing residents within Great Ashby as well as within the new development.

Additionally, the Community Council has a statutory obligation to provide allotments as required by the electorate; a location previously outlined beneath pylons near Mendip Way is deemed unsuitable due to the inability to store items onsite, the lack of water to the site, the difficulties with parking and the proposed new developments which will pass the area. This Council requests NHC consider whether provision of a site for allotments within the GA2 site is feasible, should this development proceed.

With regards to open green space, existing Great Ashby residents utilise a park and grassed area beneath the pylons which will be lost should an entrance to the proposed new development be created via Mendip Way. It is hoped that this loss of amenity would be recognised and compensated for.

Great Ashby residents and visitors to the area utilise the public footpaths and bridleway within this location for recreation and exercise which promotes a healthy lifestyle. This network of intersecting pathways directly link to the surrounding villages and the District Park and any loss of the ability to access open countryside from Great Ashby during the development phase would be detrimental to the health and wellbeing of our community.

Transport

The Great Ashby area already suffers from congestion with traffic leaving or entering the area during peak hours including at school drop off and pick up times. This whole area is served by an inadequate road network.

The cumulative effect of new developments, either proposed or already approved, including GA2, Roundwood/GA1 and North of Stevenage will all detrimentally affect the volume and flow of traffic within Great Ashby.

The Transport Assessment suggested is wholly inadequate. In addition to prospective residents' vehicles, this area will also see an increase in traffic from the GA1 site. This will be compounded by traffic to and from new amenities on the site. The proposed location of a 2FE Primary and 4FE Secondary school will inevitably generate substantial traffic through Great Ashby. This amounts to a figure in the region of 1000 pupils plus staff attending/leaving the site daily. Due to the location, a significant number would likely be dropped off and picked up from the site by car, accessing the site via Mendip Way.

This Council would like to request a more thorough and complete transport survey of Great Ashby together with full modelling to incorporate the potential effects of **all** proposed or approved developments in the area. This would ensure that the transport network is safe, sustainable and fit for purpose for all road users.

At a minimum, this Council would ask for measures to be put in place to improve the existing infrastructure for safe sustainable transport, including crossings to allow pedestrians to transverse Great Ashby Way at key location points prior to any development on the grounds of public safety.

Waste

GACC can see no reference to the environmental problem of the treatment of generated wastewater and sewage. GACC understands that the current infrastructure within Great Ashby is under pressure and this will need to be addressed. Thames Water does not appear to be a consultee, but the discharge of waste is an environmentally sensitive issue and it is hoped this will be scoped into the EIA.

Heritage Sites

The NHC Local Plan states that:

'4.249 The site adjoins a number of Grade II listed buildings at Tile Kiln Farm and care should be taken in the detailed design of any scheme to ensure this area retains an appropriate setting.'

The impact on this heritage asset is likely to be significant. It currently commands a rural site overlooking rolling open countryside. The proposed GA2 site boundary extends around the site and this asset will be subject to vibration, dust, and pollution. It is difficult to visualise how it is possible to retain an appropriate setting when a previously open site will be enclosed, and for this reason, GACC is of the view that the listed buildings at Tile Kiln Farm should be scoped into the EIA.

GACC would like to thank you again for providing the opportunity to contribute to the early planning process.

Kind regards,

Great Ashby Community Council