

Dacorum Environmental Forum's response to the LA3 (West Hemel) revised planning application 27/9/19

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

Planning statement	44829424.pdf new ID=44844949.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 15th 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 apart from the Planning statement44829424.pdf (new ID=44844949.pdf) have again been found, unaltered, associated with the second revised application.

Because of (2) our objection to the February 15th application is still valid. For convenience this is attached to the E-mail version of the current objection, sent to the Planning Officer and others, and forms part of our current objection, and is summarised below. Additional questions raised at the May 20th 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.

Paragraph 7.71 in the Planning Statement of the current (September) planning application could be taken as responding to our previous objection regarding on-site wildlife measures, but the wording in 7.71 "applicants are supportive of a planning condition which would require the provision of . . . (wildlife measures)" implies that it won't happen unless DBC do impose such requirements.

The urgency of this matter was given further emphasis in the Report of the Climate Action Summit in Paris in May this year, which stated that: "Nature is declining globally at rates unprecedented in human history – and the rate of species extinctions is accelerating... The Report finds that around 1 million animal and plant species are now threatened with extinction, many within decades, more than ever before in human history.

Not only is this disastrous for the natural world but it will also harm the human population. The report goes on to say:

"The diversity within species, between species and of ecosystems, as well as many fundamental contributions we derive from nature, are declining fast, with grave impacts on people around the world now likely... Loss of biodiversity is ...shown to be not only an environmental issue, but also a developmental, economic, security, social and moral issue".

It concludes that "The primary cause of this is changes in land and sea use...."

Developers should be required to take notice of this serious warning and take responsibility for impacting as little as possible on the land they build upon, by taking steps to accommodate wildlife in the estates they build.

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, or indeed commits the developers to do anything regarding solar panels. Our original objection calls for more forward-thinking, sustainable requirements, and justifies this by referring to the Core Strategy. In particular, recent global developments regarding sustainable energy generation result in solar PV panels on all roofs in the development being a strong selling point, rather than a cost disincentive.

Paragraph 7.78 in the Planning Statement of the current (September) planning application could be taken as responding to our previous objection regarding Building Standards but 7.78 still only commits to minimum legal Building Standards requirements.

Since the IPCC in 2018 raised its “threat level” of uncontrollable climate change by carbon emissions, the Rt Hon Michael Gove has made radical policy decisions regarding the electrification of road transport, and Ms Greta Thunberg has embarrassed world and corporate leaders by drawing attention to their inaction. HM Government and more recently DBC have also declared “Climate Emergencies”

This growing political imperative to counter climate change gives added cogency to the suggestions made by DEF in our previous objection and subsequently at the meeting with developers on May 20th this year, and we feel that two in particular need special consideration in this respect:

We suggest that all the houses and buildings with suitable S, SW, or SE facing roofs should be equipped with solar panels or solar tiles. Given that such panels would (typically for a 4kW array) give enough energy to drive an electric car for 1600 miles, this would be a very attractive selling point, and the cost to the developers (much less than retro-fitting) would be recovered at the time of sale. (We note that the Government has recently opened up consultation regarding a new tariff for solar energy) Residents would effectively have a free fuel pump at the house, but would of course benefit from the energy produced, even if not car owners.

□ We also suggest that Considerable CO2 emissions reductions, with consequently smaller household heating bills can be achieved by using insulation of the highest standard, and we suggest that Code 6 is adhered to throughout. Proportionally a small cost to the purchaser, but recoverable by BD at the point of sale, discerning purchasers would factor to this into their budgets, particularly if advertised in the “show homes”.

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?}