



www.north-herts.gov.uk

Ms M Ryan
Iceni Projects Ltd
Da Vinci House
44 Saffron Hill
London
ECN1 8FH

Our Ref : 23/00806/SCOP

Contact : Naomi Reynard
Direct Line : 01462 474318
Email : naomi.reynard@north-herts.gov.uk
Date : 22nd June 2023

Dear Ms Ryan,

Town and Country Planning (Environmental Impact Assessment) Regulations 2017 – Formal EIA Scoping Opinion of North Hertfordshire Council as Local Planning Authority

Development Proposal: 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.

Site: GA2, Land off Great Ashby Way, Great Ashby, Stevenage, Herts

I refer to your submission of an Environmental Impact Assessment (EIA) scoping report in relation to the proposed development at GA2, Land off Great Ashby Way, Stevenage (within North Hertfordshire District), received by the Local Planning Authority on 6th April 2023.

This scoping opinion will provide a brief description of the site and the proposed development followed by the Council's 'Scoping Opinion' incorporating representations and the opinion of officers.

The Site

The site is approx. 72.10 hectares in size and is located to the north of Great Ashby, Stevenage, within the district of North Hertfordshire and in the parish of Weston. It is noted that in the EIA Scoping Report it states that the site is approx. 53.5 hectares, which is not correct. The site comprises of arable fields and areas of woodland. Part of the site is allocated as site GA2 under Policy SP18 of the North Herts Local Plan 2011-2031 as a Strategic Housing Site for a new neighbourhood of approximately 600 homes and supporting infrastructure.

The GA2 allocation on the Local Plan proposals map is 52.9 Ha. Which would suggest that the site area given in the Scoping Report is the site area of the allocated site, rather than the site area of the area within the red line on the site location plan submitted with the Scoping Report. Please can this be corrected in the Environmental Statement.

North Herts Council, PO Box 10613, Nottingham, NG6 6DW

The site is located to the north-east of the Great Ashby housing estate. Immediately to the north, east and south-east of the site is agricultural land. To the south-west of the site is Tilekiln Wood. Tile Kiln Farm is located to the north-west of the site and Dane End is to the north-east of the site. Brooches Wood is to the south of the site

There are two areas within the red line of the site on the location plan submitted within this request for a scoping opinion, which are not within the Local Plan housing allocation site. These areas are to the north-east and the south-east of the site. If any land outside of the allocation site is included in the red line of the application site, then any development thereof will need to accord with Green Belt policies. As a note, we would expect the allocation site to accommodate all open, green, play and SUDs requirements within its boundary in a cohesive and well-planned manner without sprawl into the Green Belt. Great Ashby Community Council, Graveley Parish Council and Weston Parish Council have all referred to the site area in their comments.

The Proposal

The Scoping Report states that the proposal is likely to include: Up to 650 market and affordable homes, construction and the principle access road from Mendip Way, up to 500 sqm 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 and suitable parking infrastructure.

The principal access to the site is to be provided via Mendip Way. Heights and massing have not been finalised, but are anticipated that they could come forward within a range between ground plus up to 4 storeys and a maximum height of up to 19m to the ridge.

It is noted that the proposal is likely to include up to 650 dwellings. The dwelling estimate in Local Plan Policy SP18 is approximately 600 homes. If more than 600 homes are proposed, then justification for this would need to be provided as part of the planning application. Graveley Parish Council referred to the proposed housing numbers in their comments.

A wide range of consultation responses have been received and these are all attached to and are referred to within this Scoping response. Although some consultees have not yet responded, any further responses received by the LPA after this formal scoping opinion letter will be forwarded to you in due course.

The Council's Scoping Opinion

The Local Planning Authority has considered the information submitted with the scoping request, specifically the suggested topic areas/chapters to be 'scoped in' in the Environmental Statement (ES) and listed below:

- Socio-economics
- Air quality
- Transport
- Noise and vibration
- Ecology
- Landscape and visual impact
- Water environment and flood risk

- Archaeology
- Cumulative effects

The Local Planning Authority is in broad agreement with the proposed content. However, additional chapters/topic areas are required in the Environmental Statement, and further chapters are required to be 'scoped in', as opposed to being 'scoped out' in the applicants scoping request as follows:

Additional chapters to be 'scoped in':

- Built Heritage
- Waste
- Human Health
- Climate Change
- Soils and Agricultural Land

Additional chapter to be 'scoped in' not present in the applicants scoping request:

- Utilities, services and infrastructure

I will break down our formal scoping opinion in order of first covering/discussing 'Alternatives', I will then go through topics to be addressed in the Environmental Statement (those topics already proposed to be included), then topics to be 'Scoped In' (topics mentioned above which we would like to see added) and finally I will go through those topics which are proposed to be 'Scoped Out' of the Environmental Statement (ES).

Alternatives

The EIA Regulations require that the Environmental Statement includes an outline of the alternatives to the proposed development site and indicate the reasons for progressing the alternative chosen taking into account the environmental effects. Paragraph 2 of Schedule 4 of the EIA Regulations requires the applicant to include in their Environmental Statement a description of the reasonable alternatives studied (for example in terms of development design, technology, location, size and scale) and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

It is noted that the Scoping Report states that the Environmental Statement will describe the reasonable alternatives including the 'do-nothing' scenario and alternative designs. However, the Council is of the view that this chapter would need to consider all reasonable alternatives, including different sites and/or only the partial development of the site (for example development of just one half of the site).

It is of course acknowledged that much of the site is allocated as site GA2 under Policy SP18 of the North Herts Local Plan 2011-2031 as a Strategic Housing Site for a new neighbourhood of approximately 600 homes. However, the Environmental Statement would need to make a robust argument as to why the site was chosen and taken forward as part of the Local Plan. For example, you may wish to provide comment on how the site has formed part of a wider and through search for sites and subsequent consultation process undertaken by the Council as part of the Local Plan process following a strict regulatory approach.

Environmental Topics to be addressed within the Environmental Statement

I have listed these in the order they appear in the Scoping Report.

Socio-economics

The Council agree that the Environmental Statement needs to include a socio-economic chapter.

I would also outline that the following information/data and following matters will need to be assessed as part of the Environmental Statement:

Population - a quantitative estimate of the resulting population of the development.

Education - A detailed assessment of the capacity of the relevant schools (to be agreed with the LEA) and the ability of the schools to accommodate pupils from the proposed development. This assessment must include the likely child yield and impact on nursery and pre-school provision, childcare (outside school hours for 0-14 year olds) primary and secondary education. This needs to include adequate quantitative baseline information. The temporary measures to be put in place in advance of the opening of the schools and a demonstration of how this could be achieved. The size of the new schools and when they will be open needs to be justified in relation to a justified projected pupil yield.

Health – A detailed quantitative analysis of the baseline health provision and the impact of the development is required in relation to location of facilities and patient list sizes.

Open Space – It is noted that the Environmental Statement will consider the effect of the proposed development on the provision of social infrastructure including open space. Please see the comments from the Council's Service Manager, Greenspace, regarding impact on existing greenspace and play areas and the comments from Sport England.

Other social infrastructure – It is noted that the Environmental Statement will consider the effect of the proposed development on the social infrastructure in Great Ashby including places of worship, sports facilities and community centre and this will need to include an assessment of the impact on the existing Great Ashby Community Centre.

The above is not a complete list and this section of the Environmental Statement would need to consider the impact on all community and public services and facilities. In this regard, I would also refer you to the Council's Infrastructure Delivery Plan 2011-2031 (September 2016) (IDP).

When considering the receptors listed in Table 5.1 of the Scoping Report it will also be necessary to consider the impact on neighbouring parishes and wards in the Stevenage area, given the close relationship that the development may have with regards to services for residents in these areas. It is noted that socio-economic study area in Figure 5.1 does not include any of East Hertfordshire. Given the site is very close to the boundary with East Herts it may be advisable to expand the socio-economic study area to include some of the East Herts area, particularly nearby settlements / parishes (e.g. Aston & Walkern).

Herts County Council Public Health have responded directly to the consultation on this request for a scoping opinion. They also sent a further letter to the Growth and Infrastructure Team, Herts County Council. Both are attached. I would also direct you to the comments made by the Senior Planning Officer, Growth and Infrastructure Unit, Herts County Council with regards to Public Health and HIA proposals. In particular, the comments as follows:

“Although, it is positive to see the developer has proposed to prepare a standalone Health Impact Assessment (HIA), it is not clear why the topic of Human Health was scoped out while the reasons given to justify it cited future residents’ habits and the way the development’s buildings and spaces are used (rather than constructed). This gives certain degree of inconsistency to the developer’s approach to this topic.

Urban and housing design has intimate connections to health. Poor design choices can worsen health, with underlying issues of inequality a driving factor. Where we live, and the design of our living spaces have a significant impact on health. The built environment exerts one of the strongest directly measurable effects on physical and mental health.”

Based on the comments received, the Council’s view is that Human Health should be scoped into the Environmental Statement.

I wish to flag up the response from the Housing Supply Officer which sets out the requirements for affordable housing. Please also refer to the response from the Crime Prevention Design Advisor, Herts Constabulary and the response from Sport England. Natural England were consulted and provided a response. Annex A to this letter provides Natural England’s advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development, including connecting people with nature. I would also draw your attention to the comments made by Great Ashby Community Council with regards to socio-economics.

Air Quality

It is agreed that Air Quality should be scoped into the Environmental Statement. Given the distances involved, it is generally agreed that the proposed development would not be likely to have any significant impacts on the nearest Air Quality Management Areas. As such, whilst the Environmental Statement would need to include a chapter on Air Quality impacts (both during construction and operational phases), this would not need to include any in depth analysis with regard to the AQMA.

The methodology as outlined in section 6.16 of the Scoping Report is noted. However, I refer you to the comments of the Council’s Environmental Protection Officer (Air Quality), who raises some specific requirements. You may wish to contact the Environmental Protection Officer for their input and advice in terms of finalising methodology and/or identifying receptors etc. The outline proposals meet the criteria for a MAJOR development. A transport assessment and air quality assessment will be required, and a Construction Management plan. The development will also require mitigation measures, including installation of an agreed number of EV charge points, and a Travel Plan as detailed under section 2.4.2 of the NHDC Air Quality Planning Guidance document. The requirements for major scale developments are detailed within section 2.4.3 of the Guidance document.

Natural England were consulted and provided a response. Annex A to this letter provides Natural England’s advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development, including air quality.

Transport

The Council agrees that the Environmental Statement will need to include a chapter on transport matters. The Environmental Statement will need to consider and set out the impacts on both the local highway network in and around Great Ashby, the surrounding villages and also, on the wider road network.

An assessment of the cycle and pedestrian access to the site and the wider area will be a key part of the Methodology when looking at sustainable transport alternatives. Potential connections into existing networks (off road) should also be scoped into the assessment.

I refer you to the comments made by Highways, Herts County Council. In order that all matters can be assessed under one cohesive document, the Transport Assessment and Travel Plan should be attached with the Environmental Statement as appendices (which are referred to and summarised as part of the relevant chapter in the Environmental Statement).

I would also draw your attention to Stevenage Borough Council's adoption of a mobility strategy to seek to reduce reliance on the private car and to encourage more active and integrated communities.

The Senior Planning Officer, Growth and Infrastructure Team, Herts County Council, has noted that section 7 contains no reference to equestrians. The report should contain positive representation of the needs of equestrians, whether existing or as a result of, the development both within and off site as part of the Active Travel piece. In this regard I also draw your attention to the consultation response from the British Horse Society, which submitted a letter to draw our attention to an application that has been made for Dovehouse Lane (which passes between Walkern to Dane End Farm) to be placed on the Definitive Map of Hertfordshire as Restricted Byway status, which passes through the proposed development area.

Please note that Active Travel England became statutory consultees in the planning system for certain developments (including developments for 150 residential units or more) on 1st June 2023. We did not consult them on this request for a scoping opinion as it was received before this date, but you may wish to contact them direct for their views on the Scoping Report.

I would also draw your attention to the comments made by Great Ashby Community Council with regards to transport and to the comments made by Graveley Parish Council regarding site access and traffic survey and the comments made by Weston Parish Council in relation to site access, transport and trip generation.

Noise and Vibration

The Council agrees that a chapter would need to be included as part of the Environmental Statement which sets out the environmental impacts in terms of noise. I have attached the comments from the Environmental Health Officer. This sets out the noise assessments which will be required to be incorporated into the Environmental Statement. Please also note her comment in relation to external lighting. I would advise that 'Lighting' be added to the chapter heading and this matter covered in the Environmental Statement.

Ecology

It is agreed that a chapter covering matters of Biodiversity and Ecology will need to be included as part of the Environmental Statement, particularly given the local wildlife sites at Tilekiln Wood, Parsonsgreen Wood, New Spring Wood, Brooches Wood and Claypithills Spring Wood.

Natural England were consulted and provided a response. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development, including Environmental data and Biodiversity and Geodiversity.

Hertfordshire Ecology have been consulted, but at the time of writing this letter their comments have not been received. I will forward the comments from Herts Ecology when received. Herts Middx Wildlife Trust were also consulted, but late in the process, so I will also forward their comments when received.

There are inconsistencies in the submitted report in relation to the identification of Sites of Special Scientific Interest (SSSIs). In particular between Tables 4.1 and 6.1, which both identify Knebworth Woods and Sherrardspark Wood SSSIs as receptors, and the written description in paragraph 2.10 which identifies Benington High Wood and Moor Wood SSSIs. This latter pair of SSSIs are closer to the site. This needs to be resolved though it is noted that DEFRA's 'MAGIC' map website suggests that the application site lies outside of the SSSI impact zones for the proposed form of development for all four SSSI sites.

Landscape and Visual Impact

I am unable to provide detailed technical comments on this aspect, as we do not have an in-house Landscape specialist in the Planning Team. On a development of this scale, we may well seek specialist Landscape advice on a planning application with Environmental Statement.

Clearly for a development of this scale, a chapter is required which will assess the environmental effects of the development in terms of Landscape and Visual Impact.

A key to this will be the identification of location receptors around the site, regarding views into the site from the surrounding landscape. The list of landscape and visual receptors provided in Table 10.1 is noted. In addition, views out of the site would also need to be considered, particularly important views towards heritage assets which would need to be retained and/or enhanced. With regards to the key views listed in paragraph 10.35 where you will include three photomontages, we would suggest that an additional photomontage be provided from the viewpoint from the corner of Warrens Green Lane (included in the LVIA Appendix 5 as viewpoint 3), as it is presently an open view into / across the site.

The assessment would need to identify the maximum height of buildings and should give an indication of where the tallest, most prominent buildings are likely to be located within the site, so that a proper assessment can be made on the impact on the wider area.

An indicative layout is required to demonstrate how the different elements of open space/green infrastructure can be accommodated within the site. A rationale for how much green space and its layout/provision would also need to be provided (including an indication of which standards have been assumed). Furthermore, cross-sections are likely to be

required to illustrate how the proposed layout would work with existing site features and landform.

Paragraph (g) of Policy SP18 requires: ***“Structural planting along site boundaries as informed by detailed landscape assessments to reinforce the revised Green Belt boundary and mitigate landscape impacts.”*** Therefore, it is important that the landscape assessments in the Environmental Statement inform this element of the proposals.

Natural England were consulted and provided a response. Annex A to this letter provides Natural England’s advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development, including landscape and visual impacts.

The comments from Great Ashby Community Council have pointed 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. I assume this is just an error as it is covered in paragraph 10.19.

Water Environment and Flood Risk

It is agreed that it is necessary for the Environmental Statement to include a chapter which would fully consider and assess the impact of the development proposal on matters of hydrology and flooding.

A surface water drainage assessment should be carried out and the submission of both a Flood Risk Assessment and a Sustainable Drainage Strategy would be suitable in this instance. These should be appended to the Environmental Statement. I would refer you to the consultation response received from the Lead Local Flood Authority, Herts County Council. It is recommended that the content of the Environmental Statement in relation to these matters responds to all the recommendations and requests as outlined by the LLFA. Please note that the site is in the Environment Agency Source Protection Zone III – Total Catchment and in Drinking Water Safeguard Zones for surface water.

The Environment Agency were consulted on the application and provided a response. Based on the information currently available, the development raises no environmental concerns for them. They therefore have no comments on the scope of the Environmental Statement; however, they offered advice in relation to use of Sustainable Drainage Systems and water resources in the attached response.

Thames Water, Affinity Water and Anglian Water were consulted. A response was received from Thames Water. Please can the following issues be considered and covered in the Environmental Statement: 1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met 2. The surface water drainage requirements and flood risk of the development both on and off site and can it be met. 3. Build - out/ phasing details to ensure infrastructure can be delivered ahead of occupation. 4. Any piling methodology and will it adversely affect neighbouring utility services.

Natural England were consulted and provided a response. Annex A to this letter provides Natural England’s advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development, including water quality.

I also refer you to the comments from Great Ashby Community Council in relation to ‘Waste’, ‘Natural Resources’ and ‘Ground Conditions and Contamination’ and from Weston Parish

Council in relation to 'Waste' (specifically foul water). Thames Water have now been consulted and they provided a response referred to above.

Archaeology

The Council is in agreement that archaeology is scoped into the EIA, as the impact that such a large development on as yet undiscovered (non-designated) heritage assets of archaeological interest is potentially very extensive.

I refer you to the comments provided again by Historic England and also by the Herts County Council Senior Historic Environment Advisor. Essentially it is agreed and advised that the Environmental Statement should include the results of a comprehensive assessment and evaluation (comprising desk-based assessment, geophysical survey and trial-trenched evaluation) which would be required to establish the potential for, and the significance of, buried archaeological remains across all areas of the development. The comments from the Herts County Council Senior Historic Environment Advisor set out specifically the reports required.

Any associated, supportive documents submitted with the application should be included with and appended to the Environmental Statement.

Cumulative effects

In the Council's view it is also necessary for the Environmental Statement to consider the cumulative effects of this proposal combined with other major proposed developments in the surrounding area, and it is noted that a chapter on this is proposed as part of your Scoping Report. Cumulative effects could either be considered as part of a separate chapter and/or incorporated within relevant/specific topic chapters.

It is noted that the Scoping Report includes in Appendix A2, a list of sites to be considered as part of the cumulative effects. Please can you add the outline application for Land East of Stevenage (3/19/0118/OUT) to the list, as currently the list only includes the Reserved Matters application. For clarity I would advise that the table of cumulative schemes includes a column to identify which Local Authority boundary the site falls within, as there are sites within North Herts, Stevenage Borough and East Herts.

We query the methodology set out in 13.3. We would suggest you calculate a zone of influence for each of the 'scoped in' environmental impacts (topics) and create a list of reasonably foreseeable schemes within those zones that includes those schemes that fall within Tier 1 and Tier 3 in the Cumulative Effects Appraisal advice note from PINS. The link to this guidance is below.

<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-17/>

Please note that Tier 1 includes development where applications have been submitted, but not determined, and Tier 3 includes development identified in the Local Plan. These additional foreseeable schemes would need to be added to the list set out in Appendix A2. The zone of influence will vary with the different environmental impacts (topics).

Please note that the status of some schemes may change in the meantime or during the course of determining any application. Please be aware that Regulation 15(9) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 states that an authority which has adopted a scoping opinion following a request shall not be precluded from requiring of the person who made the request additional information in connection with any statement that may be submitted by that person as an environmental statement in connection with an application for planning permission or a subsequent application for the same development.

Natural England were consulted and provided a response. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development, including cumulative effects.

Built Heritage (Cultural Heritage)

In this regard I would refer you to Local Plan Policy SP18 (I) which requires as follows:

“Lower intensity development and / or green infrastructure provision to the north of the site to minimise harm to the setting of listed buildings.”

Clearly any chapter (and associated appendices) in relation to impacts and potential mitigation on Cultural Heritage Assets would need to take into account and assess the impact on the above list of features and assets. In addition, I would draw your attention to the response received from Historic England. I will not repeat what has been outlined by the Historic Advisor and I will only stress that the Council is in support and in agreement with the matters raised. They note from the Scoping Report that built heritage is to be scoped out which is somewhat disappointing.

Historic England make specific reference to two nearby Grade II* listed buildings. It is also considered that the setting of nearby Tile Kiln Farm (Grade II Listed) would be likely to be significantly affected by the proposed development.

I have also received the following response from the Council's Senior Conservation Officer:

“Having read HE's response and reviewing the documents I do think there will be a need for an assessment of the impact the proposals as part of an EIA on designated and non-designated heritage assets. HE has set out what I would expect from a proposal of this scale. For avoidance of repeating the guidance given by HE I have listed what would be required.

The EIA will assess the significance of heritage assets, their settings and contribution that makes to significance proportionate to their level of significance. Although there are none within the site there are those located on the boundary, and beyond which may have a level on intervisibility. This can be determined through the commissioning of a LVIA. There is an expectation that level of detail will exceed that of a matrix with a more in-depth assessment by way of expert analysis attached as an appendix.

The concept of harm versus benefit (as expressed in the NPPF) needs to be explored and conclusions formulated.

In summary I would concur with the HE what is required as part of the Scoping Opinion.”

As such the Local Planning Authority would wish to see Built Heritage Matters scoped into the Environmental Statement.

Great Ashby Community Council and Weston Parish Council are of the view that Built Heritage matters are scoped into the Environmental Impact Assessment.

Waste

Paragraph 14.18 – 21 of the Scoping Report sets out why Waste will be scoped out of the Environmental Statement. However, considering the scale the proposed development, particularly cumulatively with nearby development sites, it is considered that this site is likely to result in a significant amount of waste both during the construction and the operational phases. As such, it is the view of the Council that the Environmental Statement should include a chapter on Waste and which should be accompanied by a Site Waste Management Plan (in the interests of providing one, holistic/ comprehensive document, this should be included under the Environmental Statement).

This view is taken notwithstanding the comments from the Minerals and Waste Policy Team and is consistent with the view taken in relation to the Site NS1, Land North of Stevenage. I would draw your attention to the comments from the Minerals and Waste Policy Team, Herts County Council, which set out the information required in a SWMP. I have also attached the comments from the Council's Waste Management and Recycling Team.

Soils and Agricultural Land

The site contains a significant amount of agricultural land – an assessment of the grade of land and how this loss will impact on overall provision locally would be appropriate. Although the scoping report states there is no Grade 1 or 2 soil, it is silent on the presence (or otherwise) of Grade 3a which falls within the NPPF definition of 'best and most versatile' agricultural land. Natural England were consulted and provided a response, which is attached. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development. With regards to 'Soils and Agricultural Land' this reads as follows:

“The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development***
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.”***

Their comments also provide additional advice on this matter. As such, the Council is of the view that “Soils and Agricultural Land” should be scoped into the Environmental Statement.

I also refer you to the response received from Great Ashby Community Council and Weston Parish Council who are both of the view that 'Agricultural Land' should be scoped in.

Human Health

Based on the responses received from Public Health and the Growth and Infrastructure Team, Herts County Council, the Council is of the view that Human Health should be scoped into the Environmental Statement (as discussed under the socio-economic section above).

Climate Change

Natural England were consulted and provided a response. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development. With regards to Climate Change this states:

“The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what’s already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.”

Their comments also provide additional advice on this matter. Both the District and County Councils have declared Climate Change Emergencies. The Council's own Climate Change Strategy sets out North Hertfordshire's ambition to achieve a Net Zero District by 2040, 10 years ahead of the legally binding national target of 2050. On the basis of the advice from Natural England and the Councils' declarations, the Council is of the view that Climate Change should be scoped into the Environmental Statement.

I also refer you to the responses received from Great Ashby Community Council, Graveley Parish Council and Weston Parish Council who are all of the view that 'Climate Change' should be scoped in.

Utilities, services and infrastructure

I refer to the Infrastructure Delivery Plan (IDP) and these matters could be a stand-alone chapter or could be incorporated into the Socio-economic (Community services) chapter. Given the scale and scope of the proposed development (particularly combined with the adjoining development within Stevenage Borough) the Council considers it prudent for the Environmental Statement to include a chapter which considers and assesses the impact the proposed development would have on existing utilities and infrastructure (gas, electricity, water etc). I would refer you to the comments on this request for a scoping opinion from Thames Water. If required, the Statutory Consultee responses on the Local Plan, with regards to utilities are available on the Council's website.

Topics to be scoped out of the EIA

It is noted from the Scoping Report that you have also suggested that matters under the headings of, 'Daylight, Sunlight and Overshadowing', 'Human Health', 'Energy and Sustainability', 'Waste', 'Wind Microclimate', 'Ground Conditions' and 'Contamination', 'Built Heritage' and 'Agricultural Land' be scoped out and not included as part of the Environmental Impact Assessment.

The Council agrees on this stance in relation to 'Daylight, Sunlight and Overshadowing', 'Energy and Sustainability', 'Wind Microclimate' and 'Contamination' and considers that it would not be necessary to include or cover such matters within the Environmental Statement, as there would not likely be significant impacts with regard to these topic areas.

With regards to 'Contamination', the Environmental Protection Officer (Contaminated Land) has provided a response. She notes that issues relating to potential contamination on land have been scoped out of the Environmental Impact Assessment, following a phase 1 and 2 investigation of the site, which did not detect any evidence of contamination at the site, and she agrees that this is a reasonable position to adopt in relation to contamination on land, and would not expect the proposed development to have a significant impact with respect to contamination on land. She notes that the scoping report states that the report(s) relating to the phase 1 and 2 investigations regarding contamination on land will be submitted with the planning application and she welcomes this, as the proposal is for a land use which would be sensitive to any contamination which may be present, and so any potential impact of contamination on future users will need to be appropriately assessed.

However, it is considered that 'Built Heritage', 'Waste', 'Agricultural Land', 'Human Health' and 'Utilities, services and infrastructure' should be scoped in and included as part of the Environmental Impact Assessment for the reasons set out above.

Other matters

The Council has identified a small number of errors and omissions in the Scoping Report. Although it is not the role of the Council's response to correct these, the applicant should ensure are addressed in any future Environmental Statement:

As noted above, the site area in paragraph 2.1 is incorrect for the area within the red line on the site location plan.

- Ensure reference to the correct policy context:
- The Planning Context at paragraph 2.3 makes reference to saved policies of the previous saved Local Plan. This was revoked on adoption of the current Local Plan in November 2022 and to the ES should ensure it refers to the correct policies of the adopted plan;
- The transport section makes reference to the Stevenage Mobility Strategy but not the Local Transport Plan
- It is noted that the proposed description of development does not make reference to other forms of supporting infrastructure (e.g. Green Infrastructure, SUDs, BNG). This should be considered, particularly if it is the intention to use those parts of the red line site beyond the allocated GA2 site to deliver these. There is a conflicting description on p.44 which does make reference to these elements
- Paragraph 4.15 makes a reference to baseline conditions being based upon data from 2020 (or earlier) It is assumed this is an error given references in topic-specific sections to 2023 baselines and up-to-date surveys.

- There is an error in the Scoping report at 10.3 which makes reference to site being in the Thames Basin Heaths National Character Area which we assume is incorrect.
- It is noted that the Grade II and Grade II* listed buildings appear to be wrongly labelled on Figure 10.3 Designations Plan. I think Grade II buildings should be green triangles and Grade II* buildings should be blue triangles.

Consultee comments

All consultee responses are attached and are available to view on the Council's website, even if they have not been specifically mentioned above. I would request that you take into account the consultees' comments when working on the Environmental Statement and planning application(s).

Natural England were consulted and provided a response. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development. The advice covers several of the topics set out above. Further guidance is set out in Planning Practice Guidance on environmental assessment, natural environment, and climate change.

I would draw your attention to the response from Stevenage Borough Council who acknowledged that you are proposing to consider the socio-economic, air quality, transport, noise, ecology, landscape and visual impact, flood risk and drainage and archaeology impacts on the Stevenage local authority area as well as the application site and surrounding area with North Hertfordshire and is of the view that this is a sensible approach. We have not received a response from East Herts District Council.

We have followed up a response from Herts Ecology, as ecology and biodiversity are significant issues on this site, and their consultation response will be forwarded when received.

Conclusion

The Council has not received full consultation responses from all relevant technical consultees. On this basis we cannot be certain that further issues in relation to the content of the Environmental Statement will not arise following formal consultation on the future planning application and associated Environmental Statement. The Council reserves the right to request additional information on any matter within the Environmental Statement under Regulation 15(9) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Yours faithfully,



Ian Fullstone
Service Director – Regulatory

The Council's Privacy Notice is available on our website: <https://www.north-herts.gov.uk/home/council-data-and-performance/data-protection/information-management-gdpr>