LOPMENT MANAGEMENT AGENDA

THURSDAY 17 DECEMBER 2020 AT 6.30 PM
MICROSOFT TEAMS - MICROSOFT TEAMS

The Councillors listed below are requested to attend the above meeting, on the day and at the time and place stated, to consider the business set out in this agenda.

Membership

Councillor Guest (Chairman)
Councillor C Wyatt-Lowe (Vice-Chairman)
Councillor Beauchamp
Councillor Durrant
Councillor Hobson
Councillor Maddern
Councillor McDowell
Councillor Oguchi
Councillor Riddick
Councillor R Sutton
Councillor Uttley
Councillor Woolner
Councillor Tindall

For further information, please contact member.support@dacorum.gov.uk or 01442 228209

AGENDA

(j) Addendum (Pages 2 - 39)

DEVELOPMENT MANAGEMENT COMMITTEE

17th December 2020

ADDENDUM SHEET

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Item a

20/02519/MFA Construction of 58 apartments, external amenity spaces and communal garden/play area.

Paradise Fields St Albans Road Hemel Hempstead Hertfordshire

1. Plan numbers **2392_PL_010_C** (Proposed Site Plan) and **2392_PL_011_C** (Proposed Landscape Site Plan) are to be replaced by **2392_PL_010_D** (Proposed Site Plan) and **2392_PL_011_D** (Proposed Landscape Site Plan).

   The new plans state that: *50% of all parking spaces will have active EV charging points, with all remaining parking spaces to have passive EV provision.*

   The specific EV spaces shown on the previous plans have been removed (as the details will be secured by Condtion 9).

2. Comments received from Hertfordshire Ecology (dated 20/11/20) omitted in error. Included below for reference:

   Thank you for consulting Hertfordshire Ecology on the above application, for which I have the following comments:

   > *1. The proposal will result in the loss of an ancient grassland meadow, one of a series of historic fields leading down to the River Gade, as well as some associated scrub and woodland. The intrinsic quality of the grassland was considered some years ago to be low-moderate, of insufficient value for meeting Local Wildlife Site (LWS) status, principally given its relatively species-poor and rank condition. The continuation of*

indifferent management (largely none?) in recent years is unlikely to have changed this assessment, although the adjacent fields were previously considered to be of sufficient quality to meet LWS status.

2. The field itself nevertheless still represents a locally valuable biodiversity resource, so the planning statement 5.2.6 regarding protection and enhancement of the site's ecology is of little or no substance, despite the claims it meets the NPPF expectations. All locally valuable features which form part of the proposals are already present, whilst enhancements on site cannot possibly compensate for the loss of grassland and indirect impacts on the adjacent habitats and LWS. In this regard it should be noted that whilst 'Amelanchier canadensis' as proposed in the DAS for the habitat garden is indeed a native species, its range is eastern N America…. If native trees and hedge species are desired to reflect the native chalklands of west Hertfordshire, alternative species will need to be used. If more ornamental species associated with built development are desired - as proposed for the habitat and courtyard gardens - this shouldn't be described as native planting.

3. No formal proposals for demonstrating or delivering Biodiversity Net Gain (BNG) have been provided in the planning statement. Whilst this is currently not a mandatory requirement, the weight that should now be attached to this emerging Government. policy is quite clear, as is the process to demonstrate that it can be achieved (a Biodiversity metric; NE v2 is recommended). For major developments of this nature and given the impact it will have, BNG should now be considered as a necessary expectation of any such planning proposal. This is consistent with other similar development proposals in and around Hemel Hempstead.

4. The woodland management needs to be cautious in order to avoid trying to introduce too many variations in such a small area. Coppicing is fine in a neglected coppice woodland; this wooded area does not have this legacy and is too small to achieve significant beneficial effects.

5.1 The Preliminary Ecological Assessment confirms the value of the site similar to that previously recorded by Herts Biological Records Centre in 2000. However, the PEA considers it to be species-rich, calcareous grassland of potential LWS value, and should be retained pending further surveys.

5.2 The hedgerows are undervalued in the PEA; the NW boundary hedge was recorded by HBRC as supporting no less than 14 native woody species, including those characteristic of a chalky substrate (e.g. buckthorn, dogwood, spindle). It is therefore likely to be of importance

under the Hedgerow Regulations. It is an historic if not ancient hedge, present on the 1880s OS map and likely to be much older as suggested by such a range of woody species.
5.3 Biodiversity Net Gain is recommended in the PEA, which states (PEA 4.12) To ensure net gain, replacement/compensatory areas of calcareous grassland would need to be created off site, on habitat that does not already have significant biodiversity value. This compensation should ideally be as close as possible to the development site. No biodiversity metric has been presented to demonstrate the extent of 'Biodiversity Units' this would need (and so cost) or where this could be achieved. However, it can only be assumed that this represents an acknowledgement that BNG must be delivered if the development is to proceed and that the capacity of delivering it on-site is negligible. As such, this must form part of the application proposals.

5.4 Bats, reptiles and badgers were recommended for further surveys. The importance of the adjacent LWS is highlighted, as well as the need to reduce indirect impacts, including disturbance, lighting and shading.

5.5 Proposed enhancements include a pond [not a characteristic of chalk habitats], green roof, SUDS [debatable benefits], chalk grassland [where possible], trees, bat roosting opportunities, deadwood habitat [stag beetle most unlikely]. These are supported if they can deliver genuine benefits, and although welcome I would attach limited weight to their contribution to biodiversity onsite.

5.6 Notwithstanding issues raised above, on balance the PEA gives a broadly reasonable and fair account of the principle ecological characteristics present on the site and recognises the need to deliver BNG.

6.1 As proposed in the PEA, the grassland habitats have been further assessed with a detailed National Vegetation Classification survey to more fully consider their value. The development site survey was undertaken at an optimum time of year (August 2019) and was considered to support 0.66ha 'MG5' [neutral] grassland and a 'priority habitat', although the best fit by 1.09% was a small area of MG1e. Such relative % differences are insignificant in the scheme of things, which can change from season to season. The adjacent LWS was surveyed in October (sub-optimal) and found to support 2.8ha of MG5a grassland, transitioning to MG1e and although less valuable, still considered to be a priority habitat. It is acknowledged some species were not visible during this late field season assessment.

6.2 The northernmost grassland was considered to be MG1e and the least valuable. The development would result in the loss of 0.46ha of MG5

grassland [surely ALL of the 0.66ha will be lost?], whilst the remaining LWS grassland was considered will continue to degrade without appropriate management – which is true for all such grasslands. It is proposed that this should be managed and monitored to compensate for the loss of development site grassland – which is inconsistent with the PEA recommendations.

6.3 I have no reason to consider the NVC surveys to be other than sound. They are broadly consistent with the HBRC survey of 2000, and in fact the northern most field may even have improved. LWS criteria have changed since the 2000 survey and require more indicator species to be present, although there are also increased indicator species. The LWS still meets the HBRC and Ecology by Design survey data, but all grasslands are suffering from poor management leading to rank swards.

6.3 The NVC surveys differ from earlier HBRC survey in that the development site grassland was considered to be of poorer quality than the middle two and not of LWS status, in contrast to the current assessment. The furthermost northern field was considered the poorest by HBRC, consistent with the NVC survey. This was despite the development site and middle two fields having been previously ploughed around 1995, possibly in an attempt to diminish their value or reduce access capability. The recent NVC species lists for the grasslands are broadly similar to the earlier surveys although some species were not recorded (e.g. oxeye daisy), at least in the NVC quadrats.

6.4 Whilst the survey and report are relatively good, regrettably the final recommendation is disappointing. The development will cause the loss of a locally significant ecological resource – considered to be a Priority Habitat - and this must be compensated for as outlined in the PEA. There is no meaningful means of achieving this onsite, whilst the adjacent LWS already exists and so cannot benefit from additional neutral / calcareous grassland creation. Management of the LWS should be happening in any event, although given it will be subject to increased disturbance, the proposals would also need to address this in addition to compensation. Whilst cutting and removal is proposed and is a suitable option in the absence of grazing - which would bring added ecological benefits - it does not replace the priority habitat lost. Consequently, compensation for the loss of the development site grassland remains outstanding.

7. The detailed badger survey found two active badger setts on the site, although these were considered to be irregularly used as outlier setts. The

dell hole has long been known to support badgers, which is remarkable given the location of the site in the middle of the town and adjacent to the main dual carriageway where badger casualties have been recorded. The development site field adjacent to the dell will provide a considerable foraging opportunity within the immediate clan territory and its loss will represent a substantial degradation of this resource and weaken the corridor to the LWS grassland. The promotion of the dell feature for recreation will further degrade the site for badgers, which may lead to more badger fatalities on the adjacent dual carriageway. However, appropriate recommendations are given for their protection during construction and I am satisfied this is achievable. Whether the badgers are likely to remain in the longer term is not discussed - and that must be a key issue in respect of maintaining biodiversity where possible. Fox and rabbit holes were also recorded.

8. In respect of bats, detailed assessments of trees supporting potential roosts have been made. Six trees with some suitability for roosts were recorded, three are to be removed (low suitability) and three retained in close proximity to the development (limited suitability and possible features). The retained trees will be protected from development impacts and lighting, whilst those to be removed will be soft felled following inspection by a bat ecologist. I am satisfied this is sufficient to address bat issues directly impacted by the development.

9. The reptile survey followed best practice using 30 refuges over 6 weeks and did not find any evidence of reptiles (or amphibians) on the development site. Whilst there have been old records of grass snake from the LWS, I have no reason to question these findings.

10.1 The Landscape Management Plan is generally sound. However, it includes references to hedgerows, and that none are considered as priority habitats under NERC. This is almost certainly wrong (see 5 above). The NW boundary hedge is also an important boundary of the adjacent LWS and will provide a physical and visual buffer against the development. Its management objective 3.51 must include its ecological value; it should not be reduced to a 'neat and formal structure' within the landscape scheme as this will be severely damaging to its wildlife and visual amenity role in helping to offset the impact of the development from the LWS. Trimming back to its current size where necessary would be acceptable in the timescales proposed but this is an historic feature which makes a significant, semi-natural rather than formal contribution to the local landscape and biodiversity corridor and should be managed as such.

There is already an adjacent footpath and so this feature should not be considered to represent a health and safety hazard, unless obviously dangerous. To trim the hedge, and then propose new trees (including species already present as well as species not suited to chalk - silver birch, cherry as well as ornamental non-native species) is simply damaging and inappropriate; I consider the approach to this major feature retained as a boundary to the site is unacceptable and must be reconsidered.

10.2 The SUDS contribution to biodiversity is welcome but debateable; engineered hollows designed to fill with and then release water will not create a permanent wetland or damp grassland feature unless specifically designed to do so in which case they will need to be much bigger, deeper and different to enable their primary SUDS function to be delivered. Proposed vegetation removal will not benefit adjacent habitats as suggested – it will enable the SUDS function to continue at the expense of natural, wetland species, demonstrating the caution expressed above. However, I don't object to the aspiration.

10.3 Hedgehog houses, log piles, insect hotels and bird boxes are all supported. The development may discourage some wildlife from using the development site which may deflect some damaging impacts of the A414, a significant barrier and danger to biodiversity movement through the town.

11.1 Woodland Management Plan. This is currently a disturbed, urban woodland site. Nevertheless, it has retained a valuable element of 'wildspace' given its secondary but natural origins despite the location. Consequently, trying to create something which it isn't will be harmful to its existing character and biodiversity. Whilst the use of this area for community use may benefit the site by formalising use which is currently abusing the site (flytipping), this shouldn't 'sanitise' a woodland and scrub area otherwise not formally used in any way by imposing any formal recreation structures, aspirations or projects. Removal of trees and shrubs to bring more light into the woodland floor is sensible to encourage a ground flora but not if subsequent use then introduces trampling and disturbance which will counteract any benefits. Clearly the badger sett appears active and effort must be taken to retain this ecological asset if possible – and badgers can be affected by disturbance. It has been a semi-natural wooded area in-part for over 150 years.

11.2 I support several of the general overall woodland management objectives; however, attempting to create too much habitat diversity would be counter-productive for this site - it is too small, is not an ancient

woodland area with a legacy of extensive traditional management and so 'restoration' is not an obvious option. Why thin holly without demonstrating what the benefits will be? This is management for the sake of it. Coppicing hazel may or may not be appropriate; if a few stools are present beneath a closed canopy, regeneration will not succeed strongly, and it is unlikely that any significant ecological or structural diversity benefits will accrue. No evidence is presented that this approach would be of benefit.

11.3 I am concerned that the approach will attempt to impose a substantial formality to the site which will be detrimental to the ecological and natural aspect the site currently displays. Such areas are precious within urban environments and proposals to remove their characteristics with no obvious benefits should be avoided if existing and new communities are to appreciate the existing nature of such areas. I am not against management or change; but I see no justification for some of the proposals included in the management plan if biodiversity is to represent an important consideration. The woodland at Shrub Hill Common is not subject to such management and yet it remains a valuable amenity resource for local residents.

12. Based on the evidence above, I am unconvinced that an appropriate ecological approach has been taken to the development of this site. Whilst the complex of ancient fields are locally valuable, the development site does not meet LWS status and the weight attached to the need for development is likely to outweigh its ecological value. On this basis I do not consider the grassland represents a fundamental constraint on development. However, this places considerable emphasis on compensation for the loss of open grassland as part of Biodiversity Net Gain - which although supported in the PEA, has not been formally proposed or submitted elsewhere. Consequently, should this application be approved, as a Condition there must be a BNG proposal, supported by NE's Biodiversity Metric v2, to demonstrate the impact of the development on the site and how the necessary expectation of compensation and 10% enhancement, consistent with emerging BNG policy, can be achieved.

13. Securing the appropriate management of the existing adjacent LWS which will be indirectly affected by the proposals – is also important but does not replace the loss of biodiversity resource itself on the development site. Improved management of the adjacent LWS should also be considered as part of the BNG enhancements.

14. The Landscape Management Plan should be re-submitted to address the issues raised above, as a Condition of Approval.

15. The Woodland Management Plan should be re-submitted to address the issues raised above, as a Condition of Approval.

16. Given the loss of a priority habitat - an integral surviving part of a series of ancient meadows in the middle of Hemel Hempstead - and the associated impact on the adjacent LWS and woodland, unless the Conditions outlined above are attached to any permission, I consider that the application should be refused given the detrimental impact it will have on biodiversity within the town.

I trust these comments are of assistance

3. Section 6 of the committee report (Constraints) refers to the site as forming part of a Local Wildlife Site (Wildlife Site: Paradise Fields Central); however, this is not the case. It abuts the aforementioned wildlife site.

4. Since publication of the committee report, the ecological consultant for the applicant has conducted the Biodiversity Metric, the results of which are summarised below in a letter to the County Ecologist:

I write to you in regard to the consultation received from you for planning application ref.: 20/02519/MFA. Thank you for your comments and for liaising directly with us on the matter to which our response is outlined below.

*As agreed with yourself, in response to concerns over biodiversity net gain, we have completed a Biodiversity Impact Assessment (BIA) of the proposed development and off-site enhancement of the adjacent Local Wildlife Site (LWS) grasslands utilising the DEFRA Metric 2.0. Based on the results of the metric, we anticipate that the proposals will result in a loss of **-5.37** habitat units of biodiversity and a gain of **0.59** linear units on site.*

*To offset the loss of 5.37 habitat units on site, we propose to enhance the lowland meadow grasslands of the site-adjacent LWS through adopting them into an active management regime as detailed in the NVC Report produced to inform the application. Based on the results of the metric, an improvement of **9.88** habitat units will be achievable through these actions; resulting in an overall net gain of **4.52** units (42.32%) as a result of the proposals. This is well in excess of the 10% target for net gain.*

It is proposed that the ongoing management of the site-adjacent LWS grasslands is secured via a Section 106 agreement or similar legal

mechanism. A planning condition should also be stipulated for the production of a Landscape Ecological Management Plan (LEMP) or similar (covering no less than 30 years and including specification of ongoing monitoring to ensure compliance), to outline the precise management regime required.

Further details of the proposed approach were outlined in an email from the consultant ecologist to the case officer on 10th December:

We will be proposing a traditional hay cut on the meadows. This management regime will centre around leaving the grasslamds unmanaged to grow long and flower between April and late July. Around late July, the grass should be cut and left in place for a few days to dry and shed seed. After this the arisings ***must*** *be removed – e.g. hay bailed.*

Between late July and winter, the grass will ideally be grazed at a low intensity; e.g. by sheep – you can find farmers who will provide and erect temporary paddock fencing and do this for cheap, free, or even pay to do it on good sites. In cases where this is not possible (such as I imagine this site), we'll need to mimic grazing by infrequent mowing ***and immediate removal of arisings****.*

The meadow is left unmown over winter and then lightly grazed or mown once/twice again as required in March/early April – again, the arisings ***must*** *be removed.*

It is the removal of cuttings where this management regime usually falls down. The hay cut must be bailed and removed and the grass clippings during other cuts must also be removed – otherwise the soil continues to be nutrified by the rotting arisings and the sward will continue to deteriorate. Management contractors repeatedly agree to this when signing contracts/producing quotes and then don't actually do it on the day so we'll need to work closely with them to ensure it happens.

The prescribed management will include update periodic monitoring surveys (mixture of quick walkovers and more detailed assessments) and may involve some mechanical intervention such as localised harrowing.

Comments in respect of the metric and the proposed approach are yet to be received from the County Ecologist.

Recommendation

Delegate with a view to approval subject to the completion of a S106 agrement and ecological matters being suitably addressed.

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Item b

20/02738/FUL Redevelopment of commercial site to provide 2no. dwellings with associated

access, hardstanding, landscaping and parking

Land Rear Of Southern Wood 12 Trowley Hill Road Flamstead Hertfordshire AL3 8EE

Recommendation

As per the published report.

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Item c

20/01754/MFA Construction of 28 residential dwellings (including 50% affordable housing) with access off Tring Road, including parking and garaging, creation of public open space, landscaping, and all enabling and ancillary works.

Land Off Tring Road Wilstone Hertfordshire

Additional Representations

Lead Local Flood Authority (LLFA)

Following our letters dated 27 October 2020 and 28 October 2020, the applicant has provided the following additional information in support of the application:

- Surface Water Drainage Technical Note, Ref: 8180891/CS/CS/018, Issue: 17 November 2020, prepared by Glanville

Following our letter dated 01 September 2020 the applicant submitted the following additional information in support of the application:

- Surface Water Drainage Technical Note, Ref. Ref: 8180891/AP/DW/017, Issue: 28 September 2020, prepared by Glanville

We previously reviewed the following information in support of the application:

- Flood Risk Assessment and Drainage Statement, Ref: TR8180891/SH/DW/016, dated 11 June 2020, Issue 4, prepared by Glanville
- Soil Infiltration Tests, Ref: JB/18-276.01/SIT-1, dated 25 October 2018, prepared by Aviron Associates Limited
- Groundwater Standing Level Monitoring, Ref: JB/18-276.02/GW-1, dated 7 November 2018, prepared by Aviron Associates Limited

Following a review of the additional information submitted, we can make the following comments regarding each of our previous objection points. The LLFAs previous comments are shown in italics, with additional comments on the latest submitted information following each of these.

1. Feasible surface water discharge mechanism

This point can be broken down into two aspects: a) groundwater and the use of infiltration techniques and b) the proposed discharge from the attenuation basin into the ditch and its ultimate discharge point.

Groundwater

Regarding our previous comments in relation to the high groundwater level found on site and the proposal for the permeable paving to infiltrate, the applicant has proposed an alternative scheme which converts permeable driveways within the site to impermeable.

To clarify, as LLFA, we would expect permeable paving to still be provided but for the sub-base to be lined, allowing for surface water to be attenuated within the sub-base, with the use of perforated pipes to collect the surface water and the area accounted for within the wider drainage strategy.

The general principle which the applicant is proposing "The attenuation basin has been re-sized to accommodate the additional runoff from what were previously 'permeable' areas draining to ground" is appropriate, however permeable paving (lined if a 1m buffer between the groundwater table is unachievable) is needed to ensure source control within SuDS and adequate management and treatment is provided. An overall impermeable paved solution would not be acceptable and lined permeable paving with sub-base should be used. In addition, we previously requested further clarification regarding why the access road was also not proposed to be of permeable paved construction. Please see additional comments below.

The applicant has changed the drainage design such that private driveways have been amended to be permeable surfaces, with lined subbases which subsequently discharge into the wider site drainage network. At paragraph 3.5 the applicant has stated how the access road will not be of permeable construction. As LLFA we do not agree that there is less pollution coming from the access road. However, please see comments under adequate management and treatment below.

The applicant has stated how should groundwater levels be found to be greater than 1m below the permeable paving sub-base formation levels, infiltration would be considered. The LLFA would comment that if after detailed groundwater monitoring over a period of months groundwater was found to be deep enough such that a 1m buffer could be obtained, this would be acceptable providing that BRE Digest 365 compliant infiltration tests were undertaken at the final location and depth of the proposed infiltration; the plane of infiltration. If proven, this would allow driveways to infiltrate to the ground. However, considering current groundwater monitoring levels this would unlikely be achievable. Therefore, the driveways would need to be included as part of the wider attenuation provisions for the site; this is the current submitted drainage proposal. The applicant has shown permeable paved driveways with lined sub-base at Appendix C of the technical note, showing an updated Drainage Strategy drawing. We are pleased to see that lined

permeable paving has been included. Please see further comments regarding permeable paving and contributing area later in this letter.

With regards to the private driveways, this point has been addressed. However, we still have wider concerns regarding the potential for groundwater on site. We would suggest a detailed period of groundwater monitoring by way of condition. In response to our previous comments, the applicant has begun groundwater monitoring on site and has included the first reading from 10 November 2020 within Appendix H of the technical note. This shows groundwater to vary between 0.89m bgl to 2.08m bgl with three other locations reading 1.00m bgl, 1.14m bgl and 1.49m bgl. This shows groundwater to be close to the ground level in the context of the sub-base of the permeable paving. Within the information to be submitted to satisfy any groundwater monitoring condition the applicant should also provide the locations where the groundwater monitoring is being undertaken. We would expect this to be distributed around the site, including where the basin is proposed.

Ditch

The applicant has provided some additional information regarding the proposed outfall location into the ditches. These ditches run along the northern and north eastern boundaries of the site. The applicant has stated how they have produced a "3D model of the existing ground was generated using the topographical survey to better understand and illustrate the overall topography of the existing terrain. The model shows that the site slopes in the north-westerly direction towards an existing headwall and outlet eventually discharging into the Grand Union Canal located approximately 10m to the north of the headwall." The applicant has confirmed that these ditches are within the ownership of the applicant.

From a review of the flow route plan submitted by the applicant, the applicant is proposing to discharge from the basin to the most northern corner. This is in "the middle" of the ditch. This also requires pumping due to site levels. We would request that the applicant clarifies why a gravity discharge has not been sought at a different location.

We do still hold a number of concerns regarding the proposed discharge method from the site. Please see further comments below.

The applicant has undertaken a CCTV survey. From a review of the CCTV survey *pictures, the applicant has shown a photograph of the CCTV survey camera at the outfall; this is submerged under water in the Grand Union Canal.*

We would have concerns regarding the overall purpose of this connection, if it is indeed an outfall from the field ditches, or if the field ditches serve as an overflow for the canal. It is noted how there is an annotation on the Indicative Surface Water Drainage Strategy drawing how "Drainage route confirmed although location of headwall / pipework is approximate. Headwall flows downstream into the canal". However, we have seen drainage features associated with the Grand Union Canal such as pressure siphons on

canals where water does in fact go back the other way once the water level in the canal has reached a certain level.

Whilst we are pleased the applicant has undertaken further investigatory work into the field ditches, this does lead to the need for additional points of clarification regarding the suitability of this discharge point.

In order to satisfy the Non-Statutory Technical Standards, the outfall needs to be available during the 1 in 30 year event. With the fact that this is a navigable waterway with water maintained throughout, and the outfall is submerged, we cannot be sure that the site will be able to be positively discharged. The applicant will need to confirm that the outfall will be available during the 1 in 30 year event.

The pumped discharge point is at the most northern extent of the site. There is a note on the drawing which states "Unable to Survey – overgrown / ditch. Possible outfall location to Canal". This is then potentially a second connection to the Grand Union Canal. We therefore hold the same concerns as detailed above.

As LLFA, we are of the view that these are field ditches and are not a mapped ordinary watercourse. They are private and the applicant has stated are within their ownership. They are therefore proposed to be part of the drainage system for the site, with the final positive discharge point therefore into the Grand Union Canal. We would therefore regard the outfall / connection into the Grand Union Canal as the final discharge point from the site. The applicant will therefore need to gain permission from the Canal and Rivers Trust (CRT) for the proposed discharge into the Grand Union Canal.

The applicant will also need to demonstrate that the site is able to be positively discharged during the 1 in 30 year event and has provision for the attenuation requirements necessary for any additional storage required. As this is a navigable waterway, it is acknowledged that the applicant may not be able to confirm the levels (though full details and justification will need to be provided). If this is not able to be provided, or the site is only able to discharge under pressure (the outfall needs to be surcharged), the applicant will need to demonstrate that additional measures are put in place to ensure it's not backing up and there is enough storage within the system. This may mean that additional surface water storage needs to be provided, over and above what is currently being provided, to ensure that the site can hold multiple events on site and then discharge once the outfall is available.

We would also suggest the CRT are contacted regarding if they have any knowledge about the drainage features or connection into the canal. Their permission is also needed, as detailed above.

Reiterating our previous comments, a feasible surface water discharge mechanism is fundamental and is necessary to be provided prior to approval at planning.

The applicant has undertaken additional topographical survey of the site. This survey is focussed on the ditch, the headwall of the ditch, the canal towpath itself (leading under the bridge where Tring Road goes over the Grand Union Canal), and the connection between the ditch and the Grand Union Canal.

With regards to the connection between the ditch and the Grand Union Canal, the further survey undertaken by the applicant shows that the outfall into the canal is in a different location to the approximate location shown in previously submitted information. The connection into the canal looks to be under Tring Road bridge or just as the road goes over the canal, rather than into the side of the lock as shown previously. This is in accordance with the direction that was observed on site by the LLFA. The applicant has stated: “The further survey (included in Appendix B) shows that the outfall pipe from this ditch does drop a significant distance into the canal (1.24m). The invert level of the ditch on-site is also 0.50m above the towpath level.” We would highlight that this must be in reference to the towpath as it steps down in a westerly direction under Tring Road bridge, rather than the towpath adjacent to the site; on its northern boundary, which is elevated to the site. In reference to the actual outfall from the ditch, this is a considerable drop at 1.24m, please see below comments.

We previously raised concerns that the outfall would need to be available during the 1 in 30-year event, to ensure that the site can meet the non-statutory technical standards. This was in reference to the potential for the outfall to be flood locked due to water levels in the canal. The applicant has stated how: “due to the levels difference between the ditch on-site and the outfall to the canal, flows from the ditch are under significant pressure head and therefore positively discharge into the canal, as they would in the future”. As there is a 1.24m drop from the level recorded at the invert level of the ditch and the level recorded into the canal, this is a significant fall and would lead to a large head of pressure; therefore, expected to discharge. The applicant has also provided further information with regards to the drainage calculations for the 1 in 30-year event, the applicant has stated how two 1 in 30-year events could be accommodated within the basin. With regards to consecutive events, we would expect the applicant to provide half drain down times with 24 hours for the 1 in 100 year plus climate change event. This should be clarified by way of condition.

With regards to the need to pump from the basin into the ditch, as LLFA, we previously queried why discharge could not be achieved via gravity, as pumping is a less sustainable option, with a rigorous maintenance regime needed for the pump to ensure discharge can be maintained. The topographical survey shows that the ditch levels in comparison to the basin levels are such that the basin cannot discharge via gravity. The justification provided by the applicant is acceptable. The applicant has provided some further details and stated that: “The further survey (included in Appendix B) shows that the outfall pipe from this ditch dropping a significant distance into the canal (1.24m), and as such there is a theoretical possibility of a gravity connection however we do not consider this to be feasible - on a number of grounds. A gravity connection would involve significant levels changes to the ditch (lowering it in excess of 1m) and works to adjust the outfall pipe would be required within the Canal and River Trust’s land…” As LLFA, we would also

consider lowering of the ditch by 1m to not be appropriate. This would also remove the head of pressure required to discharge into the canal. In summary, the applicant should provide a maintenance plan for the pump as part of the information to be submitted at discharge of condition stage.

With regards to the location of the outfall headwall into the ditch, the applicant has moved this to be located further along the northern most ditch. This is acceptable; however, we would not expect the outfall to the ditch to be installed at a right angle. The headwall should be installed in line with the direction of flow and appropriately installed to ensure erosion control. Currently the connection to the ditch looks to be at a right angle, which could lead to erosion problems. The applicant will need to confirm this as part of the detailed design. Please see below "Informative to the applicant/LPA" in relation to ordinary watercourses. Please also see below comments in relation the ditches and comments following the applicant's response to the LLFAs addendum letter dated 28 October 2020.

2. Detailed drainage plan and detailed drainage calculations

The applicant has provided additional details regarding the storage volume to be provided within the attenuation basin. This has been confirmed at 372.06m3. This breaks down to a total required storage volume for the site calculated as 294.80m³. The basin provides storage volume of 299.24m³ with 300mm freeboard. 62.50m3 of emergency storage has been allowed for within the first 150mm of freeboard.

We would normally expect full network modelling to be provided in support of a full planning application. The applicant has provided storage calculations.

Some addition drawing details have also been provided to address this point.

Whilst the applicant has provided volumes of storage within the basin, the applicant should clarify the depth of the basin. There is the potential for groundwater ingress into the basin, compromising the surface water storage able to be provided on site. The basin will therefore need to be lined. There is also the potential to displace groundwater with the installation of the basin.

Modelling will need to be updated in line with any changes to the drainage strategy.

The applicant has provided MicroDrainage modelling at Appendix C of the Technical Note. This has been provided for the 1 in 30 and the 1 in 100 year + 40% for climate change. We would normally expect detailed modelling for all events, to also include the 1 in 1 and the 1 in 100, in addition to what has been provided. However, as the applicant is managing the volumes for the 1 in 100 year +40% for climate change event, this is acceptable to show the volumes to be managed at this stage. However, as part of any discharge of condition all events should be provided.

From a review of the modelling provided and the Indicative Surface Water Drainage Strategy, Drawing No. 8180891_SK05, Rev. P3, dated 12/11/2020, prepared by Glanville. We would have some concerns how the system has been designed. We are pleased to see that the model results show that there is no flood volume leaving the system, however, the system is surcharging. This is likely caused by the fact that the outfall of the pipe network into the basin is at the base of the basin, so as the basin fills, the system backs up into the pipes before it fills the basin. As there is no flood volume exiting the system, as LLFA we are happy that the system will work, however, as part of the detailed design we would suggest the applicant looks to explore if the outfall from the pipe system is raised, and not installed at the base of the basin.

With regards to the potential for groundwater ingress into the basin, the applicant has stated how “the basin will be lined to prevent groundwater ingress. At detailed design stage floatation calculations and a groundwater impact assessment will be carried out if necessary. This will be informed by detailed groundwater monitoring...” We are pleased to see the applicant has begun groundwater monitoring, which will be used to inform the detailed design, and we would expect to see these details as part of the discharge of a pre-commencement condition.

The applicant has stated how “a low flow channel has been introduced into the basin to further improve water quality and provide an improved aesthetic for the basin during low flow events. This would not require any amendment to the basin levels or footprint, and as such could be provided without affecting the capacity of the basin.” The applicant has provided a typical section of this low flow channel in the Typical Drainage Details, Drawing No. 8180891_SK07A, Rev. P1, dated 16/11/2020, prepared by Glanville. This low flow channel is constructed in the form of a filter drain material. We would expect the final detailed drawings including cross section and long section and final location and route of the low flow channel within the basin itself to be included within the final detailed engineered drawings to be submitted at discharge of condition stage.

As requested previously, the applicant has detailed the volumes of storage within the basin at given water levels in the Indicative Surface Water Drainage Strategy Drawing No. 8180891_SK05, Rev. P3, dated 12/11/2020, prepared by Glanville. This shows that 350mm of freeboard is being provided. The basin depth is 1.3m (top level minus base of basin, which is different from the 1.37m stated on the annotation), with a storage volume of 299.24m3 whilst maintaining the 350mm freeboard. As above, we would expect the final detailed drawings to be submitted as part of discharge of condition.

From a review of the Hydraulic Model Catchment Plan, Drawing No. 8180891_SK08, Rev. P2, dated 12/11/2020, prepared by Glanville, regarding the contributing area, we would comment that not all impermeable / hardstanding areas are contributing to the drainage system, which they should be; there are some footpath areas and other areas which should be incorporated. As part of the detailed design we would expect all footpaths, sheds, garages, bin stores as well as any other hardstanding areas or positively drained areas to be included within the contributing area and the area to be positively drained by the drainage system. One example is the footpath around plot 1, plots 22-23 and plot 28.

The applicant should also include the basin itself within the area contributing to the drainage system. These additions may require additional storage to be provided on site, the applicant will be able to provide some additional storage within the sub-base of the permeable paved driveways, however, additional storage, such as a permeable paved / permeable tarmacked access road with sub-base would also help provide additional storage. Regarding the contributing area, these areas should be incorporated within the information submitted as part of the detailed design.

3. Adequate management and treatment of surface water

Regarding management and treatment of surface water from the access road, we would reiterate how "deep-trap gullies and catch-pits" do not provide adequate treatment of surface water.

The level of treatment able to be provided within the attenuation basin will be based on its design. If forebays, low flow channels, split basin or other aspects are included within the design, this may demonstrate that adequate treatment is being provided. However, the current indicative basin would not provide this. However, any modifications to the basin would reduce the volume, we would therefore recommend lined permeable paving with sub-base is used.

Regarding the use of impermeable paved construction under point 1, this would also not be acceptable. The applicant should be using lined permeable paving for all hardstanding.

With regards to the main access road, this is still proposed to be of impermeable (tarmac) construction, with private driveways proposed to be of permeable paved construction. Therefore, for the access road, this does not provide any management and treatment of surface water until it gets to the basin. The applicant has introduced a low flow channel within the attenuation basin. Nevertheless, we would still question why source control SuDS measures are not included for the road drainage. The current proposed piped to basin solution is not the most sustainable, and we would expect the applicant to address this with the exploration of additional source control measures to be provided as part of the detailed design. A traditional piped gully collection system is less sustainable; taking surface water underground means that gullies need to be cleaned out on a regular basis, whereas on surface SuDS features such as permeable paving can be seen and maintained easily on surface.

Additional comments

Within out previous additional comments we highlighted how: *Specifically, the applicant will need to contact the Canal and Rivers Trust to obtain permission to continue to use the connection into the Grand Union Canal. This is required due to change from it's use as land drainage to now providing for discharge from a residential development.*

The applicant has now confirmed that the Canal and Rivers Trust (CRT) do not have any objection for the continued use of connection to the canal. This is provided at Appendix

D of the Technical Note. The CRT in their letter to the LPA state how “Thank you for clarification that the ditch does outfall into the canal. The Trust confirm that the detail provided is acceptable and we are please to note that ditch and headwall will be cleaned out and maintained in the future”. As LLFA we are pleased to see that this discharge method is acceptable to the CRT.

Comments in relation to the LLFAs addendum letter dated 28th October 2020
Following a site visit undertaken by the LLFA we issued an addendum letter, which contained a number of points, some of which have been addressed within the analysis of the above. However, please see brief comments below.

Onward connection – Connection into the Grand Union Canal?

This has been addressed and analysed within our comments to point 1 *Ditch* above.

On-site field ditches

We detailed concerns regarding the potential area draining to the ditches, and therefore the ditches drainage function in a wider site context.

The applicant has undertaken a catchment assessment using the FEH catchment boundary and the potential volume of water being drained by the ditches. The applicant has stated how “The FEH website indicates that a catchment of approx. 0.648 km2 of area feeds the aforementioned ditches. This sub-catchment is part of a larger catchment of approximately 4.34km2.” The applicant has calculated a peak flow rate of 0.477m3/s or 477l/s for the 1 in 100-year event. This is potentially a considerable flow entering the site, though the ditches are of reasonable size. Nevertheless, we would recommend that this is analysed in further detail, to understand this in the context of the capacity of the ditches, to ensure this can be contained within the ditch network and managed on site.

Site Flooding and Groundwater
Within information previously analysed, the applicant will be undertaking detailed groundwater monitoring on site. This should assist in the analysis of any potential groundwater flood risk to the site, which will need to be clarified by way of condition.

With regards to surface water flood risk, the applicant has analysed LiDAR DTM data to show the likely depressions on site, where surface water has the potential to pond. The Environment Agency’s Risk of Flooding from Surface Water mapping shows that the site is at a low risk of surface water flooding.

The introduction of a positive drainage system on site should aid in capturing and managing any surface water more positively. In order to mitigate any further risk, the applicant has also stated how they will be raising ground and finished floor levels by 300-500mm as standard.

LLFA position
On the basis that the applicant agrees to address any outstanding clarifications as part of the detailed design and agrees to the below pre-commencement condition, as LLFA we can advise the LPA we can remove our objection on flood risk grounds.

In order to secure the final detail of the drainage scheme, we therefore recommend the following conditions to the LPA should planning permission be granted.

Condition 1

The development permitted by this planning permission shall be carried out in accordance with the Surface Water Drainage Technical Note, Ref: 8180891/CS/CS/018, Issue: 17 November 2020, prepared by Glanville and the Indicative Surface Water Drainage Strategy Drawing No. 8180891_SK05, Rev. P3, dated 12/11/2020, prepared by Glanville and the following mitigation measures:

1. Limiting the surface water run-off rates to a maximum of 6.8l/s for all rainfall events up to and including the 1 in 100 year + climate change event with discharge into the ditch on site before ultimate discharge into the Grand Union Canal.

2. Provide attenuation to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + climate change event.

3. Implement drainage strategy utilising lined permeable paving with sub-base, attenuation basin with low flow channel and flow control with pumped discharge.

Reason - To reduce the risk of flooding to the proposed development and future occupants.

Condition 2

No development shall take place until the final design of the drainage scheme is completed and sent to the LPA for approval. The surface water drainage system will be based on the submitted the Surface Water Drainage Technical Note, Ref: 8180891/CS/CS/018, Issue: 17 November 2020, prepared by Glanville and the Indicative Surface Water Drainage Strategy Drawing No. 8180891_SK05, Rev. P3, dated 12/11/2020, prepared by Glanville. The scheme shall also include:

1. Detailed groundwater monitoring over a minimum period of 6 months over the autumn and winter, ideally to be provided for the entire calendar year. If the site is found to be impacted by groundwater, an assessment of this flood risk and its mitigation should be provided. Details on how the site drainage features will be secured against groundwater should also be provided.

2. Provisions for maintenance of the ditches to ensure their suitability for conveyance of the site discharge to the canal.

3. Provision of a detailed catchment assessment of the ditches / potential ordinary watercourses, ensuring effective management of this risk.

4. Full CCTV survey and condition assessment of the connection between the ditch and the Grand Union Canal, along with any maintenance or remedial works.

5. Detailed engineered drawings of the proposed SuDS features including their location, size, volume, depth and any inlet and outlet features including any connecting pipe runs and all corresponding calculations/modelling to ensure the scheme caters for all rainfall events up to and including the 1 in 100 year + 40% allowance for climate change event, with a supporting contributing area plan.

6. Demonstrate appropriate SuDS management and treatment for the entire site including the access road. To include exploration of source control measures and to include above ground features such as permeable paving and a complex attenuation basin.

7. Provision of half drain down times within 24 hours.

8. Exceedance plan for events greater than the 1 in 100 year plus 40% for climate change event.

Reason - To prevent flooding by ensuring the satisfactory storage of and disposal of surface water from the site

Condition 3

Upon completion of the drainage works for the site in accordance with the timing / phasing arrangements, the following must be submitted to and approved in writing by the Local Planning Authority:

1. Provision of a verification report (appended with substantiating evidence demonstrating the approved construction details and specifications have been implemented in accordance with the surface water drainage scheme). The verification report shall include photographs of excavations and soil profiles/horizons, installation of any surface water structure (during construction and final make up) and the control mechanism.

2. Provision of a complete set of as built drawings for site drainage.

3. A management and maintenance plan for the SuDS features and drainage network.

4. Arrangements for adoption and any other measures to secure the operation of the scheme throughout its lifetime.

Reason - To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site.

Informative to the LPA / Applicant

We request that the LPA inform the LLFA if planning permission is granted, as we as LLFA will undertake an assessment of the ditches on and around the site to determine if they should be classified as ordinary watercourses; this also includes the ditch alongside Tring Road, at the proposed site access. As a result of this assessment, if the ditches are determined to be ordinary watercourses, the construction of the proposed outfall headwall into the ditch, along with any modifications to the ditch as a result of the site entrance will require prior written consent from the Lead Local Flood Authority (Hertfordshire County Council) under the Land Drainage Act 1991.

Land drainage consent is needed regardless of any planning permission. For further guidance on ordinary watercourses please see our ordinary watercourses webpages:

https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/ordinary-watercourses/ordinary-watercourses.aspx

We would recommend the LPA obtains a management and maintenance plan, to ensure the SuDS features can be maintained throughout the development's lifetime. This should follow the manufacturers' recommendation for maintenance and/or guidance in the SuDS Manual by Ciria.

It is acknowledged that this application follows an earlier submission by Rectory Homes on the southern part of the site for a development of 15 dwellings (9 x 2-bed houses and 6 x 3-bed houses) with associated access, car parking and landscaping. The applicant has detailed within the FRA how the application number in respect of this earlier application is 4/00024/19/MFA. As LLFA we were not consulted on the other application at this site. We would therefore request that the LPA has regard of the comments made in this letter in relation to the earlier application at this site.

Additional Conditions

The conditions requested by the LLFA are considered to be reasonable and necessary in order to prevent flooding of the proposed dwellings and those neighbouring units. As such these shall be added to the drafted conditions as set out above.

Recommendation

As per the published report.

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Item d

20/01403/ROC Variation of Conditions 2 (Aproved Plans) 3 (Landscape works) 5 (Fire Hydrants) attached to planning permission 19/02793/ROC (Variation of Condition 2 (approved plans) attached to planning permission 4/01684/18/FUL (construction of two detached houses) providing for the re-siting of the forward projection of Plot 1 to the north-west and minor alterations to the fenestration of both Plot 1 and Plot 2.)

Land To Rear Of 7 And 9 Anglefield Road Berkhamsted Hertfordshire HP4 3JA

Additional information received from Applicant:

Written arboricultural advice from Patrick Stileman (dated 27-11-20).

1. Land to the rear of 7 & 9 Anglefield Road in Berkhamsted has planning consent for the construction of two new dwellings, with access to the site gained via The Oaks, off Cross Oak Road. The planning reference is 4/01684/18/FUL.

2. I assisted the developer (EJ Waterhouse) with the planning application through the production of an initial Tree Survey Report and subsequently with a Tree Protection Plan setting out how retained trees shall be protected during the construction process.

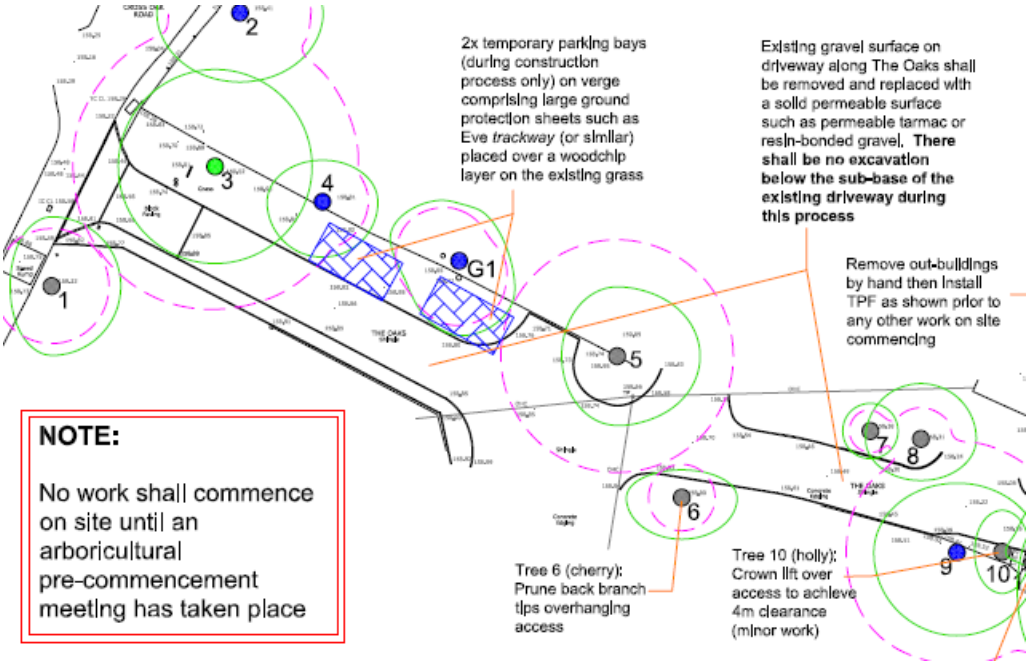
3. The site has since been sold and I am now engaged by the new owners. I prepared an updated Tree Protection Plan in May 2020 (drawing ref DS31101501.03-A) and provided further advice in October 2020 setting out how electricity and gas utilities should be installed via The Oaks using methods to avoid causing harm to trees.

4. I am advised that the Site Management Plan for The Oaks requires that the existing surface of The Oaks, which comprises loose gravel, is replaced with a resin bonded gravel surface.

5. At the time of preparing a Tree Protection Plan details of the new road surface had not been provided. There are mature trees adjacent to the driveway, in particular a mature oak close to Cross Oak Road (Tree 3) a mature ash tree along the boundary with 121 Cross Oak Road (Tree 5) and an off-site sycamore close to and south of the entrance into the site (Tree 9). These trees are shown on the extract of the Tree Protection Plan included below.

6. In the absence of detailed plans for the new road surface I added a prohibitory note to the Tree Protection Plan submitted with the planning application which states '*Existing gravel surface on driveway along The Oaks shall be removed and replaced with a solid permeable surface such as permeable tarmac or resin-bonded gravel.* ***There shall be no excavation below the subbase of the existing driveway during this process****'*. Below, I have copied an extract of the Tree Protection Plan submitted with the planning application which shows this.

Extract from Tree Protection Plan submitted with planning application



7. I met Michael Matfin on site on 17th November 2020 who told me that having received advice regarding the construction depth necessary for the construction of a resin-bonded gravel driveway he is unable to comply with the prohibition that I had shown on the Tree Protection Plan, and he instructed me to prepare brief written advice to explain the situation from an arboricultural perspective based on the information that I have been provided.

8. The sub-base referred to on the Tree Protection Plan note relates to the compacted layer (usually comprising crushed aggregate (such as 'MOT Type 1') on which driveways are formed. The sub-base is generally an inhospitable environment for root development and it is unlikely that roots will have developed in this layer. For this reason, removal of the gravel and most of the sub-base would be acceptable; however disturbing ground below the sub-base risks causing damage to tree roots.

9. An initial assessment on site which involved me scraping away the gravel surface indicated
that the driveway has not been formed over a compacted sub-base and that its make-up is shallow in nature - potentially no more than 100mm.

10. Rob Waterhouse, of EJ Waterhouse, has advised Michael Matfin by email that he has recently established the required construction depth to create a stable base for a resinbonded
gravel surface to be a minimum of 420mm.

11. If the ground along the driveway is excavated to a depth of 420mm in my assessment this would extend significantly into the rooting zone of the three trees described in 5. and has the potential to cause significant damage and long-term harm to them. The majority of tree roots are typically located within the upper 500mm of the soil, and excavation to the depth specified as being necessary has the potential to sever a significant proportion of the roots and this in turn could cause harm to both the physiological and structural function provided by roots thus causing harm to the trees.

12. There are ways of constructing new driveway surfaces using methods of 'no-dig' – usually as a three-dimensional cellular confinement system (for example Geosynthetics 'cellweb') in which cells are laid over the surface, with the cell depth determined by the loading that it must bear. Given that this driveway could potentially have heavy trucks on occasion it's likely that a cell depth of around 250mm would be required (TBC by product manufacturer) with the depth of the final surface additional to this.

13. At The Oaks, if the gravel were removed, at this stage it appears that this might still require a raising of the levels by some 250mm relative to the existing level in order to avoid extending into the ground where roots will exist. I have been advised that this would not be acceptable primarily because the change in level cannot be accommodated by the existing properties along The Oaks (opposite Trees 5 and 9) whose driveway levels are fixed to that of The Oaks.

This completes my advice to date.

<u>Supporting letter from MTC Engineering (dated 10-12-20).</u>

We write with regards to the above proposal and the proposed retention of the existing shared gravel driveway, known as The Oaks. It is to our understanding that the four residents residing at The Oaks, Berkhamsted who already have access off the driveway have objected to the retention of the existing gravel driveway in replacement for a new hard surfaced bonded resin finish which was agreed under the original application and previous developer (EJ Waterhouse).

Written advice from the Arboriculturist (Patrick Stileman) has confirmed there to be mature trees adjacent the driveway. These trees are protected and are shown on the attached written advice November 2020 by Patrick Stileman.

The advice confirms there shall be no excavation below the sub-base of the existing driveway and a solid surface will need to be a permeable tarmac or a resin-bound permeable surface. On site investigation shows the existing surface to be approximately 100mm thick.

A typical specification for a resin bound surfacing system would consist of the following (Clearstone Spec Attached):

18mm thick Resin Bound Permeable Surface

40mm minimum Binder Course
100mm minimum Base Course
300 minimum Sub-base

Total thickness 458mm to create a stable base for a resin bound permeable surface. This would extend significantly into the rooting zone of the trees described in the Arboriculturist report attached and would have the potential to cause significant damage.

The Tree Protection Plan is an approved plan and works on site must adhere to it.

The only option would be to scrap out the existing 100mm layer and construct the proposed road surface which would raise the site levels to approximately 358mm higher than existing levels. I have been advised that this could not be accommodated on site due to constraints with access to the existing properties and would create steep accesses down to the existing properties adjacent The Oaks and potential issues with water flooding the front of these properties with adequate drainage installed to deal with new levels and regrading.

These works required to the individual driveways off The Oaks would be down to land owner's responsibility which would include resurfacing, regrading and drainage installed.

A proposal sent by the residents that the road could be laid 250mm thick would not be recommended due to the increased maintenance risk and a low life expectancy. Although there will be contractors comfortable to lay the road with a sub-base of 100mm thick Type 3 material which could potentially lead to increased maintenance costs and resurfacing works compared to the current drive which is relatively low-key maintenance.

Due to the roots from the existing trees, there would be significant movement under the road which would impact the surface material which could possibly require maintenance work every 5-7 years. With the resin bound material it can never be patched in with works required to cut out sections and replace with the colour never matching. Average cost of the surface material is £55 per square metre which would need to be considered when making a final decision on the works.

Block paving would be an option but would pose similar risks with a similar make up of around 450mm thick or 350mm stone, 80mm block and a 50mm laying course. Again, is the sub-base was reduced then increase movement within the blocks increasing the maintenance risk.

<u>Example of roadway and supporting text</u>

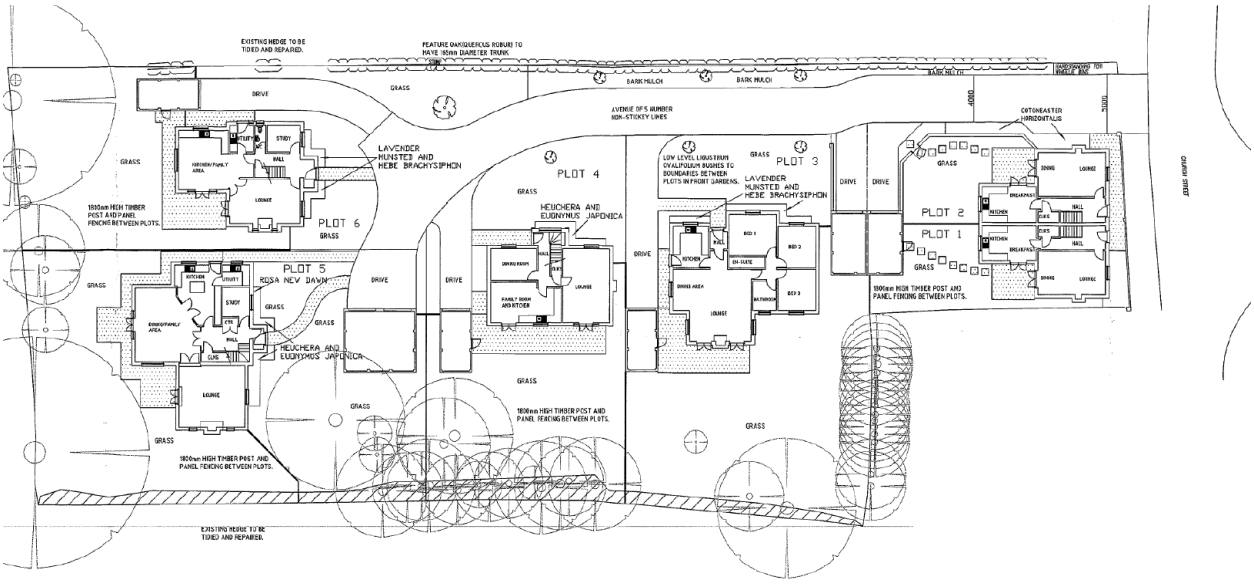
5 Cinders Close Needingworth St Ives PE27 4TZ

The accompanying site plan and photographs of 5 Cinders Close Needingworth St Ives PE27 4TZ show a roadway similar to The Oaks Berkhamsted.

This roadway serves 6no. dwellings which are relative modest in terms of the number of bedrooms and occupants and thus vehicular movements.

The below ground conditions here are perfect for construction solid gravel with fine sandy soil but despite this there are cracks and puddling through and the surface bonding is a constant maintenance headache for the owners.

It was last repaired a few years ago but no one in the cul-de-sac wants to pay for it to be further repaired as they have been advised that the whole top layer needs to be taken off and then re-laid!!



Full set of photographs can be found on the Dacorum website.

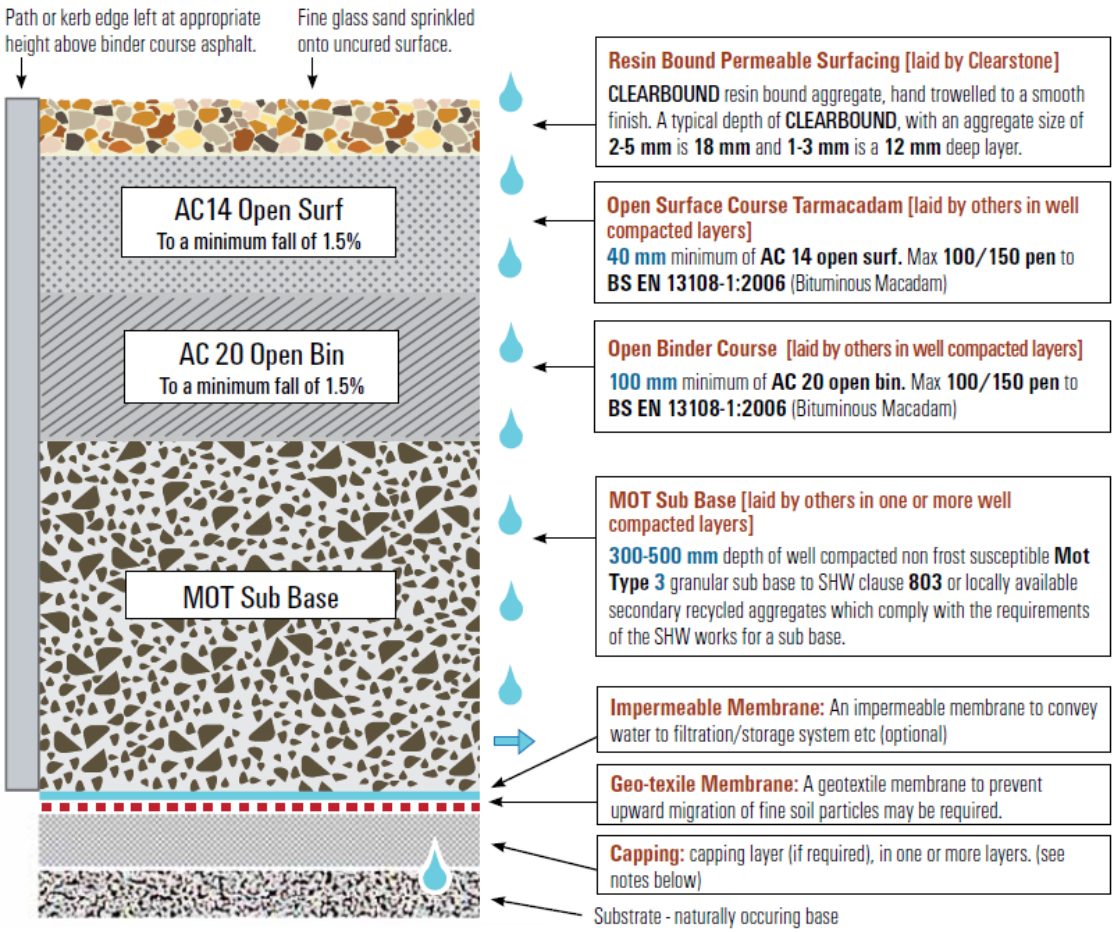
Clearstone resin bound surfacing specification sheet

Clearstone® resin bound surfacing

Specification Advice for **CLEARBOUND**
resin bound surfacing system (surface dressing)
Tel: 01273 358 177 www.clearstonepaving.co.uk

Spec 3.

Permeable Public Car Park/Access Road & SuDS compliant



*** * * Please note: New asphalt and concrete surfaces need a minimum of two weeks curing time, before resin bound paving can be laid upon it * * ***

Planning Permission SuDS: Resin bound surfacing creates an attractive, permeable and durable surface which avoids the need for planning permission under the 2008 SuDS Planning Order 1998 on the paving of front gardens. **Notes:**

- If there is a probability of standing water, then this may soften the substrate, therefore a nominal fall to an out-fall or soakaway should be considered.
- If water recycling is a requirement then an impermeable membrane should be used in conjunction with a water harvesting system
- Areas that could be trafficked by heavy vehicles should have layers designed according to Highways Agency requirements.
- If the substrate is silty, then this may need to be stabilised or partially removed and replaced with sub-base/ granular capping, in accordance with Highways Agency design manual for roads and bridges.
- The maximum deviation of the binder course should not exceed 3mm under a 1m straight edge.
- Total sub-base thickness will be dependant on expected loading, water storage capacity, and sub-base strength.
- This specification is based on normal good practice for resin bound surfacing, and does not absolve the specifier from designing a base construction suitable for the expected loadings of traffic and ground conditions existing on a given site.

Updated September 2018 v7

BBA Agrément Certificate Number 18/5548
CLEARBOUND
BBA approved resin bound surfacing system

Disclaimer: Whilst Clearstone Paving Ltd. endeavours to ensure that advice, specifications, recommendations and information given is correct, it cannot have control over how substrates constructed by others are done and will not accept liability, directly or indirectly, arising from poor workmanship.

Any advice, recommendation or information given by Clearstone Paving Ltd. is based on practical experience and is believed to be accurate at the time of publication, no liability or responsibility of any kind including liability for negligence is accepted in this respect by the company.

The figures quoted do not constitute a specification, they represent typical values obtained for the substrate of the product.

Product design and specifications are subject to change without further notice.

Acceditations & Memberships

Recommendation

As per the published report.

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Item e

20/02507/FUL Installation of 12 parking bays on amenity green in front of 7 to 9 Hasedines Road

Amenity Green Front Of 7 To 9 Hasedines Road Hemel Hempstead Hertfordshire HP1 3RA

Recommendation

As per the published report.

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Item f

20/02900/FHA Demolition of existing single storey boot room extension and revised replacement single storey boot room / utility on existing footprint with altered roof

Binghams Park Potten End Hill Water End Hemel Hempstead Hertfordshire HP1 3BN

Recommendation

As per the published report.

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Item g

20/02901/LBC Demolition of existing single storey boot room extension and revised replacement single storey boot room / utility on existing footprint with altered roof

Binghams Park Potten End Hill Water End Hemel Hempstead Hertfordshire HP1 3BN

Recommendation

As per the published report.

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Item h

20/00979/FUL Construction of new dwelling connected to existing semi-detached properties. External refurbishment of existing two properties (renewal of application 4/01574/17/FUL).

3 Grove Farm Cottage Marshcroft Lane Tring Hertfordshire HP23 5PP

Recommendation

As per the published report.

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Item i

20/03181/FHA Two storey side and single storey rear extensions and loft conversion.

3 St Katherines Way Berkhamsted Hertfordshire HP4 1DA

Response from the agent received on 25th November 2020

Please see my comments below in regards to the consultee and public comments in relation to plans DD 20/105.2A & DD 20/105.3A

Parish/Town Council:

As the site's permitted development rights are currently intact, the homeowners can convert the existing loft with a full flat width dormer within the existing loft (approved under 20/02449/LDP), as well as majority of the rear extension with prior approval.

Further to the changes made to the submitted plans, the first floor has been set in 1m from the boundary causing less intrusion and overbearing to the neighbouring property (1 Mortain Drive) and to prevent a terracing effect. The dormer has been set in 1m from either side of the flank walls and down from the ridge.

Public comments made 5th November onwards:

Dacorum Council previously approved a two storey side extension sat on the boundary with a front dormer to match the existing (4/01988/02/FHA).

The first floor extension would cause no additional harm to 3 & 4 Mortain Drive in regards to overlooking. The loft conversion will over look properties located to the rear of 3 St Katherines Way, however, the loft conversion and a large portion of the dormer can be constructed under PD. Therefore, requesting for the dormer to be extended by approx 1.4m with an additional window will not cause additional harm to what's currently approved under 20/02449/LDP.

The extension above the garage has been reduced/set in as noted above. The extension has been designed so it's in keeping with the dwelling, with materials to match, front dormer to mirror the existing but on a smaller scale, and rear dormer with cladding to match the front dormers.

The single storey rear extension would sit 11m from the rear elevation of 3 Mortain Drive. We can currently do a 3m extension under PD, and are requesting the additional 0.5m under the householder application. The patio extends approx. 1.5m allowing enough space to exit the dwelling and step down into the garden due to the topography of the site.

With regards to 1 Mortain Drive, the dwelling sits alongside their garage, having the first floor extension sit approx. 12.6m from the original dwelling of 1 Mortain Drive. The current hedges allows privacy, nevertheless, the flank wall of the garage/extension will also provide this. The hedges shouldn't overhang the boundary into 3 St Katherines Way, however, if the extension affects the hedges, the customers will need to confirm with the neighbours on how they plan to resolve the issue (pruning or replacing). The window located of the side elevation can be changed to be obscurely glazed and non-opening

below 1.7m off the finished floor allowing privacy in the bathroom and neighbouring properties.

Additional site photographs

Existing rear elevation

Existing rear boundary

View from existing first floor side elevation

Recommendation

As per the published report.

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