

## **Dacorum Environmental Forum's response to the LA3 (West Hemel) revised planning application 26/7/19**

DEF's response to the earlier Planning Application of February 15<sup>th</sup> 2019 referred to the following list of associated documents:

Planning statement	44829424.pdf
Design and Access statement	44828024.pdf
EIS Ecology and Biodiversity statement	44827590.pdf
EIS Transport and Access	44827592.pdf
Illustrative Green Infrastructure Strategy	44827682.pdf
Illustrative Master Plan	44827676.pdf
Road Hierarchy	44829042.pdf
Summary of mitigation and residual effects	44827597.pdf
Environmental Impact Landscape Character and Visual Amenity statement	44827589.pdf

We note with some disappointment that:

1. The majority of the 296 associated documents of the revised application are, as with the February 15<sup>th</sup> application, given duplicate names, making documents hard to find and thereby creating a barrier to public participation. This despite the responses to that application which were critical of this practice.
2. Notwithstanding this hurdle all of the above-listed documents have been found, unaltered, associated with the revised application.

Because of (2) our objection to the February 15<sup>th</sup> application is still valid. For convenience this is attached/appended and forms part of our current objection, and is summarised below. Additional questions raised at the May 20<sup>th</sup> meeting convened by DBC planners and attended by representatives of the developers and three objector groups, and which still need answering before approval is granted, are identified by curly brackets { }.

### **Wildlife Corridor for Shrubhill Common LNR**

The plan should be modified to reserve a substantial wildlife corridor (at least 100m wide) between Shrubhill Common Nature Reserve and the wider countryside. The strip of fields currently to the west of The Chiltern Way already serves this function. The Planning Statement 44829424.pdf, Para. 6.48 promises to "Protect a Wildlife Corridor along the eastern side of the development adjoining Fields End." This is the Chiltern Way route that we support, but this is contradicted by other supporting documents as previously detailed. Unless the "whole field width" corridor is provided, in order properly to protect the Wildlife Corridor from parking and other urban edge abuse, a new hedge should be created, parallel to the and to the West of the Chiltern Way, at the same time retaining the existing double hedgerow. This would accord with the Design and Access Statement's objective to "further supplement and reinforce these networks with new planting." (Under "Landscape Strategy", Page 74. Roughly estimating for instance from the Illustrative Master Plan , 44827676.pdf, the removal of a few dozen houses from the Eastern edge of the plan would provide a much more adequate corridor. For the sake of the survival of the LNR, this part of proposed increase of 200 compared with the (initial) Core Strategy provision for 900 homes should be rejected.

{What width of Wildlife Corridor for Shrubhill Common Local Nature Reserve following the Chiltern Way route is to be provided?

Are the developers prepared to remove some of the 200 homes by which the planning application exceeds the allocation in the Core Strategy in order to provide an adequate corridor?

Do the developers own the hedge between Chiltern Way and existing housing, and will they restore it in places where it has become degraded?}

## **Green Infrastructure and Biodiversity**

Planning consent should be subject to commitments to adhere to the practices outlined in the RSPB magazine 'Nature's Home' Summer 2018: article 'Neighbourhoods for Nature' p28-33 which reported that Barratt Developments was "leading the field in a partnership with the RSPB". The measures quoted included:

- Putting Swift bricks in every building (manufactured by Manthorpe)
  - Planting hundreds of native trees, including a community orchard.
  - Lining roads with new hedging, whilst preserving ancient hedges.
  - Planting grass verges with native wildflowers
  - Making small holes in the bottom of fences to make easy access for hedgehogs, frogs and newts.
  - Planting the pools and channels of the planned sustainable drainage system with native vegetation.
  - Installing wildlife corridors under main roads, bat friendly street lighting and amphibian friendly kerbing and.
  - Inspiring new residents about these nature friendly measures by using a show home and garden
- Another idea proposed by DEF, and similarly low cost, is to enhance water conservation by providing water butts in gardens.

## **Water Conservation.**

The applicant must be required to demonstrate that the plan will not result in any reduction of the rate at which water currently feeds into the aquifers of the dry valley above the LNR, as such a reduction would have a detrimental impact on its ecosystem, particularly during sequences of dry months or years. {Has this been done?}

{Has the applicant demonstrated that water can be supplied to the proposed development without detriment to the flows in either the Gade or Bulbourne Valleys?}

## **Eco Housing and building.**

The Design and Access statement 44828024.pdf 77 is too vague, saying merely "... the development will comprise energy efficient buildings throughout, with *good insulation* and energy efficiency, encouraging energy monitoring systems so that future users are acutely aware and able to control energy use. A high number of the houses will have at least one south facing main elevation, facilitating *passive solar gain*, taking advantage of *solar technologies* and reducing energy costs." There is nothing here that specifies the codes or technologies that will be adhered to. Our original objection calls for more forward-thinking, sustainable requirements, and justifies this by referring to the Core Strategy.

## **Works Schedule**

Regarding the avoidance of disturbance to breeding birds, the wording from the Summary of mitigation and residual effects 44827597.pdf" - "Any clearance of potential nesting habitat will be undertaken outside of the bird nesting season or immediately following confirmation by a suitably qualified ecologist that no active nests are present" should revert to that of the Draft Master Plan of 2014 (Para. 3.12) which had "Site clearance should be undertaken outside the breeding season and mitigation should be considered through the detailed design process."

{Who is the qualified ecologist on whose advice site clearance would be allowed during the breeding season, and on what terms is he/she employed?}

## **Landscape**

Re the Environmental Impact Landscape Character and Visual Amenity statement, 44827589.pdf , in line with stated policies in the Core Strategy and elsewhere within the application, the visual impact should be further minimised by removing buildings with "Moderate Adverse" (= "Significant") effects from the plan. This can be accommodated by a reduction of the 200 extra homes that the plan proposes in excess of the original Core Strategy figure.

{Has the application been referred to the Herts Design Review Panel, as recommended in the National Planning Policy Framework (NPPF) (Para 129)?}

{Have the applicants demonstrated the scheme's conformance with Sir John Lawton's 2010 Government-commissioned report 'Making Space for Nature' and HCC's Landscape Character Assessment, under which LA3 forms parts of the "Little Heath Uplands" and "Lower Bulbourne Valley" areas of study?}