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12/12/16
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East Herts District Plan – Chapter 12, East of Stevenage

Dear Sirs,

I am writing to object to the proposal in the East Herts District Plan known as Chapter 12 East of Stevenage.

In my view it is not compliant with existing policies, is unsound, not positively prepared, not justified, and not consistent with National Policy.

Apart from resisting development in the Green Belt, unless very special circumstances can be demonstrated, and I do not believe this has been demonstrated, there are other considerations.

River Beane

I write as Chairman of the River Beane Restoration Association (RBRA). The RBRA has been active for twenty years. The river Beane is a world rare chalk stream. The WWF believe there are only about 200 in the world and most are in the UK. The Beane, like better known chalk streams and rivers, was a famous trout fishing river and people came considerable distances to fish for trout here. There are references to fishing and fish poaching in Hertford Mercury reports of around 100 years ago.

The river has suffered from over abstraction for many years with the result that wildlife has mostly disappeared, and the upper river typically dries up in summer. The rest of the river, although not usually drying, suffers from low flow. This is typical of the UK treatment of natural resources. The WWF state publicly that they consider our treatment of rare resources such as rivers, and especially chalk streams, can be likened to other countries treatment of rain forests. In other words, sustainability was never considered when these decisions were made.

The main abstraction on the Beane is the Whitehall Pump station which was built in the 1950's to supply Stevenage through a local Stevenage wide water supply network. The Whitehall Pump station is a complex of three deep boreholes with associated water treatment works located in the South of Aston Parish near to Watton at Stone.

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After twenty years of campaigning to have the abstraction reduced at the Whitehall Pump station, Ofwat, the water industry regulator, agreed a licence reduction of 90% in 2014, to be operative from April 2018. The licence reduction has now been made official by the Environment Agency.

Our campaigning included

- Support over many years by all the Parish Councils along the Beane valley
- The WWF included the Beane in their reports on the state of England's chalk streams
- Being supported by our local MP's Stephen McPartland (MP for Stevenage) and Sir Oliver Heald (MP for North Herts which includes Watton at Stone)
- A visit from a Government Environment Minister
- The Beane was included in a debate in Parliament when 'The condition of rivers in England' was debated in an early day motion sponsored by Sir Oliver Heald and which had significant support from other MP's with rivers in their constituency.
- The Angling Trust launched their 'Charter for Chalk Streams' at an event on the Beane. This was attended by around 50 people from around the country and included the H&MWT, the EA and MP's Charles Walker (MP for Hoddesdon) and Stephen McPartland (MP for Stevenage)
- Being interviewed and featured on BBC radio 4 in a special 'Face the Facts' programme
- A filmed documentary which was shown at the Hertford theatre
- An award from the CPRE in recognition of our publicity efforts
- We are a partner with the Herts & Middlesex Wildlife Trust, the Environment Agency and Affinity Water in the River Basin Management Plan
- We have benefited from wide ranging public support

Details of any of the above can be provided if required.

So that water supplies to Stevenage can be maintained after this large reduction from 20 mega litres per day down to 2 ml/day, the water supplier, Affinity Water, has built a pipeline to import water to the existing treatment works. This has cost a reported £3 million.

This licence reduction is part of a bigger programme to improve river quality, which is legally binding, and is against a background of only 17% of English rivers meeting acceptable environmental standards in 2015.

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The passage below in italics is from the WWF

Efforts to improve the quality of rivers, streams, lakes, groundwater and coastal waters in the UK have been going on for many years, mostly driven by the requirements of EU Directives (Water Framework Directive, the Drinking Water Directive and the Bathing Water Directive).

The EU Water Framework Directive (WFD) required all member states to have at least “good status” of all water bodies by 2015. Although the country has made considerable progress in improving water standards, England is still far from meeting the legally binding EU water pollution targets by 2021, six years after the initial deadline. According to the Environmental Agency’s draft river basin management plans (RBMPs), compliance with the Water Framework Directive standards are expected to have risen to just 25% in 2021, up from 17% in 2015. Improvement measures over those five years are estimated to cost the country more than £25 billion.

In 2015 the Government updated the River Basin Management Plans, a scheme within the Water Framework Directive, established to guide organisations, stakeholders and communities on how to work together to improve the water environment. The plans complement the work underway to develop a wider 25-year plan for the environment and aims to strengthen the potential of data, local partnerships, environmental technology and environmental markets to deliver more for the environment as well as to contribute to economic growth.

This shows that the licence reduction on the Beane is not just a local matter but is actually part of UK government national policy, and one where we are lagging behind our environmental commitments.

Large developments which will be supplied from the Stevenage water supply network will increase demand. In Stevenage there are developments under construction which will add an estimated three thousand or more new dwellings. These are mainly conversions of 5 office buildings to flats as well as some new build at Bragbury End, and others, which have mainly not yet been completed. The East of Stevenage proposal simply adds to this total and because it is actually in East Herts, the whole picture may not be visible to you.

If all these new developments cumulatively increase water demand to the extent that the recently hard won licence reductions cannot be maintained it would be a retrograde step and would fail any sustainability assessment. If the increased demand is met from as yet to be identified additional resources, it would also increase costs for consumers because of the need to develop more expensive alternative sources of supply. In addition, these could not

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be brought on line for many years leading to a short term shortfall in supply which would, in all probability, be met by increasing the take from the Whitehall Pump Station boreholes once again, leading to further degradation in the river.

The Beane Valley

As well as the above remarks about the river and the water quality, the **Beane Valley** also needs to be considered.

This part of the Beane valley is known by East Herts Council as the Middle Beane Valley, area 59. Part of the description by EHC under the heading '**Strategy and Guidelines for Managing Change, Improve and Conserve**' includes '**encourage the conservation of existing development pattern and resist any extensive development which would significantly affect this**'. The East of Stevenage proposal is contrary to this strategy.

Stevenage currently has an effective boundary with the Green Belt and the Beane valley. This is the bund along Gresley Way topped with trees. It has done a remarkable job in preserving the valley from intrusion.

The East of Stevenage development, despite the claims about the effectiveness of the tree screen on the site, will be visible. The site is not a plateau as claimed, but has a 20 metre slope. This means that the ground level of buildings at the top of the slope will be visible above the trees. Three storey buildings will be visible from most of the site and no one has mentioned that all will be visible in winter when the leaves come off the trees.

Over the years there have been several proposals for development in the Beane Valley. Some of these have gone to public enquiry. All have been refused on the grounds of causing significant harm to the landscape character of the surrounding area. This proposal is no different.

Water Voles

At present there are very few water voles in Hertfordshire Rivers, and none on the Beane. They used to be common, but the population collapsed due to the predatory activities of mink which were released from mink farms a few years ago.

The river Beane and the Beane valley have been identified by the Herts & Middlesex Wildlife Trust (H&MWT) as a possible location suitable for the reintroduction of water voles. This is a long term project of between three and five years. It is being hosted by H&MWT and has the full support of the Environment Agency.

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The success of this project will depend on increased water flow in the river after the abstraction has been reduced in 2018. It is thought it might take two years before the improved flow is established. It will also depend on a number of other things which includes finding, or creating, suitable river bank habitat and locations which are relatively undisturbed.

The RBRA have volunteered to carry out surveys of the whole river to find suitable locations for reintroduction. The EA and H&MWT depend on volunteers for these activities. At the moment this is being planned and RBRA volunteers have begun training in survey techniques and reporting.

Conclusion

Sustainability and the conservation of the Green belt and nature is part of local and national policies. It does have its place, and locally that place is the Beane valley. The Beane valley is a rare gem and needs to be looked after. The East Herts Council Middle Beane Valley assessment which encourages conservation and resists development has got it right.

Any proposal for large scale development in the Beane valley will cast doubt on the longer term viability of the plans outlined above.

I know from personal experience, when I was an Aston Parish Councillor for sixteen years, that the planners at East Herts Council are hard working professionals, and in the time that I was discussing planning with them for our Parish Council, this proposal was not being considered.

The East of Stevenage proposal is contrary to existing local and national policies. It appears to have suddenly emerged almost as a panic measure to meet a timetable. This is not good enough. The East of Stevenage proposal section of the District plan should not go ahead.

Yours faithfully

D G Stimpson
Chairman – River Beane Restoration Association