



WHITE PEAK Planning

Matter 19 Hearing Statement: The Natural Environment

North Hertfordshire Local Plan Examination

On behalf of Bloor Homes and The Crown Estate

November 2017

Ref: 2012.002

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Authorised for and on behalf of White Peak Planning Ltd.

A handwritten signature in black ink, appearing to read 'Rob White', written over a horizontal line.

**Rob White
Director**

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party. Any such party relies on this report at their own risk.



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1.0 Introduction

1.1 Background

- 1.1.1 Bloor Homes and The Crown Estate control a substantial tract of land within the area identified in the Local Plan submission version as the Land East of Luton allocation (refs: EL1, EL2 and EL3).
- 1.1.2 Bloor Homes has submitted a planning application (ref: 17/00830/1) covering the majority of allocation sites EL1 and EL2 for up to 1,400 new homes, as well as a local centre, primary school and all-through school.
- 1.1.3 The Crown Estate has submitted an outline planning application to NHDC (ref: 16/02014/1) for 660 new homes covering Site EL3.
- 1.1.4 The application documents include an Environmental Statement (ES) and a Flood Risk Assessment (FRA) and these can be viewed on the Council's website via the following link: <http://pa.north-herts.gov.uk/online-applications/>.
- 1.1.5 As set out in previous representations to the Local Plan process, we **object** to Policy NE8 as currently worded and our responses to the questions posed by the Inspector are thus set within this context.

2.0 Responses to Inspector's Questions

2.1 Issue 19.9

19.9(a)

2.1.1 We agree with the Inspector that taken at face value, clause (a) appears to state that planning permission for development will only be granted [emphasis added] where the most sustainable drainage solution is used, which according to 'Figure 5: Sustainable Drainage Hierarchy' is Living Roofs.

2.1.2 Including living (i.e. 'Green') roofs on all new development would be an unachievable requirement to fulfil and recommend that clause (a) is deleted in its entirety. We also recommend that clause (c) is amended to include the words 'where feasible and viable' to avoid the requirement for overly restrictive adherence to the SuDS hierarchy.

19.9(b)

2.1.3 We do not consider it reasonable for clause (d) to state that permission will only be granted where developers have consulted with the Lead Local Flood Authority at the earliest possible opportunity [emphasis added].

2.1.4 This requirement as currently worded is subjective and we recommend that the words 'at the earliest possible opportunity' are either deleted or replaced with 'prior to submission of the planning application'.