



Public Document Pack

# DEVELOPMENT MANAGEMENT AGENDA

**THURSDAY 28 NOVEMBER 2019 AT 7.00 PM**  
**DBC COUNCIL CHAMBER - THE FORUM**

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

For further information, please contact Corporate and Democratic Support on 01442 228209.

## **AGENDA**

### **1. MINUTES**

To confirm the minutes of the previous meeting (these are circulated separately)

### **2. APOLOGIES FOR ABSENCE**

To receive any apologies for absence

### 3. DECLARATIONS OF INTEREST

To receive any declarations of interest

A member with a disclosable pecuniary interest or a personal interest in a matter who attends a meeting of the authority at which the matter is considered -

- (i) must disclose the interest at the start of the meeting or when the interest becomes apparent and, if the interest is a disclosable pecuniary interest, or a personal interest which is also prejudicial
- (ii) may not participate in any discussion or vote on the matter (and must withdraw to the public seating area) unless they have been granted a dispensation.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Members' Register of Interests, or is not the subject of a pending notification, must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal and prejudicial interests are defined in Part 2 of the Code of Conduct For Members

[If a member is in any doubt as to whether they have an interest which should be declared they should seek the advice of the Monitoring Officer before the start of the meeting]

It is requested that Members declare their interest at the beginning of the relevant agenda item and it will be noted by the Committee Clerk for inclusion in the minutes.

#### 4. PUBLIC PARTICIPATION

An opportunity for members of the public to make statements or ask questions in accordance with the rules as to public participation.

Time per speaker	Total Time Available	How to let us know	When we need to know by
3 minutes	Where more than 1 person wishes to speak on a planning application, the shared time is increased from 3 minutes to 5 minutes.	In writing or by phone	5pm the day before the meeting.

You need to inform the council in advance if you wish to speak by contacting Member Support on Tel: 01442 228209 or by email: [Member.support@dacorum.gov.uk](mailto:Member.support@dacorum.gov.uk)

The Development Management Committee will finish at 10.30pm and any unheard applications will be deferred to the next meeting.

There are limits on how much of each meeting can be taken up with people having their say and how long each person can speak for. The permitted times are specified in the table above and are allocated for each of the following on a 'first come, first served basis':

- Town/Parish Council and Neighbourhood Associations;
- Objectors to an application;
- Supporters of the application.

Every person must, when invited to do so, address their statement or question to the Chairman of the Committee.

Every person must after making a statement or asking a question take their seat to listen to the reply or if they wish join the public for the rest of the meeting or leave the meeting.

The questioner may not ask the same or a similar question within a six month period except for the following circumstances:

- (a) deferred planning applications which have foregone a significant or material change since originally being considered
- (b) resubmitted planning applications which have foregone a significant or material change
- (c) any issues which are resubmitted to Committee in view of further facts or information to be considered.

At a meeting of the Development Management Committee, a person, or their representative, may speak on a particular planning application, provided that it is on the agenda to be considered at the meeting.

**Please note:** If an application is recommended for approval, only objectors can invoke public speaking and then supporters will have the right to reply. Applicants can only invoke speaking rights where the application recommended for refusal.

**5. INDEX TO PLANNING APPLICATIONS (Page 5)**

## INDEX TO PLANNING APPLICATIONS

<b>Item No</b>	<b>Application No.</b>	<b>Description and Address</b>
5a.	4/03266/18/MFA	<p>HYBRID PLANNING APPLICATION FOR MIXED USE PROPOSED DEVELOPMENT AT WEST HEMEL HEMPSTEAD, PURSUANT TO POLICY LA3 OF THE ADOPTED SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (2017) TO PROVIDE FOR UP TO 1100 DWELLINGS (WITH UP TO 40% AFFORDABLE HOUSING), COMPRISING FULL PLANNING PROPOSALS FOR 350 DWELLINGS AND OUTLINE PLANNING PROPOSALS (INCLUDING MEANS OF ACCESS) FOR 750 DWELLINGS. THE APPLICATION PROPOSING THE DEVELOPMENT OF UP TO 1100 NEW DWELLINGS (INCLUDING AFFORDABLE HOUSING), LAND FOR UP TO SEVEN PITCH GYPSY TRAVELLER SITE, TOGETHER WITH LANDSCAPING, ROADS, FOOTPATHS AND CYCLEWAYS, ECOLOGICAL MITIGATION, SUSTAINABLE DRAINAGE SYSTEMS, EARTHWORKS, PUBLIC OPEN SPACE, ONE NEIGHBOURHOOD EQUIPPED AREA OF PLAY (NEAP), TWO LOCALLY EQUIPPED AREAS OF PLAY (LEAP) AND A COMMUNITY GAMES AREA (CGA). A SITE FOR A PRIMARY SCHOOL AND ASSOCIATED NURSERY WITH PLAYING FIELDS ON SITE OF UP TO 2.1 HECTARES (INC. CGA), SPECIALIST ACCOMMODATION FOR THE ELDERLY WITH UP TO 70 ROOMS (C2 OR C3), A CONVENIENCE STORE OF UP TO 450 SQ. M(A1), THREE RETAIL UNITS EACH OF WHICH WOULD BE UP TO 100 SQ.M (A1,A2,A3,A4 AND A5), A COMMUNITY FACILITY OF UP TO 175 SQ.M (D1), A MEDICAL FACILITY OR OTHER USE OF UP TO 100 SQ.M (A1,C3 AND D1), A CHILDRENS DAY NURSERY OF UP TO 450 SQ.M (D1), A SHARED CAR PARK. THE FULL APPLICATION DETAILS WHICH ARE SUBMITTED COMPRISE OF - A NEW VEHICULAR ACCESS TO LONG CHAULDEN, A NEW VEHICULAR ACCESS EXTENSION FROM THE AVENUE, EMERGENCY ACCESS TO CHAULDEN LANE, NEW VEHICULAR ACCESS FROM CHAULDEN LANE SERVING ONLY THE LAND FOR UP TO A SEVEN PITCH GYPSY AND TRAVELLER SITE AND ACCESS TO A FOUL DRAINAGE PUMPING STATION, A FOUL DRAINAGE PUMPING STATION TO CHAULDEN LANE AND THE ASSOCIATED CONNECTING SEWER, THE CREATION OF THE FIRST PHASE OF 350 NEW DWELLINGS AND ASSOCIATED LANDSCAPING (INCLUDING AFFORDABLE HOUSING); TOGETHER WITH ASSOCIATED PUBLIC OPEN SPACE AND ASSOCIATED LANDSCAPING, ROADS, FOOTPATHS AND CYCLEWAYS, ECOLOGICAL MITIGATION, SUSTAINABLE DRAINAGE SYSTEMS, EARTHWORKS, AND ONE ASSOCIATED LOCAL EQUIPPED AREA OF PLAY (LEAP) LA3, LAND AT WEST HEMEL HEMPSTEAD</p>

# Agenda Item 5a

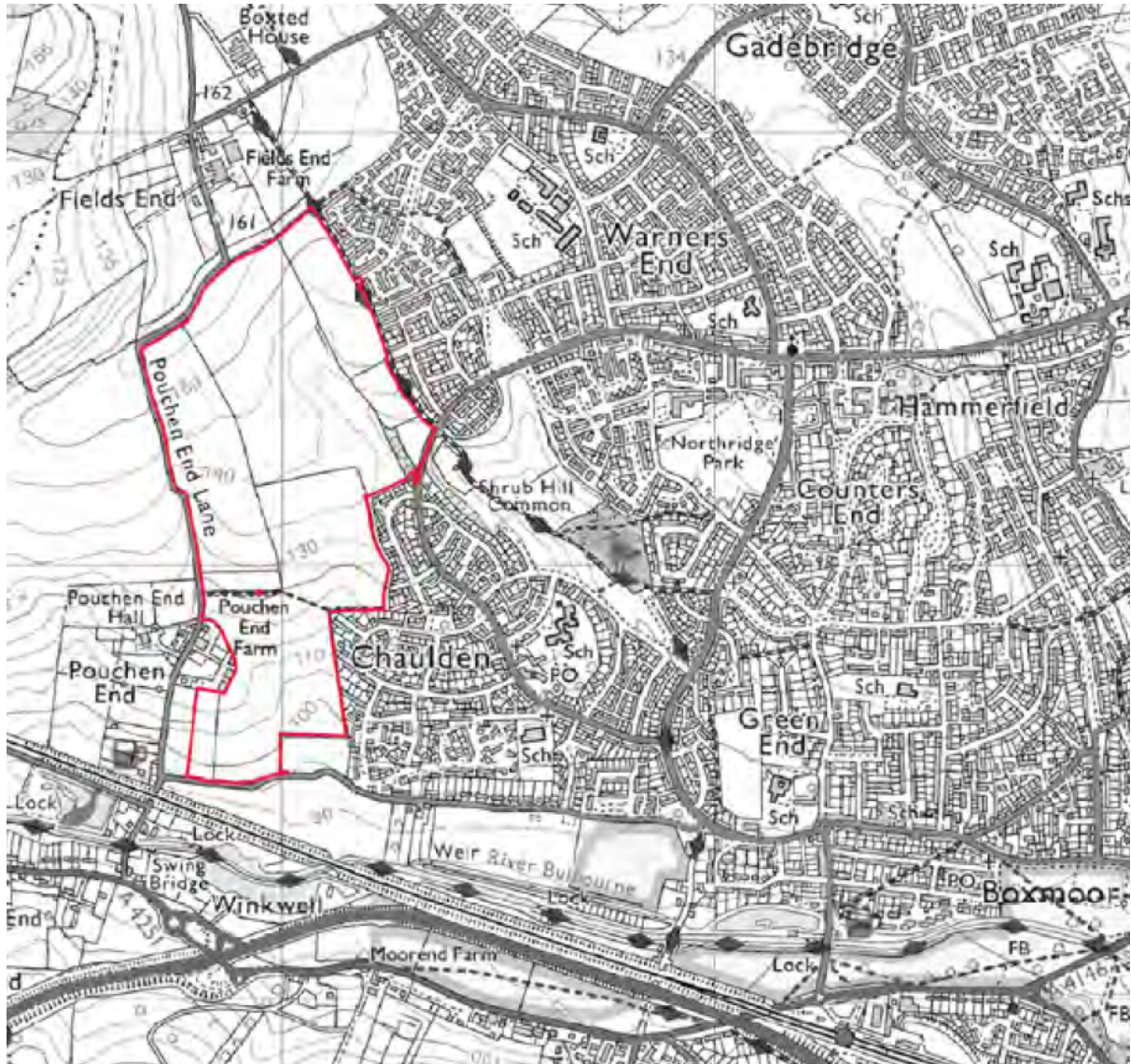
Item 5a      4/03268/18/MFA

Hybrid planning application for mixed use development at west Hemel Hempstead, pursuant to policy LA3 of the adopted site allocations development plan document (2017) to provide for up to 1100 dwellings (with up to 40% affordable housing), comprising full planning proposals for 350 dwellings and outline planning proposals (including means of access) for 750 dwellings. The application proposes the development of up to 1100 new dwellings (including affordable housing), land for up to seven pitch gypsy traveller sites, together with landscaping, roads, footpaths and cycleways, ecological mitigation, sustainable drainage systems, earthworks, public open space, one neighbourhood equipped area of play (NEAP), two locally equipped areas of play (LEAP) and a community games area (CGA). A site for a primary school and associated nursery with playing fields on site of up to 2.1 hectares (inc. cga), specialist accommodation for the elderly with up to 70 rooms (C2 or C3), a convenience store of up to 450 sq. m (A1), three retail units each of which would be up to 100 sq.m (A1, A2, A3, A4 and A5), a community facility of up to 175 sq.m (D1), a medical facility or other use of up to 100 sq.m (A1, C3 and D1), a childrens day nursery of up to 450 sq.m (D1), a shared car park. The full application details which are submitted comprise of - a new vehicular access to Long Chaulden, a new vehicular access extension from The Avenue, emergency access to Chaulden Lane, new vehicular access from Chaulden Lane serving only the land for up to a seven pitch gypsy and traveller site and access to a foul drainage pumping station, a foul drainage pumping station to Chaulden Lane and the associated connecting sewer, the creation of the first phase of 350 new dwellings and associated landscaping (including affordable housing); together with associated public open space and associated landscaping, roads, footpaths and cycleways, ecological mitigation, sustainable drainage systems, earthworks, and one associated local equipped area of play (LEAP)

**LA3, LAND AT WEST HEMEL HEMPSTEAD**

LA3, LAND AT WEST HEMEL HEMPSTEAD

Site Location Plan Drawing No: RL002 (Rev:B)



Item 5a 4/03268/18/MFA

**LA3, LAND AT WEST HEMEL HEMPSTEAD**

Red Line Plan Drawing No: RL001 (Rev:B)





LA3, LAND AT WEST HEMEL HEMPSTEAD

Amended Illustrative Masterplan July 2019



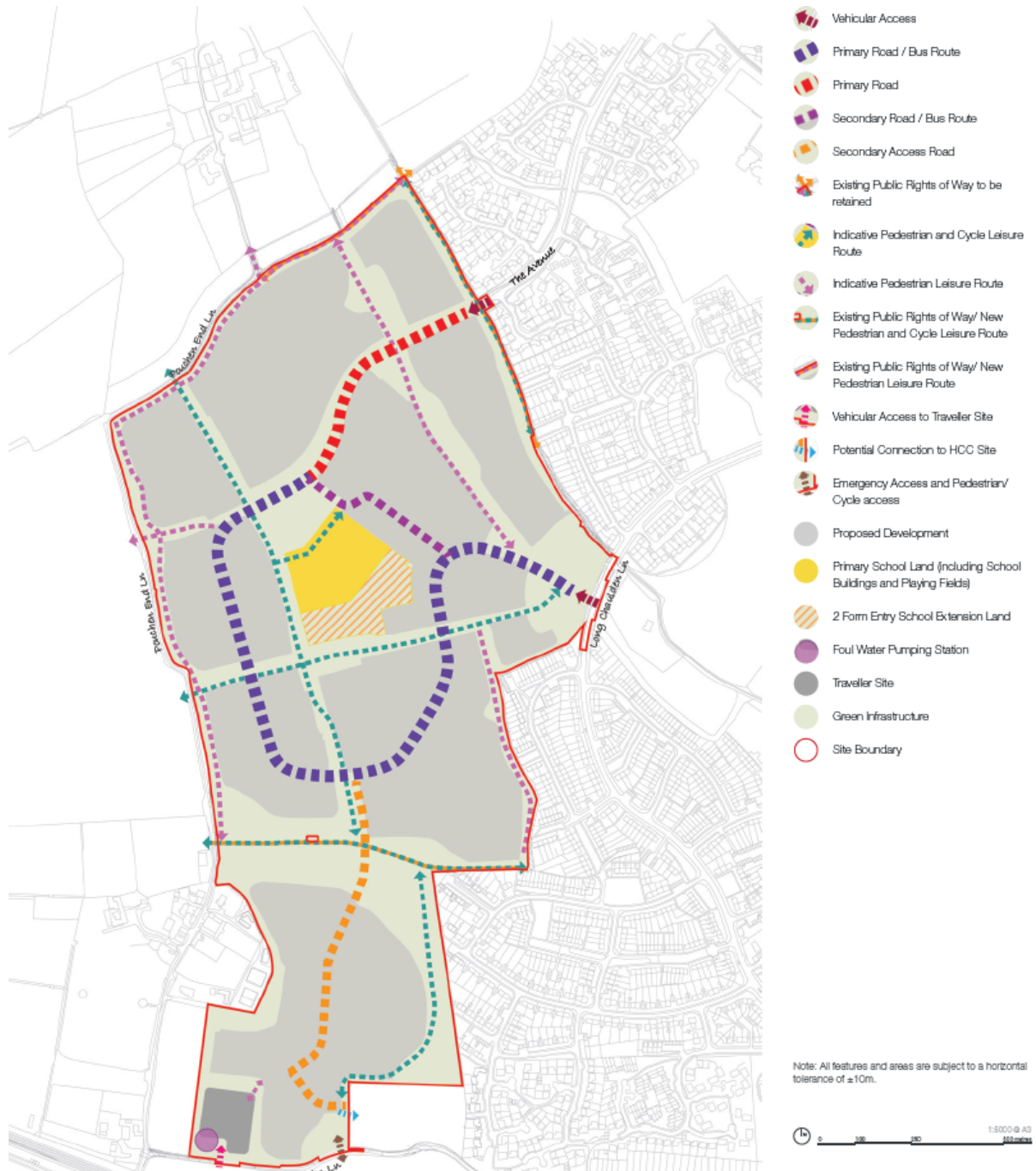
**LA3, LAND AT WEST HEMEL HEMPSTEAD**

Amended Illustrative Masterplan July 2019 Key

- 01 Attractive green gateway entrance
- 02 Shared Space Square
- 03 Opportunity for Community building/retail/care home/nursery/apartments
- 04 2FE Primary School
- 05 Valley Strategic|Open Space
- 06 Multi-functional Green Space
- 07 Retained hedgerows will become a key part of the green infrastructure network
- 08 Potential location for community garden
- 09 Indicative Pedestrian and Cycle Leisure Route
- 10 SuDS features control surface water run off and designed to maximise their role in providing usable public space

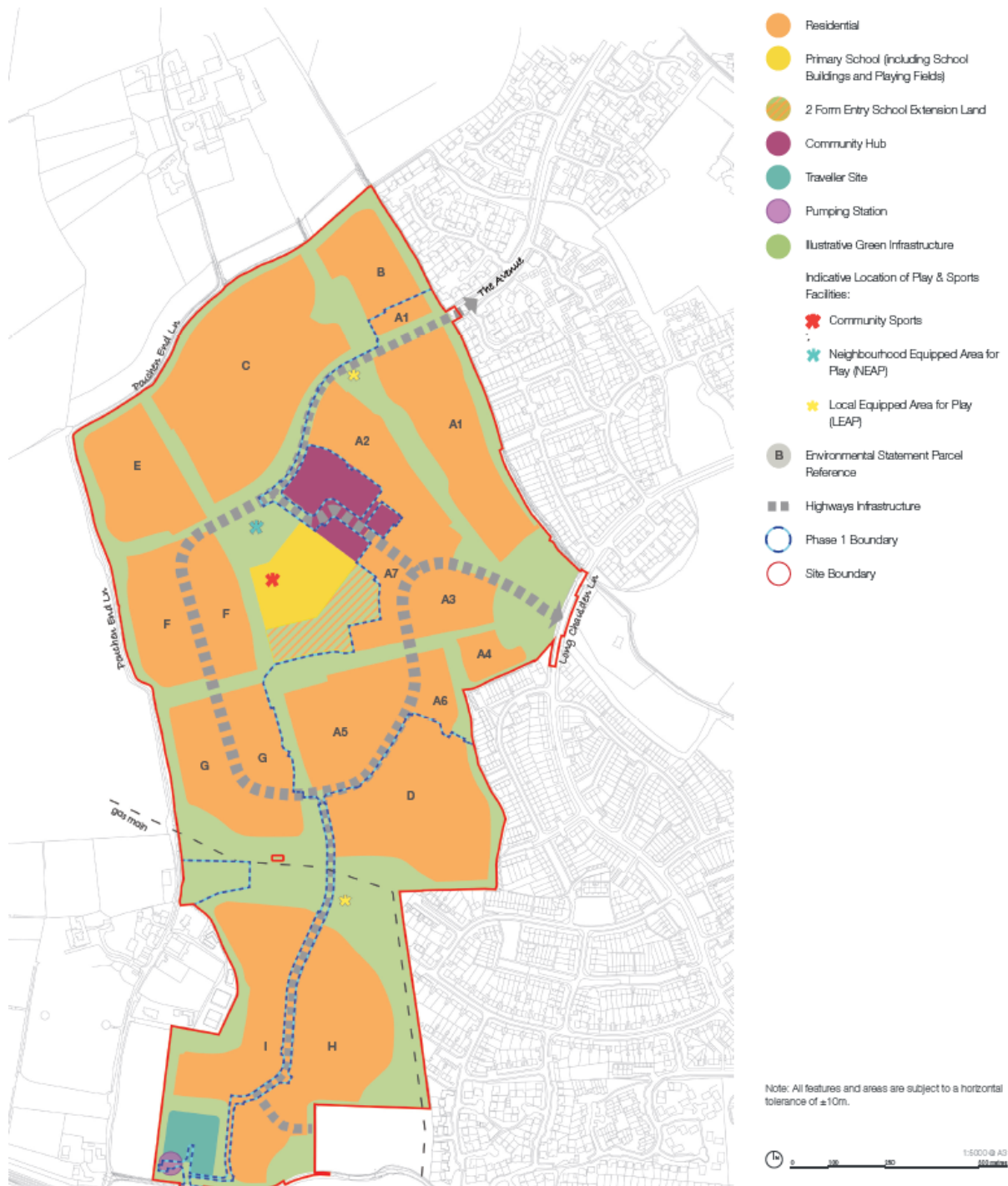
LA3, LAND AT WEST HEMEL HEMPSTEAD

Movement Parameter Plan: Drawing No: PP01 (Rev M)



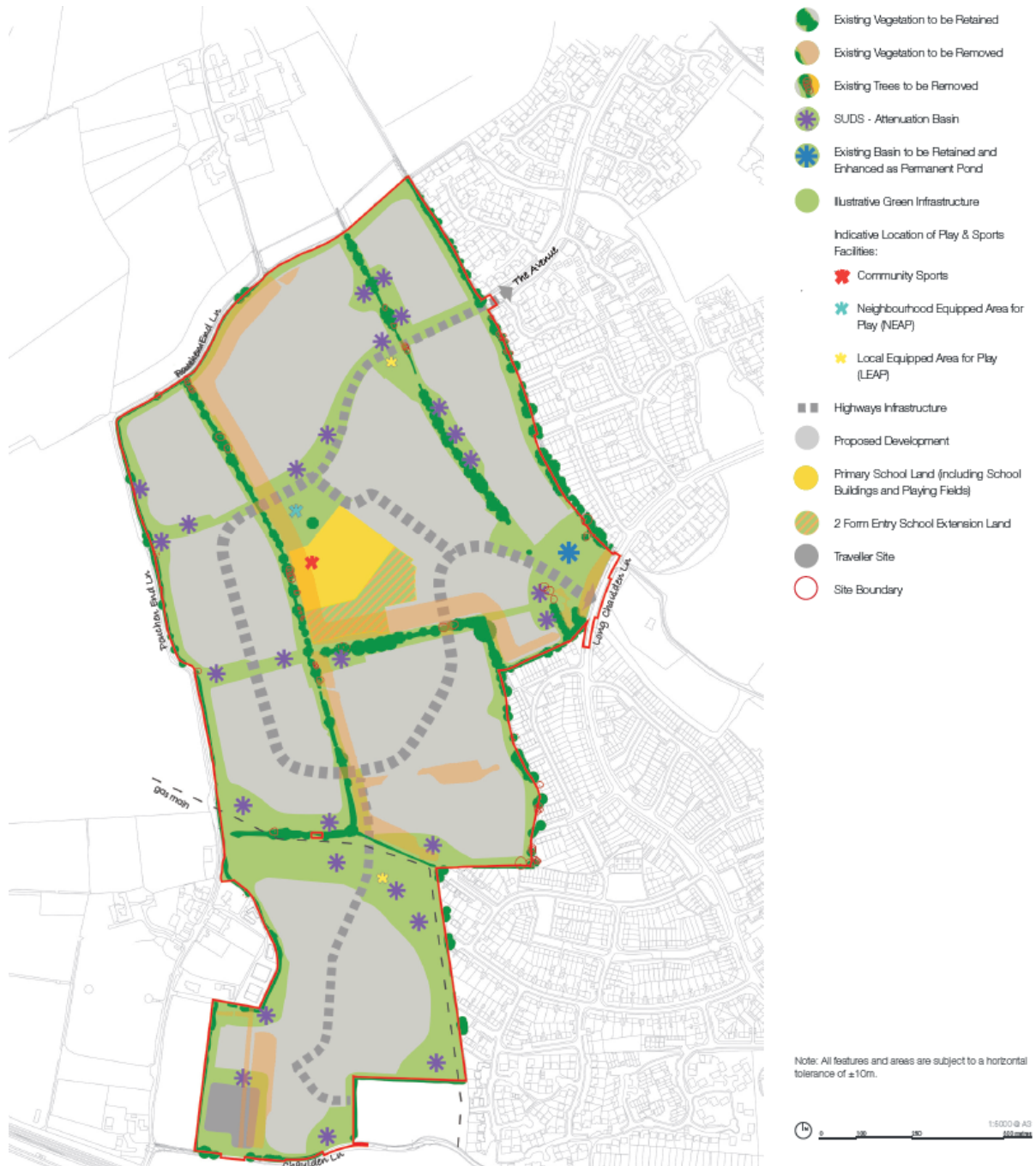
LA3, LAND AT WEST HEMEL HEMPSTEAD

Land Use Parameter Plan: Drawing No:PP02 (Rev:Q)



LA3, LAND AT WEST HEMEL HEMPSTEAD

Green Infrastructure Parameter Plan: Drawing No:PP03 (Rev:M)

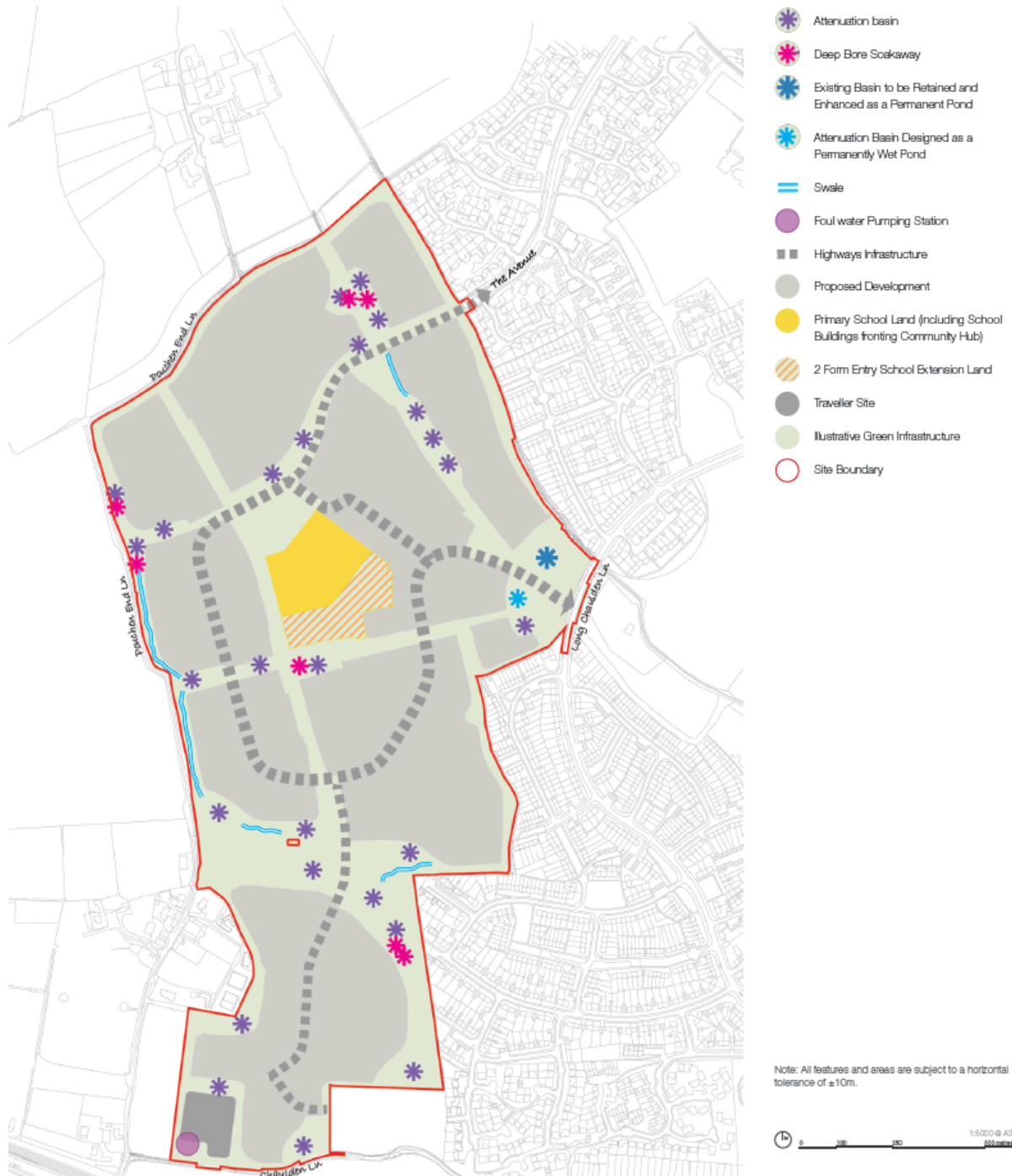


Note: All features and areas are subject to a horizontal tolerance of ±10m.



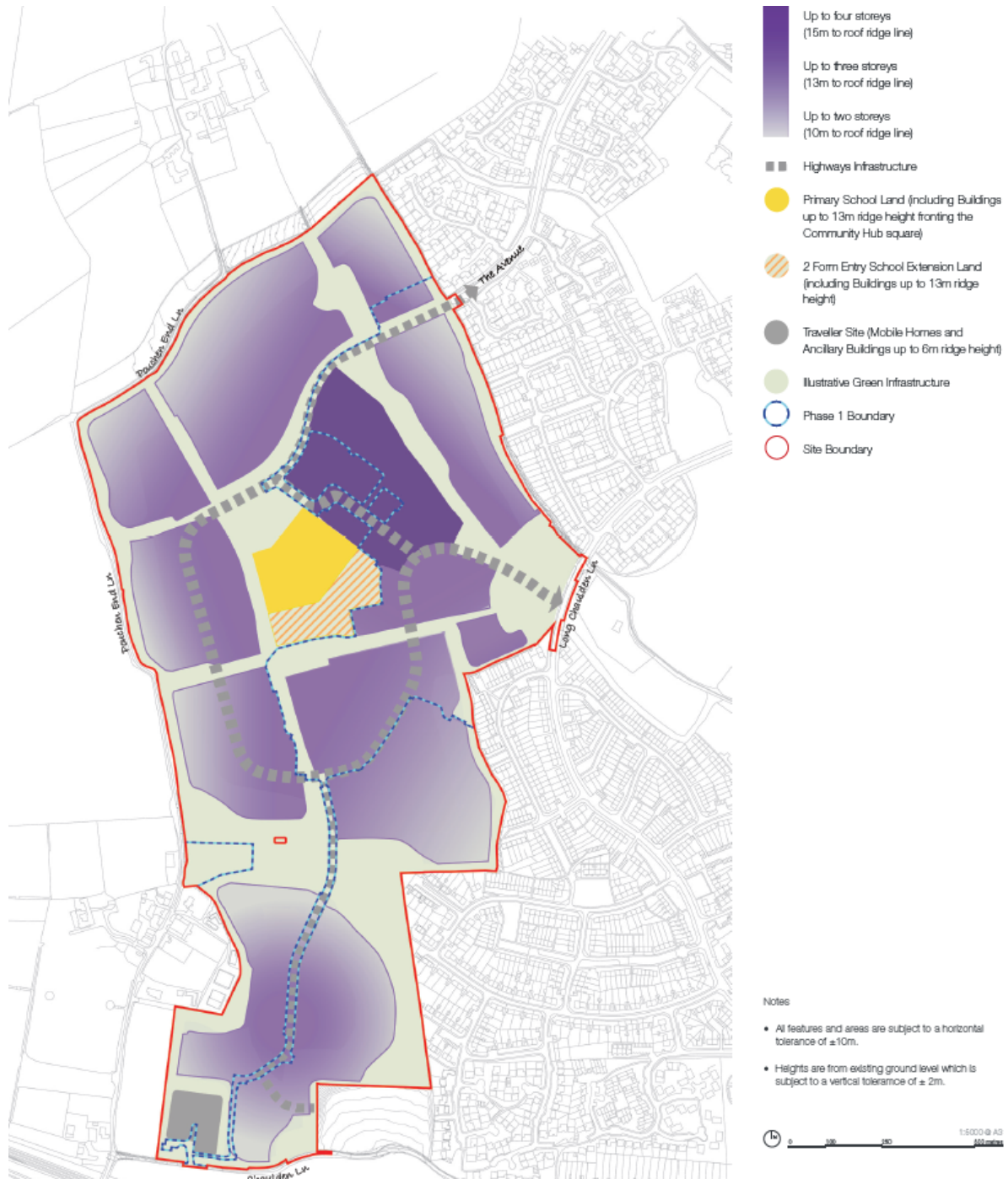
LA3, LAND AT WEST HEMEL HEMPSTEAD

Hydrology Parameter Plan: Drawing No:PP04 (Rev:M)



LA3, LAND AT WEST HEMEL HEMPSTEAD

Building Heights Parameter Plan: Drawing No:PP05 (Rev: P)



LA3, LAND AT WEST HEMEL HEMPSTEAD

Composite Phase 1 Site Layout: Drawing No: P16-0587\_03R-1



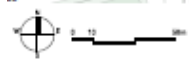
LA3, LAND WEST OF HEMEL HEMPSTEAD - COMPOSITE PHASE 1 SITE LAYOUT





LA3, LAND AT WEST HEMEL HEMPSTEAD

Phase 1 Building Heights: Drawing No: P16-0587\_16C



LA3, LAND WEST OF HEMEL HEMPSTEAD - PHASE 1 BUILDING HEIGHTS PLAN



Item 5a 4/03268/18/MFA

# LA3, LAND AT WEST HEMEL HEMPSTEAD

## Composite Phase 1 Street Scenes



PRIMARY ROAD STREET SCENE



GREEN EDGE / CORRIDORS STREET SCENE



SHARED SURFACE STREET SCENE

### LA3, LAND WEST OF HEMEL HEMPSTEAD THE GATEWAY 1 STREET SCENES

#### HEMEL HEMPSTEAD PRECEDENT IMAGES



RENDERED DWELLINGS SET WITHIN A LANDSCAPED SETTING



BAY WINDOWS AND LEAN-TO CANOPIES



DARK TIMBER CLADDING ON EXISTING BARN CONVERSIONS



TIMBER CLADDING TO FIRST FLOOR ABOVE RENDER



BLACK PAINTED PLINTH



CHIMNEYS FOUND COMMONLY IN HEMEL HEMPSTEAD



USE OF RENDER TO BREAK UP PROMINENCE OF BRICK

#### CHAULDEN GATEWAY STREET SCENE - CONTEMPORARY PROPOSALS



#### INSPIRATION FOR CONTEMPORARY DESIGN



GILLIES MEADOW



TRUMPINGTON MEADOWS



SIDE ELEVATION



SIDE ELEVATION

#### INSPIRATION FOR CONTEMPORARY DESIGN



CANE HILL PARK



4/03266/18/MFA	Hybrid planning application for mixed use development at west Hemel Hempstead, pursuant to policy LA3 of the adopted site allocations development plan document (2017) to provide for up to 1100 dwellings (with up to 40% affordable housing), comprising full planning proposals for 350 dwellings and outline planning proposals (including means of access) for 750 dwellings. The application proposes the development of up to 1100 new dwellings (including affordable housing), land for up to seven pitch gypsy traveller sites, together with landscaping, roads, footpaths and cycleways, ecological mitigation, sustainable drainage systems, earthworks, public open space, one neighbourhood equipped area of play (NEAP), two locally equipped areas of play (LEAP) and a community games area (CGA). A site for a primary school and associated nursery with playing fields on site of up to 2.1 hectares (inc. cga), specialist accommodation for the elderly with up to 70 rooms (C2 or C3), a convenience store of up to 450 sq. m (A1), three retail units each of which would be up to 100 sq.m (A1, A2, A3, A4 and A5), a community facility of up to 175 sq.m (D1), a medical facility or other use of up to 100 sq.m (A1, C3 and D1), a childrens day nursery of up to 450 sq.m (D1), a shared car park. The full application details which are submitted comprise of - a new vehicular access to Long Chaulden, a new vehicular access extension from The Avenue, emergency access to Chaulden Lane, new vehicular access from Chaulden Lane serving only the land for up to a seven pitch gypsy and traveller site and access to a foul drainage pumping station, a foul drainage pumping station to Chaulden Lane and the associated connecting sewer, the creation of the first phase of 350 new dwellings and associated landscaping (including affordable housing); together with associated public open space and associated landscaping, roads, footpaths and cycleways, ecological mitigation, sustainable drainage systems, earthworks, and one associated local equipped area of play (LEAP)
Site Address	LA3, LAND AT WEST HEMEL HEMPSTEAD
Applicant	BDW Trading Ltd (Barratt David Wilson), Taylor Wimpey UK Ltd, Stimpsons and Bletsoes
Case Officer	Ross Herbert
Referral to Committee	S106 Agreement

## 1. Recommendation

1.1 That planning permission be **DELEGATED TO THE GROUP MANAGER DEVELOPMENT MANAGEMENT WITH A VIEW TO APPROVAL**, subject to the completion of a S106 Agreement and agreement of final planning conditions.

## **2. Summary**

2.1 The applicant and their agents have engaged proactively with the Council through an in-depth pre-application submission. This process has helped to inform the masterplanning of the site and has helped to guide the proposals so that they are able to meet the aspirations of the applicants, along with those of both the Borough Council and the County Council. The planning application is supported by a Statement of Community Involvement (SCI) setting out how consultation has informed the scheme. In addition a suite of technical assessments have been submitted, including an Environmental Statement, demonstrating that no adverse impacts would arise from the development.

2.2 The implementation of the proposed development will result in the delivery of a residential allocation within both the Adopted Core Strategy and Adopted Site Allocations DPD. It will make a vital contribution to maintaining an essential pipeline of housing supply, which is critical to the Council being able to meet the requirements of the Government's Housing Delivery Test. The site represents an important short-medium term contribution to Dacorum's overall housing supply in the Local Plan and, importantly, to the 5 year housing land supply position.

2.3 The Council is not at present able to demonstrate a 5 year supply of deliverable housing sites as required by the NPPF and as a consequence the proposal must be considered against the Framework's presumption in favour of sustainable development (paragraph 11). The proposals would clearly deliver social and economic benefits in terms of new homes, social and community infrastructure, highways improvements and local employment during the construction process which would outweigh any neutral/negative impact on the local environment. It is prudent to expedite the delivery of allocated sites in the interests of maintaining a housing land supply and the supply of affordable homes and to address causes of under-delivery as required under paragraphs 67, 75 and 76 of the NPPF.

2.4 Officers are satisfied that the proposed quantum has been robustly evidenced and justified through a suite of technical documents which support the application. It is considered that the increase in numbers will help to ensure a more effective use of the land. The increased housing numbers will not result in any additional harm whilst they would result in additional benefits. These include the provision of a greater number of affordable homes. It will also allow the development to better support the provision of associated infrastructure to support the development, including the primary school, community hub, funding for additional GP provision and off-site highways benefits. The additional housing proposed will also make a valuable contribution to the Council's 5 year housing land supply.

2.5 Section 12 of the NPPF places great emphasis on the role of good design in place making as does the National Design Guide. While the level of detail provided between the full and outline elements differs, it is considered that, on balance, following the improvements which have been made to the design following the urban design workshops and the submission of the Urban Design Framework, the proposals are in accordance with the provisions of the NPPF, Core Strategy Policies CS10, CS11 and CS12, the Site Allocations DPD, and, in particular, the LA3 Masterplan when it comes to urban design and design.

2.6 The proposals provide for up to 40% affordable housing. This will be secured via a S106 agreement. The tenure split of this provision will be 75% affordable rent / 25% intermediate housing, which accords with adopted policy. The proposed development will secure a high proportion of affordable housing in compliance with the LA3 Masterplan, Site Allocations SPD and Core Strategy Policy CS19. This is considered to be a significant benefit of the proposed scheme.

2.7 The proposed location of the Gypsy and Traveller site complies with the requirements of the Site Allocations DPD and the LA3 Masterplan. It is considered to be an appropriate location. It is concluded that the site forms an integrated part of the wider LA3 development and is linked to the wider development via footpath and cycle links, whilst having a separate vehicular access point, in accordance with the Council's Masterplan. Its location in the south of the development is considered to strike a good balance between ensuring good levels of accessibility to the wider LA3 facilities (such as the primary school and community hub), whilst ensuring that future residents of the site will be able to continue to maintain their culture and way of life. The proposals are considered to be in compliance with Core Strategy Policy CS22 in this regard, along with the requirements of the Site Allocations DPD and the LA3 Masterplan.

2.8 The proposals are considered to represent sustainable development. The proposed development at LA3 would result in a sustainable new neighbourhood when considering the social, environmental and economic strands to sustainable development. Overall it is considered that the proposals comply with the relevant elements of Core Strategy Policies CS28 and CS29, as well as the NPPF.

2.9 The Highway Authority (the County Council) has been consulted on the application and has assessed the proposals. Following the submission of the Transport Assessment Addendum and further associated supporting information the Highway Authority has confirmed that they are satisfied with the proposals in terms of highways impact and off-site mitigation. They have recommended permitting the proposed development subject to suitable conditions, mitigation measures on the local highway network and Section 106 contributions toward schemes and measures to mitigate the impact on the local highway network. It is considered that the access and highways elements of the proposals are in compliance with the NPPF, Core Strategy Policies CS8, CS9, CS10, CS11, CS12, CS13, CS28, adopted Site Allocations DPD Policies LA3 and SA3 and, in particular, the Access and Movement Strategy Principles of the Council's adopted LA3 Masterplan.

2.10 The Site has been assessed against all relevant policies of the Development Plan, as well as other relevant material considerations. The proposals are considered to be in accordance with the Development Plan and other relevant material considerations.

2.11 The proposals represent a suitable, sustainable and deliverable development at the Council's largest residential allocation, as set out within both the adopted Core Strategy and adopted Site Allocations DPD. It will deliver much needed market and affordable housing along with other tangible benefits, whilst resulting in no significant harm. The planning balance clearly favours development of the proposals. Therefore, in accordance with paragraph 11 of the NPPF and Section 38(6) of the Planning and

Compulsory Purchase Act 2004, officers recommend that planning permission should be granted without delay, subject to the agreement of the S106 Agreement currently being negotiated.

### **3. Site Description**

3.1 The Application Site is located on the western edge of Hemel Hempstead, directly adjacent to the neighbourhoods of Warner's End and Chaulden and adjacent to the hamlet of Pouchen End. The Site measures 51.8ha (128 acres) in area and is roughly rectangular.

3.2 The Site is currently in agricultural use comprising fields, which are predominantly arable. The Site is subdivided by hedgerows, hedgerow trees and fences. None of the site is subject to any statutory landscape designations. There are significant changes in levels across the site.

3.3 It is located approximately 2.5km from the Town Centre of Hemel Hempstead. The Town Centre is accessible from the Site via a number of sustainable means including by bus and cycling. Hemel Hempstead train station is located approximately 2km from the Site. The station offers frequent Southern and London North-western services to London Euston, as well as other key regional centres such as Milton Keynes and Northampton.

3.4 The site is allocated for residential development by Policy CS3 of the Dacorum Borough Core Strategy and by Policy LA3 (West of Hemel Hempstead) of the subsequently adopted Site Allocations DPD. The Site Allocations DPD includes a Masterplan for the LA3 allocation.

### **4. Proposal**

4.1 The planning application is in hybrid form. Planning permission is sought for development across the entire site, with full permission sought for all detailed elements for the first phase of the development (Phase 1) and outline permission sought for the rest of the site

4.2 The application proposes a development of up to 1,100 new dwellings (including affordable housing), land for a seven pitch gypsy and traveller site, together with landscaping, roads footpaths and cycleways, ecological mitigation, sustainable drainage systems, earthworks, public open space, one Neighbourhood Equipped Area of Play (NEAP), two Locally Equipped Areas of Play (LEAP) and a Community Games Area (CGA), together with a Community Hub. The Community Hub comprises:

- a site for a primary school and associated nursery with playing fields on a site of up to 2.1 hectares (including CGA);
- specialist affordable accommodation for the elderly with up to 70 rooms (C2 or C3);
- a convenience store of up to 450 sq. m floor space (A1);
- three up to 100 sq. m floor space retail units (A1, A2, A3, A4 and A5);
- a community facility of up to 175 sq. m floor space (D1);
- a further local retail use of up to 100 sq. m floor space (A1, C3 and D1);
- a children's day nursery of up to 450 sq. m floor space (D1); and

- a shared public car park to serve the uses in the community hub.

4.3 As previously stated, the application is hybrid in nature and the detailed Phase One element covers 15.45 hectares (38.17 acres) of the total application site. This full application for Phase 1 comprises the following elements:

- a new vehicular access to Long Chaulden
- a new vehicular access extension from The Avenue
- an emergency access to Chaulden Lane
- a new vehicular access from Chaulden Lane serving only a seven pitch gypsy and traveller site and access to a foul drainage pumping station
- a foul drainage pumping station to Chaulden Lane and the associated connecting sewer.
- the creation of the first phase of 350 new dwellings and associated landscaping (including affordable housing); together with associated public open space and associated landscaping, roads, footpaths and
- cycleways, ecological mitigation, sustainable drainage systems, earthworks, and one associated Local Equipped Area of Play (LEAP).

## **5. Relevant Planning History**

5.1 No previous planning applications but the site has been confirmed for residential development through the adopted Dacorum Core Strategy and Site Allocations DPD, both of which have been subject to public consultation and testing through Public Examination.

## **6. Policies**

### 6.1 National Policy Guidance

National Planning Policy Framework (NPPF)  
National Planning Policy Guidance (NPPG) and National Design Guide

### 6.2 Adopted Core Strategy

Policies CS1, CS2, CS3, CS4, CS5, CS8, CS9, CS10, CS11, CS12, CS13, CS18, CS22, CS23, CS25, CS26, CS27, CS28, CS29, CS32, CS35.

### 6.3 Saved Policies of the Dacorum Borough Local Plan

Policies 10, 12, 13, 15, 18, 19, 21, 31, 37, 51, 54, 55, 57, 58, 59, 61, 62, 63, 64, 69, 73, 76, 79, 99, 100, 101, 102, 103, 111, 113, 118, 125, 129  
Appendices 1, 2, 3, 4, 5.

### 6.4 Site Allocation Development Plan Document

Site LA3 and Masterplan

## 6.5 Supplementary Planning Guidance / Documents

- Environmental Guidelines (May 2004)
- Water Conservation & Sustainable Drainage (June 2005)
- Energy Efficiency & Conservation (June 2006)
- Accessibility Zones for the Application of car Parking Standards (July 2002)
- Landscape Character Assessment (May 2004)
- Chilterns Buildings Design Guide (Feb 2013)
- Planning Obligations (April 2011)
- Affordable Housing (Jan 2013)
- Landscape Character Appraisals

## 6.6 Advice Notes and Appraisals

- Sustainable Development Advice Note (March 2011)

## **7. Constraints**

- 45.7M AIR DIR LIMIT
- RAILWAY (100M BUFFER)
- AREA OF SPECIAL CONTROL FOR ADVERTS
- AREA OF ARCHAEOLOGICAL IMPORTANCE
- HIGH PRESSURE GAS MAIN
- Right of Way
- TREE PRESERVATION ORDER
- 15.2M AIR DIR LIMIT
- 10.7M AIR DIR LIMIT

## **8. Representations**

### Consultation responses

8.1 These are reproduced in full at Appendix A

### Neighbour notification/site notice responses

8.2 These are reproduced in full at Appendix B.

### Meetings with local representative organisations

8.3 Officers have met with key members of the three main local representative organisations West Hemel Action Group (WHAG), Bourne End Village Association and Dacrom Environmental Forum (DEF) at both the pre-application and application stages of the application process.

### Applicant's pre-application public consultation

8.4 Where proposals are large scale and likely to impact on an area, the Council's Statement of Community Involvement encourages applicants to engage directly with



the local community prior to the submission of a planning application. The application has been subject to lengthy pre-application discussions and public consultation formed part of the pre-application process. A summary of the main issues raised at the public consultation events, together with the applicant's responses, is set out at Appendix B

## **9. Considerations**

### 9.1 Main issues

9.1.1 The main issues to consider are:

- Policy and Principle
- Housing Delivery
- Timing and Phasing
- Quantum of Residential Development
- Density of Residential Development
- Housing Mix
- Affordable Housing
- Gypsy and Traveller Provision
- Provision of Non-residential Development – Community Facilities
- Design
- Landscape and Visual Impact
- Green Infrastructure, Landscaping and Trees
- Socio-economic
- Sustainability
- Access and Highways
- Flood Risk and Drainage
- Ecology
- Heritage
- Archaeology
- Grounds Conditions/Contamination
- Air Quality
- Noise

### 9.2 Policy and Principle

9.2.1 The strategic objectives of the Dacorum Borough Core Strategy include promoting Hemel Hempstead as the focus within the Borough for homes, jobs and strategic services thus reinforcing the role of neighbourhoods in the town (Policy CS1). Within the Borough's settlement hierarchy, Hemel Hempstead is specifically identified as the main centre for development and change. In keeping with this spatial strategy, the Core Strategy makes provision for 10,750 dwellings between 2006 and 2031, with 8,800 of these being provided within Hemel Hempstead.

9.2.2 The provisions of Policy CS2(B) provides the basis for extending existing settlements. This is subject to meeting a list of criteria, which include the following:

- allowing good transport connections (see Policy CS8);
- having full regard to environmental assets, constraints and opportunities;

- ensuring the most effective use of land;
- respecting local character and landscape context;
- according with the approach to urban structure (see Policy CS4); and
- complying with Policy CS35 regarding infrastructure delivery and phasing.

9.2.3 The provisions of Policy CS3 seek to manage selected development sites so that they come forward from 2021 onwards. The Application Site is listed within Table 9, which is referenced within Policy CS3 and is therefore safeguarded for residential development.

9.2.4 The site was previously deemed to be part of the Green Belt (Policy CS5), as confirmed on the Core Strategy Proposals Map. However, the provisions of Policy CS5 state that this policy will no longer apply when the Application Site is allocated for development in the complementary Site Allocations DPD. This has subsequently been adopted and the site has therefore been removed from the Green Belt and allocated for residential development.

9.2.5 The Core Strategy specifically identifies the Application Site as a housing allocation (LA3) to be delivered through the adopted Site Allocations DPD, with the timescale for the site's release from the Green Belt to be specified within the SPD. The Local Allocations table for LA3 states that the site will deliver new homes together with a shop, doctors surgery (or S106 contribution towards expansion of the local GP surgery) and additional social and community infrastructure. The Core Strategy identifies a number of principles for the development. However, these have since been incorporated within, or superseded by, the adopted Site Allocations DPD, which considers allocation sites in more detail.

9.2.6 The Council's Strategic Planning Team have commented that it welcomes the application bringing forward the LA3 allocation. It will make a vital contribution to maintaining an essential pipeline of housing supply, which is critical to the Council being able to meet the requirements of the Government's Housing Delivery Test. The site represents an important short-medium term contribution to Dacorum's overall housing supply in the Local Plan and, importantly, to the 5 year housing land supply position.

9.2.7 The principle of the development of the allocated LA3 site for residential led mixed-use development is therefore acceptable, in compliance with the above-mentioned policies.

### 9.3 Housing Delivery

9.3.1 The housing target in Policy CS17 sets a level of housing which the Council expects to achieve and exceed. As members will be aware, this target is for the provision of an average of 430 dwellings per annum between 2006 and 2031. This target will increase through the new Single Local Plan (SLP), which is currently in preparation, because of the Government's new standard methodology for establishing local housing need. Tables 8 and 9 of the Core Strategy make it clear that the towns and allocated sites have an important role in the delivery of the housing strategy.

9.3.2 Policy NP1 of the Core Strategy requires the Council to take a positive approach to the consideration of development proposals and work pro-actively with applicants to find solutions for development proposals that help to improve the economic, social and environmental conditions in Dacorum. This would extend to addressing blockages or expediting the delivery of housing sites such as LA3 where it can be demonstrated that there could be an unreasonable delay in the delivery of homes or where sites are identified as needing to come forward within a reasonable timescale.

9.3.3 The Council is not at present able to demonstrate a 5-year supply of deliverable housing sites as required by the NPPF and therefore the proposal must be considered against the Framework's presumption in favour of sustainable development (paragraph 11). The proposals would clearly deliver social and economic benefits in terms of new homes, social and community infrastructure, highways improvements and local employment during the construction process, which would outweigh any neutral/negative impact on the local environment. This will be explored in detail later in the report. It is prudent to expedite the delivery of allocated sites in the interests of maintaining a housing land supply and the supply of affordable homes and to address causes of under-delivery as required under paragraphs 67, 75 and 76 of the NPPF.

#### 9.4 Timing and Phasing

9.4.1 The Adopted Site Allocations DPD states that allocation LA3 may be brought forward for delivery immediately given the need to develop new housing and the fact that site is no longer within the Green Belt. As such, this planning application conforms with the provisions of allocated site LA3 in that it seeks to provide housing and Gypsy/Traveller pitches as soon as practicable.

9.4.2 The adopted Master Plan for the site incorporates an indicative phasing plan. The submitted plans for Phase 1 are broadly reflective of the location of the first Phase within this indicative plan. The Council is supportive of delivering the school and community hub in an early phase of development.

9.4.3 The delivery of the proposals as early as possible is also in accordance with the amended NPPF, which seeks to expedite the delivery of homes. This will also aid the Council in meeting the Housing Delivery Test.

#### 9.5 Quantum of Residential Development

9.5.1 Both the Core Strategy and the Adopted Site Allocations DPD state that the LA3 Allocation is capable of accommodating an estimated 900 dwellings, as well as other uses including community facilities, a primary school, open space and 7 Gypsy/Traveller pitches. However, paragraph 6.21 of the Adopted Site Allocations DPD makes it clear that the net capacity figures for allocations only provide an estimated capacity and should not be seen as a maximum. The Council's adopted policies make it clear that the final dwelling capacities will be established through the Planning Application process, based on technical evidence and on a scheme's adherence to planning requirements and other relevant policies and guidance.

9.5.2 The Planning Application is seeking permission for up to 1,100 homes, which reflects the description associated with the EIA Scoping. Whereas this is more than

the estimated 900 capacity of the site stated within the Core Strategy, Adopted Site Allocations DPD and Master Plan, the quantum of residential development proposed has been determined based on a more detailed understanding of the site, through a full suite of further technical assessments and thorough design process. Furthermore, the proposals are considered to adhere to all relevant planning requirements and represent sustainable development.

9.5.3 As part of the site assessment process the applicants identified areas of the site identified which were deemed capable of being developed for housing which were not identified on the Masterplan. Supported by the suite of technical studies, which accompanies the application, this has allowed the applicants to increase housing numbers whilst maintaining the same densities envisaged in the Masterplan.

9.5.4 The Council's Strategic Policy Team has assessed the proposals and have raised no objections to the increase in quantum. It has confirmed that:

*'Fundamentally, we raise no objection in principle to the proposed increase in the capacity of the development from 900 to 1,100 homes compared to that shown in the Plan. This is on the basis that the Site Allocations DPD allows for the capacity for the allocation to be exceeded (para 6.21/Schedule of Housing Proposals and Sites):*

*"The net capacity figures specified provide an estimate of expected capacity and should not be treated as a maxima. Final dwelling capacities will be tested through the planning application process, where detailed schemes will be expected to demonstrate compliance with specified requirements and other relevant policies and guidance."*

*Therefore, the onus is on the applicant to demonstrate that the increased scale of the proposal can be accommodated to the satisfaction of the Council in terms of design, access, highways, local infrastructure, etc. We note that the applicants have submitted a wide range of technical documents in support of this level of development including:*

- *Transport and Access;*
- *Air Quality;*
- *Noise;*
- *Drainage and Flood Risk;*
- *Biodiversity;*
- *Landscape and Visual Impact;*
- *Cultural Heritage; and*
- *Socio-Economic Effects*

*The increased scale of development is likely to ultimately ensure a more effective use of the land and will also be reflected in slightly higher levels of overall densities (in the range of 35-55 dwellings/per hectare). However, this places even more importance on design matters and in achieving a high quality of development. I acknowledge that you are taking this forward in conjunction with the Strategic Sites delivery team who are providing you with advice and guidance on urban design matters.'*

9.5.5 Officers are satisfied that the proposed quantum has been robustly evidenced and justified through a suite of technical documents, which support the application. It is considered that the increase in numbers will help to ensure a more effective use of

the land. This is always an important consideration but is particularly pertinent in this case, as the land has been removed from the Green Belt to facilitate the delivery of a mixed use, residential led development and the site is the Council's largest housing allocation. It will also allow the development to better support the provision of associated infrastructure to support the development. The additional housing proposed will also make a valuable contribution to the Council's 5-year housing land supply.

## 9.6 Density of Residential Development

9.6.1 Local Plan Policy 21 states that sites will be expected to demonstrate densities of between 30 to 50 dwellings per hectare (dph). The policy goes on to state that, for sites on the edge of the settlement, particular attention should be given to the effect of development density upon open countryside and views.

9.6.2 The approach to densities is set out in the Design and Access Statement. This confirms that, as in the case of building heights, these will respond to the roles and responsibilities of the structure of the streets and spaces, land uses and context. Densities also help provide cues to understanding the form of the place, with clusters of higher densities along key movement corridors and areas of interaction such as the community hub.

9.6.3 Densities vary throughout the development but are in the range of 35 – 55 dwellings per hectare, with an average density towards the lower end of that range. The densities across the whole Site are outlined in the Design and Access Statement as part of the Indicative Density Plan. The maximum density proposed is 55 dph in and immediately surrounding the Community Hub. This is due to the provision of flats, and in order to generate a sense of place and arrival. Lower densities are found throughout the remainder of the Site, with the lowest densities at 35 dwellings per hectare on the sensitive edges of the site, such as Pouchen End Lane in accordance with the principles established within the LA3 Master Plan.

9.6.4 The proposals are considered to comply with Local Plan Policy 21. The average density across the site is towards the lower end of the 30 - 50 dph range required as part of Local Plan Policy 21 and is considered acceptable. Densities only increase in and around the proposed Community Hub and this is for sound urban design reasons. Even the maximum proposed density of 55 dph is only slightly above the density range required in Local Plan Policy 21.

## 9.7 Design

9.7.1 Section 12 of the NPPF places great emphasis on the role of good design in place making. Paragraph 124 of the Framework states that:

*'The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.'*

9.7.2 Paragraph 130 states that:

*'Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.'*

9.7.3 The emphasis on the key role good design plays in place making is supported by Core Strategy Policies CS10, 11 and 12. The Council's adopted LA3 Masterplan contains urban design principles, which draw on these policy objectives, aiming to refine and apply these more specifically to the LA3 site.

9.7.4 The submitted hybrid planning application is supported by a Design and Access Statement, as well as various plans for approval and illustrative plans. In the case of Phase One detailed plans have been submitted in relation to the design and these are for consideration at this stage.

9.7.5 In terms of the wider masterplan area, the detailed design of the overall layout and individual buildings within it are to be considered at the reserved matters stage. However, the Applicant has provided parameter plans within the Design and Access Statement, which serve to establish a structure for the development, as well as an illustrative masterplan, which serves to show an acceptable configuration. The Council's adopted LA3 Masterplan has informed this.

9.7.6 Further to a series of workshops with the case officer and Dacorum's Urban Design Officer in May - July 2019, an Urban Design Framework document has also been produced which provides a series of diagrams, images and written guidance to show how later phases of the development should be based on strong place-making and urban design principles. This effectively serves as a supporting addendum to the Design and Access Statement.

9.7.7 The design principles for the masterplan, along with matters of layout, scale, appearance, and landscaping are discussed below.

#### *Masterplan Design Principles*

9.7.8 The design principles established for the masterplan are set out in the Design and Access Statement and are set out below. They have been devised to create a well-structured and legible place, which delivers a high quality living environment for both people and wildlife.

- Establishing a vibrant mixed use community - the development will create a positive relationship between the existing Chaulden and Warner's End neighbourhoods and the mix of activities within the proposed development. In particular, opportunities for living and working in close proximity will be supported. Opportunities for the existing Chaulden and Warner's End community will be maximised through the provision of a new primary school and community hub.

- Creating a high quality versatile landscape for all - The masterplan has been led by an assessment of the landscape and biodiversity qualities of the site, including the local topography, hedgerows and field patterns. These qualities have been mapped out and the remaining land identified for a variety of development opportunities, which vary in terms of land use and residential densities. Densities will respond to changes in topography, views into the site and proximity to other aspects of the development such as the school, foot/cycle paths, the main through routes and public transport. The natural elements of the site, including existing trees and landscape will continue to form an integral part of the development. These will be enhanced and extended where appropriate, in order to enrich the landscape qualities within the scheme and around the local area. Easy access to a generous quantity of high quality, bio-diverse open space and informal and formal play provision, will be available to all residents, including the existing community.
- Ensuring good links with existing communities - Local facilities and services will be located to optimise access for new and existing residents, and to act as a natural meeting place within the wider residential setting. Enhancing connections and focusing higher densities on the primary east west and north-south links will help enhance viability of new and enhanced public transport connections and of existing nearby local facilities. Above all, it will create a highly connected and visible heart to the community. Emphasis will be placed on creating safe, comfortable and well-scaled, high quality landscaped spaces, which will act as focal points and complement the facilities of the existing neighbourhood. A new visible heart, the 'Community Hub', will be located at the meeting or 'nodal' point along the proposed access routes and the links from the east from Long Chaulden and the Avenue, encouraging a viable and vibrant point of social interaction. A principal component of the Masterplan includes provision for a new Primary School. The school and local facilities will help serve a wider area than the new development, with the community hub providing a strategically important new facility within the area.
- Creating a quality place - The character of the built form will deliver a unique and attractive living environment. The layout, orientation and pattern of development will support the creation of active and attractive streets. Variety in physical form will be generated by the inclusion of different dwelling types and sizes, and non-residential uses. The distinct character of the site's topography, setting and landscape features will form an integral part of the place.
- Establishing a meaningful density strategy - Across the development, densities will vary in order to create variety and choice, and will respond to local need and requirements for a sustainable development. Development densities will support the transport objectives for the overall development, and the creation of an attractive, social and commercially viable community hub. Densities will also respond to adjoining development, landscape characteristics and sensitive areas.
- Promoting low carbon travel - Opportunities for safe and convenient walking and cycling will be available throughout the development, each sufficient to offer a genuine alternative to the private car. The provision of high quality new village

spaces, to give orientation within a connected network of streets, will be an integral part of this. Convenient, attractive and safe connections to a central location, including local bus links, will also promote sustainable modes of travel. The network of cycle routes and green way corridors will enable children from the new and existing development to safely access the new primary school and Community Hub. These will also create connections to the Shrubhill Common footpath link and existing cycle route links beyond, connecting with Hemel Hempstead railway station to the south and leisure routes along the Grand Union Canal.

- A connected place - Creating a spine to the development by creating understandable key linkages to the local area. Key linkages should be designed as welcoming streets not highways. Creation of a loop through the development via Long Chaulden (east) and The Avenue (north) to allow additional opportunities for integration and comprehensive bus routes through the whole area. Integration with the existing neighbourhoods, with strong cycle and footpath connection to the proposed schools and community hub. Creating effective links to the new local centre and the new school.
- A sense of community - The development will create a thriving living community and contribute to the vitality of the adjoining neighbourhoods. A successful community should deliver facilities within easy reach by foot or cycle, and that is not presently the case. The development will deliver new facilities, including a new primary school. The integration of new facilities for the community is a vital attribute of the masterplan and will help ensure community cohesion.
- A mix of new homes - The proposal will deliver the balance of housing, employment (in the primary school and community hub) and recreation needed to create a strong community. It will provide a broad range of unit types and tenures, to create a mixed community, which responds to the local market requirements and ensures a viable and lasting development. It will be a place where people want to live. The scale and form of residential development also responds to the existing site characteristics (including trees, hedgerows and topography), as well as the roles and responsibilities of the place being created (relationship to public space, transport corridors and mixed-use heart).
- Landscape and biodiversity - The overall strategy is to set the development within the existing boundaries of trees and hedgerows and to limit vegetation removal through locating access points at existing gaps wherever possible. Particular attention has also been paid to minimising the visual impact of the development in views from the south, by the strategic reduction of building heights and strengthening of east-west green corridors. Acknowledging the location adjacent to the existing development and the wider countryside, improved access and recreation are important elements of the proposal. A focus on high quality public realm design and the application of sustainable design solutions to limit the impact of development and enhance biodiversity, will be key to the success of the scheme and to meet the following objectives:



- Create a green network to enhance biodiversity and access to amenity for the community. In particular, this enhances east-west links, providing connectivity between the countryside and existing residents of Hemel Hempstead and Shrubhill Common.
  - Create a range of opportunities for sport, recreation and play in line with NPPF (Section 8 Promoting Healthy Communities), Best Practice Guidance and to meet local requirements.
  - Highlight the balance between vehicles and pedestrians, with increased priority given to pedestrians and cyclists.
  - A 'green' neighbourhood, with street tree planting to unify the architecture and embed the development into the wider landscape.
  - Careful choice of materials and street furniture to enhance the understanding of the hierarchy of streets and spaces through landscape treatment.
  - Create new opportunities for local food growing as part of a sustainable community.
  - Create streets and squares that are places for people to enjoy, rather than simply passing through.
  - Incorporate an integrated Sustainable Drainage Systems (SuDS) system, that will sensitively connect the built up areas with wider landscape and include multi-functional landscaped attenuation basins with opportunity for enhanced ecological biodiversity.
- Sustainable development and energy efficiency - Sustainability is a key component of the development vision. As set out in Government guidance, there are three components to sustainability: environmental, social and economic, and all three need to be considered together. Energy efficiency is a key part of environmental sustainability. The scheme has been designed to minimise car travel and optimise walking, cycling and public transport use. Linkages to employment and retail uses off-site are also strong. The scheme embodies a high level of transport sustainability. Social inclusion, cohesion and a strong community focus are key elements of the vision and the design concept. The scheme incorporates education, community facilities, employment, open space, a local store, recreation and other essential elements. Affordable housing is integrated in all phases, built to a standard that is indistinguishable from market housing. In relation to energy and the desire to be a low carbon development, the most essential ingredient for any major new housing scheme is to achieve low energy buildings and a low energy layout. Therefore, 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 gain, taking advantage of solar technologies and reducing energy costs.

9.7.9 Key to ensuring a high quality design is creating a sense of place for the new development and ensuring that it has its own identity. The Urban Design Framework, submitted in support of the application following a series of urban design workshops

with officers, sets out the rationale for creating this identity in accordance with the masterplan principles set out within the adopted LA3 Masterplan.

9.7.10 The Urban Design Framework confirms that creating a strong sense of place with identifiable areas, features and uses, will help to ensure that the proposed development is understandable and accessible for the new residents and visitors alike. The proposed development will have an over-arching identity based on a landscape edge of town community. Much of the site will be focused around the existing site features such as the trees and hedgerows, as well as the relationship to adjoining communities and the importance of east-west landscaped connections.

9.7.11 Further to the over-arching landscape edge of town identity, and since the site is very large, covering some 51.82 hectares, the design approach has been to develop a series of separate 'identity areas'. This follows advice from officers that better defined character areas than those identified in the Design and Access Statement would be welcomed. These areas respond to the parameter plans and Urban Design Framework Plan, which have been guided by site-specific assessment. The Identity Areas also derive their role and response from the context of existing development and proximity to land uses, and the rural edge, including building form, densities, heights and uses, as well as the response and relationship to landscape features. A network of streets, squares and spaces, as above, will connect these areas.

9.7.12 The five Identity Areas are:

- Gateway - lower density, arrival space and frontage development. Landscape led primary entrance into the development, with wet attenuation basins on each side of entrance road, overlooked by an arc of new homes. This is the gateway space into the development and contains two permanently wet attenuation basins in a setting of native scrub and meadows, with a backdrop of existing forest-scale trees adjacent to the site's eastern boundary and within the small copse adjacent to Middle Hill. Strong connections from the landscape entrance space, fanning out to a series of linear green spaces, providing a strong landscape and footpath connection to Shrubhill Common to the east of the site. This sub-character area also forms part of the first phase detailed component of the planning application
- Community Hub - higher density housing, Primary School and mixed-use heart to the development, focused around a central urban square. A higher density mixed-use area, which incorporates the mixed-use quarter of the Community Hub, with its range of local shops, primary school, convenience retail and community facilities set around a square. In doing so, it creates a focal point to the new community to be created. The area creates a good connection to the gateway and towards the adjoining neighbourhoods of Chaulden and Warner End.
- Rural Edge and Valley - lower and medium density housing focused around a linear spaces. Residential areas, focused around green corridors. These are medium density areas, which provide a direct relationship to and overlook the strategic network of linear multifunctional green spaces that help to create the structure to the development.

- The development frontages will provide visual interest by having an animated approach to the design of windows and doors (fenestration). It will focus on creating enclosure to the green corridors and edges, by linking a series of detached properties with garages and additional accommodation. Generally, these green corridors will be overlooked by frontages of clusters of predominantly lower density and lower rise new homes, to allow for the sensitive nature of the green spaces and landscape rural edges. Medium and lower density homes will also help to reduce light spill onto the more sensitive green corridors and help avoid local conflicts with the ecological habitats, in particular bat foraging areas. These linear spaces also provide for a broad range of amenity, play and SuDS provision as part of the water management of the site. The landscaped sensitive edges of the site provide an interface between the development and the countryside to the west of the site. Clusters of housing frontages providing a lower density feathered edge to the development, whilst providing natural surveillance of the linear green spaces and buffer planting.
- Chaulden North - medium and higher density housing focused along the primary street in close proximity to Community Hub. Medium to higher density residential areas, focused off the Primary Street that runs through the centre of the development. Whilst this is a subtle drop in densities from the Community Hub, it also considers the need to have sufficient densities within a 400m walkable distance of the key public transport corridors. It also considers the retention of key landscape characteristics, such as the spaces created by the current hedgerow features, opportunities for SuDS and open space, whilst also maintaining key wildlife corridors. This identity area shows the core of the housing led areas, with medium to higher residential-led areas at densities of 35-45 dph. The development will also respond to the existing strong landscape characteristics in terms of vegetation and landform. These areas sit within the central development parcels between the linear green spaces of the development.
- Pouchen Park - linear multi-functional parkland space, including local amenity, cycle and pedestrian links, sustainable drainage and play space. This identity area identifies the green space that runs both east west and provides the eastern boundary to the southern part of the development. The strong inter-relationship between built form and green infrastructure gives this character area a strong sense of place. This primary green infrastructure provides the important green web to the development and fosters informal connectivity for pedestrians and often cyclists, enhancing local biodiversity and improved connectivity from western Hemel Hempstead to the countryside to the west. This identity area consists entirely of public open space, a large multifunctional parkland to the south that runs east west and adjacent to the southeast boundary. It is an important strategic open space, providing visual amenity to homes overlooking the park, as well as routes for pedestrians and cyclists, and cyclists, recreational opportunities and a variety of wildlife habitats.
- Chaulden South – a cluster of lower and medium density development set within a strong landscape, located in the most southerly and lower part of the

site. This residential area sits east of Pouchen End Lane and north of the Bulbourne Valley and the nearby village of Bourne End. Therefore, Chaulden South seeks to respond to some of these nearby characteristics of rural and edge of urban settlements. The development grain is less formal than the majority of the development to the north of the character area and creates a more organic street layout, including the introduction of more rural features such as the “farm courtyard” development typology. The area also has a strong sense of place due to proximity to Pouchen Park to the north and east, which therefore helps to create a strong landscaped setting.

- This is a medium density area, which provides a direct relationship with and overlooks the linear park (Pouchen Park). Its hierarchy of multifunctional green space helps to define the setting and structure to the development. Building frontages will have an animated design approach to fenestration (windows and doors) and more informal street frontage. It will focus on creating enclosure to the edge of the park by linking a series of detached and linked properties with garages and additional accommodation. This area is also much less formal than other character areas within the development since there is no Primary street and includes the greater use of Lanes and occasional shared space connected directly from the north-south spine of the Residential street. There is also no formal avenue of trees running along the main connecting street, however the use of incidental street trees and groups of trees within the network will also add to the organic nature of the development.

9.7.13 In addition to the main identity areas set out above, a sub-character area - Rural Interface is identified which relates to the rural edges and corridors.

#### *Layout*

9.7.14 The illustrative masterplan shows a layout, which is based on a clear hierarchy of streets, and pedestrian/cycle routes, which create strong east-west routes linking Hemel Hempstead and the site to the countryside to the west, as well as green corridors to the north and south. This layout is shown in detail within Figure 8 of the Transport Assessment, which details the onsite road hierarchy. The block structure encourages ease of movement by foot and a permeable design that also incorporates three existing public rights of way. Building frontages will focus activity on the edges of the development plots, ensuring and supporting the perimeter block structure and the approach to façades and access. The layout has been designed to ensure that active frontages overlook all key open spaces and public areas, to provide natural surveillance, to aid security and to foster a sense of ownership. This arrangement is reflective of the principles established within the adopted LA3 Master Plan and Policy LA3 of the Adopted Site Allocations DPD.

9.7.15 The visual setting of the proposals has been an important consideration. Structural landscape buffers are provided along the western boundary of the site to conserve the rural character of Pouchen End Lane and generous areas of woodland planting and existing hedgerows will soften views of new housing when seen from the south. The retention of visual connectivity with the wider countryside is important however, and the incorporation of strong east west and north-south corridors in terms

of roads and linear public open space optimises the potential for views across the Bulbourne Valley, in accordance with adopted design principles.

9.7.16 The layout of the open space generally proposes linear spaces in accordance with the provisions of the green infrastructure plan shown at Plan 6 of the LA3 Master Plan. This encourages the establishment of wildlife corridors, particularly through to Shrubhill Common and to the countryside to the west. Furthermore, this encourages walking and cycling in these areas with a clear separation to areas shared with cars.

9.7.17 The site incorporates a large linear park through its centre (Pouchen Park) as well as a number of smaller recreational spaces, including a community garden adjacent to the primary school and Community Hub. These open space proposals include the incorporation of a Neighbourhood Equipped Area for Play (NEAP), two Locally Equipped Areas for Play (LEAP), a shared common games area (SCGA) a trim trail and an outdoor gym. The open spaces, including SuDS basins, also provide the opportunity for informal play, with the incorporation of logs and bunds for example.

9.7.18 The gypsy and traveller site is located in the south-west corner of the site, consistent with the Council's adopted LA3 Masterplan. It has been the subject of an illustrative layout to show that the quantum proposed can be successfully accommodated within the site area. This layout has been produced with reference to relevant Government guidance in the form of Designing Gypsy and Traveller Sites – Good Practice Guide. The County Council's Gypsy and Traveller Liaison officer through pre-application discussions has agreed this approach. The proposed access via Chaulden Lane, in accordance with the Council's adopted LA3 Masterplan (Paragraph 5.31), allows early provision of the gypsy and traveller site as required by the Development Plan. The pedestrian and cycle connections to the primary school and community hub within the central part of the development allows good access from the gypsy and traveller site to the proposed community facilities in the development.

9.7.19 A foul water pumping station is also located in the south-west corner of the site and will be accessed via the same vehicular access as the gypsy and traveller site. A pumping station is required to allow for the provision of a rising main which will allow foul water from the southern part of the site to be connected to and to be drained by the sewerage system in the northern part of the site which links to the existing sewerage network which serves Hemel Hempstead.

9.7.20 In order to maximise the number of dwellings, which can drain by gravity, pumping stations are normally located at the lowest part of development sites. It is for this reason that the proposed location in the southwestern corner of the application site has been chosen. The pumping station will be constructed to adoptable standards set out in 'Sewers for Adoption' 7<sup>th</sup> edition by WRc plc, which comprises of the relevant design and construction guide for developers for this type of facility.

9.7.21 The issue of pumping stations is addressed in Part D. Section D.1 of the above document, which states that the minimum distance of pumping stations from habitable buildings in the worst case (Type 3) should be 15 metres. The pumping station site plan shows the proposed location of the pumping station and the associated 15m buffer area, which is contained within the application area and does not extend onto

adjoining third party land. The proposed location of the pumping station and its associated buffer area is consistent with the required standard as set out the attached guidance 'Sewers for Adoption'.

9.7.22 In terms of parking, it was agreed at pre-application stage that, owing to the age of Appendix 5 of the Saved Local Plan which set out parking standards, it would be reasonable to use these as a basis for establishing levels of provision rather than a rigid standard. The submitted Planning Statement and Transport Assessment set out a new set of maximum residential parking standards that have been established for the LA3 development. This approach has been agreed with officers and the Highway Authority. The proposed parking standards for the development are set out below.

Accommodation	General Provision	Maximum Provision (Including Garages)
1 Bed Flat	1 Space	NA
2 Bed Flat	1 Space	NA
2 Bed House	1.5 Spaces	NA
3 Bed House	2 Spaces	3 Spaces
4+ Bed House	2-4 Spaces	6 Spaces

9.7.23 The parking shown in Phase One is in accordance with these standards and is set out below:

Allocated parking total	(759 spaces)
Garage spaces	(182 spaces)
Allocated spaces	(577 spaces)

Visitor parking (95 spaces)

9.7.24 For other residential phases the quantum of car parking spaces will be reflective of these standards, but the exact number will be set when the final number of dwellings and mix have been established.

9.7.25 It should be noted that proposed garages must meet the following minimum internal dimensions to count towards the parking provision and accommodate cycle storage:

- Standard single garage = 6m x 3m (internal measurement)
- Standard double garage = 6m x 6m (internal measurement)

9.7.26 Visitor parking is to be provided throughout the proposed development in convenient and appropriate locations. Cycle storage will be provided throughout the proposed development in secure and convenient locations, in either secure cycle stores or private garages.

9.7.27 In terms of parking for the community hub, care home and school standards are outlined within the Transport Assessment and Design and Access Statement. A shared parking strategy will need to be considered for the Community Hub that is reflective of the proposed uses, which will include a Community Building, Retail Uses

and School drop-off. Dual-use parking will be provided in and around the community hub, creating drop off space for local facilities and parking within the square, as well as additional parking to the rear of adjoining local centres uses. A future reserved matters application for this area will be reflective of these standards, but the exact quantum of parking spaces will be dependent on the precise floor space of each use present.

9.7.28 Indicative parking provision is 79 public spaces, plus dedicated parking for the primary school and elderly care home. This is considered a good level of parking provision overall for the size of the community hub and the range of uses proposed. As referred to above, final levels will be set at reserved matters stage. An indicative breakdown is set out below:

Community Square - 35 spaces  
School - 26 spaces  
Nursery - 9 spaces  
Mixed- use including convenience store - 15 spaces  
Community Building - 20 spaces  
Elderly Care Home - 31 spaces

9.7.29 School drop off would be provided in the form of parking bays within the shared use community square. A dedicated staff and visitors car park is provided within the curtilage of the proposed school. This could accommodate up to circa 26 cars.

9.7.30 The layout for the site as a whole is not for determination at this stage. However, on balance it is considered that the illustrative masterplan submitted, along with relevant parameter plans and the Urban Design Framework, demonstrate that the design has incorporated the key relevant site-specific principles within the Adopted Site Allocations DPD and LA3 Master Plan, as well as more general design considerations with Core Strategy Policies CS10, CS11, CS12 and CS13. The Urban Design Framework has addressed a number of concerns raised by officer's in relation to urban design and has resulted in improvements to the layout of the development which will help to ensure that the adopted LA3 masterplan principles are more successfully demonstrated at the site.

9.7.31 The Phase One Composite Site Plan shows a layout that is in keeping with the parameters established within the illustrative masterplan and parameter plans as a whole and those principles within the DAS and Urban Design Framework. As above, the Urban Design Framework has addressed a number of concerns raised by officer's in relation to urban design in Phase 1 and has resulted in improvements to the layout of the development and the Gateway in particular. Furthermore, the layout reflects all relevant set back distances in order to ensure that appropriate residential amenity is guaranteed for all. As such, it is considered that the proposals are now, on balance, in accordance with the guidance and principles set out within Policy LA3 of the Adopted Site Allocations DPD and the LA3 Master Plan, as well as Core Strategy Policies CS10, CS11, CS12 and CS13.

## *Massing and Scale*

9.7.32 When considering the need to ensure effective enclosure of streets the Design and Access Statement, supported by the Urban Design Framework, states that streets should not be governed by highways and the movement of vehicles. Streets, as opposed to roads, are the spaces between buildings. The character of a street is governed by how buildings and structures help to enclose the space. A positive sense of enclosure and the associated activities can combine to create an interesting environment. It is therefore important to control the position of building lines and frontages carefully within the street, to create a more continuous sense of enclosure. The heights of buildings also need to respond to the width of the street and the role of that street and public space. Taller buildings (above 2.5 storeys) will be given greater emphasis located on the priority spaces and routes, such as the community square.

9.7.33 When considering elevations and rooflines, the Design and Access Statement confirms that façades, which form the primary frontage within a block, will focus on creating an active frontage, with the number of pedestrian entrances maximised wherever possible. Attention will be paid to the impact of new development on surrounding properties, particularly existing properties surrounding the site. Impact will be minimised and any significant impact avoided. Ground floors on commercial properties may be higher than standard residential floor heights, but must avoid large blank ground floor frontages in public areas to help give a 'human scale' to the street, including on those properties with light industrial uses. Rooflines should create subtle changes in scale within the street scene, creating instances of small-scale adjustments in height to emphasise corners and feature buildings. Greater contrasts in height can be created where a landmark feature is desirable, such as within the Community Hub.

9.7.34 The proposed building heights are detailed within the Design and Access Statement and the overall building heights parameter plan (Drawing No. PP05 (Rev:L) and these vary across the site based on design considerations. Taller buildings of up to 4 storeys, or up to 15m to the ridgeline, will be accommodated in and within close proximity to the Community Hub. Medium heights of up to 3 storeys, or 13m to the ridgeline, are located broadly towards the centre of the masterplan site, at key locations within the proposed phases of the development. Lower heights of 2 storeys, or up to 10m to the ridgeline will be accommodated along sensitive edges, as per the suggestions of the Landscape and Visual Character Assessment. The majority of the proposed development will be 2 or 2.5 storeys in height however, including around the periphery of the site and adjacent to neighbouring development. When combined with the screening proposed as part of the landscaping strategy, this will help to ensure that there will be no significant adverse effects on the residential amenity of neighbouring properties through visual intrusion or overbearing impact in accordance with Core Strategy Policy CS12.

9.7.35 These height parameters have been assessed as part of the Landscape and Visual Impact Assessment, the results of which are discussed later in this report. The height parameters have been informed by the Landscape and Visual Impact Assessment and are considered appropriate and acceptable. The proposed building heights are considered to strike a good balance of ensuring good urban design throughout the scheme, whilst being sensitive to surrounding receptors, including neighbouring properties and the surrounding countryside.



9.7.36 The submitted Phase 1 Building Heights Plan demonstrates that the Phase 1 element of the development respects the parameters set for the wider site. There is a maximum height of three storeys on this element of the site, which reflects that it is a residential area. The heights on the eastern edge of the development, closest to existing development are at two storey, reflecting the need to respect the amenity of existing local residents in accordance with Core Strategy Policy CS12.

### *Appearance*

9.7.37 The architectural approach for the proposed development is set out in the Design and Access Statement and supported by the Urban Design Framework. This confirms that a priority for such a development of this scale is to deliver a co-ordinated variety of architectural styles with a common palette of materials, colours and textures. This is achieved with defined character areas (identity areas), which creates subtle changes in building form and landscape treatment throughout the development. The development should avoid any stereotypical 'estate' feel and be responsive to the varying characteristics of the site. The Design and Access Statement and Urban Design Framework confirm that the materials palette chosen focuses on a range of local materials, with a variety of colours and textures to ensure appropriate variety. However, a common theme local to the area will be the use of local red/orange bricks, render and plain tiles, with consideration to the occasional use of high quality metal roofs on commercial or community premises, such as the primary school for example.

9.7.38 Architectural detailing should show clear reference to local Hertfordshire vernacular styles, but poor copies/pastiche will not be promoted. A more modern, contemporary approach is also appropriate, if it responds to vernacular proportions and materials and is part of a local mix.

9.7.39 Properties in the early phases will be finished in brick, render, and tile. Appropriate design approaches will be employed for the primary school, community building, elderly care home and other key buildings. The materials for landscape and informal open spaces will respond to the need to retain existing vegetation where possible, creating a legible green neighbourhood that reflects the identity areas within the scheme and the rural context to the west. The road design balances highway safety and operation with wider design considerations to ensure high quality design, in the use of surface materials and hard landscaping for example.

9.7.40 In terms of Phase 1's appearance this is to be considered in detail. The design principles inherent within Policy LA3 of the Adopted Site Allocations DPD and LA3 Master Plan state that the character of buildings in the Chiltern area should be used as a guide for attractive design and traditional materials such as red brick, clay tiles and timber boarding should be used where feasible. Accordingly The Phase 1 Materials Plan demonstrates that the materials proposed are reflective of the traditional ones identified in the Policy LA3 principles. However, in order to add further interest to the streetscape further detailing such as render to first floors and some dwellings with grey slate tiles have been incorporated. The dwellings overlooking the Gateway have been amended to assume a subtly more contemporary take on the traditional in order to ensure high quality design at this key entrance to the development. Whilst they maintain traditional form, they now have a more

contemporary feel and appearance inspired by successful developments completed elsewhere by the applicants in similar contexts to the LA3 site. The appearance of the proposed dwellings within Phase 1 then transitions sensitively back to the more traditional as you move away from the Gateway further into the development.

9.7.41 Section 12 of the NPPF places great emphasis on the role of good design in place making. While the level of detail provided between the full and outline elements differs, it is considered that, on balance, following the improvements which have been made to the design following the urban design workshops and the submission of the Urban Design Framework, the design proposed demonstrates that the proposals are in accordance with the provisions of the NPPF, Core Strategy Policies CS10, CS11 and CS12, the Site Allocations DPD, the LA3 Masterplan and other guidance when it comes to urban design and design.

## 9.8 Housing Mix

9.8.1 Core Strategy Policy CS18 – Mix of Housing states that new housing development will provide for a choice of homes, including a range of housing types, sizes and tenures, as well as housing for those with special needs and policy compliant levels of affordable housing. The policy goes on to state that the mix and type of housing within development will be guided by evidence such as Strategic Housing Market Assessments (SHMA) and other site-specific considerations. Local Plan Policy 18 also relates to the size and type of new dwellings to be provided and places particular emphasis on smaller units and lifetime homes.

9.8.2 The mix of dwellings for the outline element of the scheme will be determined at the relevant Reserved Matters stage. This will draw on the most up to date evidence on housing need at that time. For Phase 1, the proposed mix is set out in Section 5 of the Planning Statement. This has been developed with reference to the housing need set out within the South West Hertfordshire SHMA. It has been amended and updated following consultation with our Strategic Housing Team and the latest housing mix is set out below:

	<i>TOTAL UNITS</i>
<i>OPEN MARKET</i>	
<i>1 bed flats</i>	4
<i>2 bed flats</i>	28
<i>2 bed houses</i>	35
<i>3 bed houses</i>	242
<i>4 bed houses</i>	320
<i>5 bed houses</i>	31
<i>OPEN MARKET TOTAL</i>	660
 <i>AFFORDABLE</i>	
<i>1 bed flats</i>	102
<i>2 bed flats</i>	105
<i>2 bed houses</i>	198
<i>3 bed houses</i>	35
<i>4 bed houses</i>	0

<i>AFFORDABLE TOTAL</i>	440
GRAND TOTAL	1100

9. 8.3 The proposed housing mix for Phase 1 is set out below:

	<i>TOTAL UNITS</i>
<i>OPEN MARKET</i>	
<i>1 bed flats</i>	0
<i>2 bed flats</i>	12
<i>2 bed houses</i>	21
<i>3 bed houses</i>	98
<i>4 bed houses</i>	92
<i>5 bed houses</i>	5
<i>OPEN MARKET TOTAL</i>	228
 <i>AFFORDABLE</i>	
<i>1 bed flats</i>	9
<i>2 bed flats</i>	33
<i>2 bed houses</i>	21
<i>3 bed houses</i>	52
<i>4 bed houses</i>	7
<i>AFFORDABLE TOTAL</i>	122
 GRAND TOTAL	 350

9.8.4 It is considered that the mix proposed is reflective of the need across the Borough to accommodate a high proportion of 2 and 3 bedroom units across the development, as well as the Borough specific need to maintain a level of 4+ bed dwellings. Furthermore, the affordable housing proposed incorporates high numbers of smaller units, including two beds, which is welcomed. However, in order that affordable housing remains integrated with the wider development, a number of larger units are also proposed which corresponds to the SHMA requirement to retain a balance of affordable dwellings.

### 9.9 Affordable Housing

9.9.1 Core Strategy Policy CS19 states that 35% affordable housing will be provided on new developments. However, the 40% requirement set out within the Site Allocations DPD is more up to date and is therefore considered to represent a more suitable requirement for the development at LA3. This position was agreed with the developers at pre-application stage.

9.9.2 The proposals provide for up 40% affordable housing. This will be secured via a S106 agreement. The tenure split of this provision will be 75% affordable rent / 25% intermediate housing in accordance with Policy CS19. The tenure split has been amended through negotiation with the developers and the Council's Strategic Housing Team to ensure compliance with Core Strategy Policy CS19. A 50/50 split was originally proposed which was not considered acceptable.

9.9.3 The location of affordable housing within the majority of the scheme is for determination at the Reserved Matters stage due to it being located within the Outline element of the application. However, it is to be fixed in terms of the Phase 1 area (full element of the application). It is considered that the proposal satisfactorily demonstrates that the scheme avoids concentrating affordable housing in specific areas of the site and instead proposes a clustered approach, in accordance with the requirements of the Affordable Housing SPD. Officers are satisfied with this approach.

9.9.4 It is noted that the level of affordable housing proposed for Phase 1 is slightly below the overall 40% figure put forward (approximately 35%). However, this slight deficit will be made up in outline phases by the provision of greater than 40% affordable housing in these phases, ensuring that the policy compliant level of 40% affordable housing will be achieved across the development when taken as a whole. This will be secured via the S106 agreement.

9.9.5 The development incorporates a 70-bed affordable elderly care facility for older people (C2/C3 Use) located within the Community Hub on the Site. This responds to a need for residential care provision for older people specified within the SHMA, which represents the most up to date assessment of future housing needs in the area. This is in accordance with the lifetime homes requirement of Local Plan Policy 18. Whilst there were initially questions over whether this type of accommodation could genuinely be considered as 'affordable housing', further justification has since been provided in the form of a consultants statement and initial expressions of interest from local Registered Providers (RP's) which provides officers with the necessary comfort. The proposals are considered to be 'affordable' and form part of the overall affordable housing provision of 40%.

9.9.6 The Council's Strategic Policy Team are supportive of the inclusion of this facility and have commented as follows:

*'We are supportive of the provision of extra-care elderly housing accommodation (70 beds) generally as part of the mix of housing and also in terms of the mix of affordable housing. It appears that the Strategic Housing team is supportive of the latter. Furthermore, the proposal is of a significant scale to deliver a much wider range of housing than would normally be the case for smaller schemes.'*

9.9.7 As referred to above, the Council's Strategic Housing Team is also supportive of this proposal as part of the affordable housing provision.

9.9.8 The proposed development will secure a high proportion of affordable housing in compliance with the LA3 Masterplan, Site Allocations SPD and Core Strategy Policy CS19. This is considered a significant benefit of the proposed scheme.

## 9.10 Gypsy and Traveller Provision

9.10.1 The proposals include the provision of land for 7 serviced Gypsy and Traveller pitches on a 0.5ha site located in the south-west corner of the site. This corresponds with the requirements of the Site Allocations DPD and the LA3 Masterplan.

9.10.2 The design approach will be in accordance with government guidance contained within the DCLG publication “Designing Gypsy and Travellers Sites - Good Practice Guide” (May 2018). Primary vehicular access will be via Chaulden Lane to the south of the site and additional pedestrian and cycle provision will be located to the north -east of the Gypsy and Travellers site to allow access to local facilities provided by the wider development.

9.10.3 Policy CS22 of the Core Strategy – New Accommodation for Gypsies and Travellers states that the target for new pitches will be set by the most recent Gypsy and Traveller Needs Assessment agreed by the Council and that this will be met by the provision and management of new sites. The policy also set requirements for new provision, as below:

- i. distributed in a dispersed pattern around settlements;
- ii. located close to facilities;
- iii. of varying sizes, not normally exceeding a site capacity of 15 pitches;
- iv. planned to allow for part occupation initially, allowing subsequent growth to full site capacity; and
- v. designed to a high standard with:
  - a. an open frontage similar to other forms of housing; and
  - b. landscaping or other physical features to provide an appropriate setting and relationship to existing residential areas.

9.10.4 The Council’s Strategic Policy Team has assessed the proposals and welcome the provision of the serviced 7-pitch site. It has commented as follows in this excerpt from its statement on the application proposals:

*‘We welcome the commitment of the applicant to deliver a serviced traveller site of 7 pitches. It is important to secure a traveller site in order to meet our short-medium term identified need under the 2013 traveller need assessment:*

<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/hg8-travellers-needs-assessment-trdc-and-dacorum-2013.pdf?sfvrsn=0>

*In addition, the LA3 allocation is one of only two identified locations (the other being LA1 Marchmont Farm (5 pitches)) where this need can actually be met in a planned manner.*

*We note that the master plan makes no specific reference to a separate access from Chaulden Lane to serve the traveller site in the policy requirements. However, it is suggested that this access could be supported in the background text to the master plan, subject to further testing at the application stage (see para. 5.31):*

*5..28 A gypsy and traveller needs assessment was completed in January 2013 together with Three Rivers District Council. In order to meet local needs and fulfil its statutory duties, the Council require that a small Gypsy and Travellers site is made available. There is a need to provide homes for gypsies and travellers, and LA3 is an acceptable location in planning policy terms, provided that certain criteria are met.*

*5.29 Policy LA3 in the Site Allocations DPD requires that 7 pitches are provided and that the phasing of the site seeks to deliver the Gypsy and Traveller Pitches within an early phase, subject to technical and viability considerations, to ensure a 5 year supply of Gypsy and Traveller provision.*

*5.30 The site should be designed in accordance with the Department for Communities and Local Government design guidance or any replacement advice (available at):*

*[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/11439/designinggypsies.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/11439/designinggypsies.pdf)*

*5.31 The location of the site is shown indicatively in the south west corner of the land (see Plan 9) and it is assumed that access will be secured directly from Chaulden Lane, subject to final confirmation at the planning application stage regarding road capacity. The reference to 'potential location' in Plans 5 and 9 refers to the location of the gypsy and traveller pitches within the site rather than the potential for such provision at site LA3. The exact area of land will be dependent on detailed design but is likely to be in the order of 0.5ha.*

*The County Council (Highways) has supported the principle of Chaulden Lane providing direct access to serve the traveller site. The access would avoid associated traffic travelling through the main residential area and, in reality, it would only need to serve a low amount of traffic movement connected with the 7 pitches.*

*I understand that you have already received the views of the County Council's Traveller Liaison team, although these have been limited in nature given that they are no longer being directly involved in managing new traveller sites.*

*While the details of the traveller site are still to be finalised, we note that its indicative location in the south western quadrant of the site follows that in the Master Plan (Plans 5 and 9). We acknowledge that there has been local pressure to relocate this to a more central location, but we consider that the present location remains a reasonable one.'*

9.10.5 The County Council's Gypsy and Traveller Liaison Officer has also been consulted on the proposals. He has confirmed that he is satisfied with the location of the proposed site, together with the proposed layout. The County Council runs several sites set out in a circle layout like that proposed and he has confirmed that this layout works well. He is also satisfied with the separate access onto Chaulden Lane. He confirms that he feels that travellers will be happy with the separate access due to the logistics of delivering mobile homes to sites. This can cause disruption to the settled community, which would be prevented by the separate access. He is also satisfied with the proposed pedestrian and cycle connections to the wider development and the community hub.

9.10.6 The proposed location of the Gypsy and Traveller site complies with the requirements of the Site Allocations DPD and the LA3 Masterplan. It is considered an appropriate location. It is contended that the site forms an integrated part of the wider LA3 development and is linked to the wider development via footpath and cycle links,

whilst having a separate vehicular access point. It's location in the south of the development is considered to strike a good balance between ensuring good levels of accessibility to the wider LA3 facilities (such as the primary school and community hub), whilst ensuring that future residents of the site will be able to continue to maintain their culture and way of life.

9.10.7 The proposals are considered to comply with Core Strategy Policy CS22 in this regard, along with the requirements of the Site Allocations DPD and the LA3 Masterplan.

#### 9.11 Provision of Non-Residential Development – Community Facilities

9.11.1 Core Strategy Policy CS23 – Social Infrastructure relates to the provision of social infrastructure within the Borough. The explanatory text of the policy outlines that this infrastructure includes education, health, community and leisure facilities. The policy states that new developments will be expected to contribute towards the provision of community infrastructure to support the development. In the case of larger developments, this could be in terms of the provision of land and/or buildings on site to accommodate required facilities or financial contributions towards off-site provision.

9.11.2 The requirement for new development to provide contributions towards the provision of on-site, local and strategic infrastructure required to support the development is set by Core Strategy Policy CS35 – Infrastructure and Developer Contributions. The policy outlines that contributions will be required unless existing capacity in relevant infrastructure exists and financial contributions will be used in accordance with needs set out in the Infrastructure Delivery Plan. This policy has some overlap with the Community Infrastructure Levy, which has been adopted by the Council, although this will not be sought for development on this site, as the site has been CIL rated zero.

9.11.3 The planning application is for a mixed-use development and, as such, proposes a range of other uses on top of the residential provision discussed above. Core Strategy Policy CS23 – Social Infrastructure encourages the provision of new services and facilities for the community to be located to aid accessibility and allow different activities. The policy specifies that larger developments may include land and buildings to provide social infrastructure as well as making contributions as part of planning obligations where necessary. The Adopted Site Allocations DPD lists a number of other facilities required as part of the development of the Site as part of Policy LA3 and associated LA3 Master Plan. These include:

- A two form entry primary school;
- A satellite doctors surgery (or contributions towards expansion of existing surgery at Parkwood Drive, Warner End);
- Additional Social and Community Provision, including a community building and nursery; and
- Shops.

9.11.4 The proposed development makes provision for all of the required uses and facilities and it is therefore considered to represent a policy compliant scheme in terms of the mix of built development. The proposals are considered to meet the

requirements of Core Strategy Policy CS23. The proposed facilities will be provided in the proposed Community Hub and include:

- a site for a two form entry primary school and associated nursery with playing fields on a site of up to 2.1 hectares (including CGA);
- specialist affordable accommodation for the elderly with up to 70 rooms (C2 or C3);
- an up to 450 sq. m convenience store (A1);
- three up to 100 sq. m retail units (A1, A2, A3, A4 and A5);
- a community facility of up to 175 sq. m (D1);
- a local retail use of up to 100 sq. m (A1, C3 and D1);
- a children's day nursery of up to 450 sq. m (D1).

### *Primary School*

9.11.5 The proposed development includes land for a two-form entry primary school to be located within the heart of the community hub. This will also provide opportunities for a pre-school and/or nursery at the school. The applicants will also provide a S106 education contribution of £8.9 million to allow the Education Authority, Herts County Council, to construct and deliver the school at nil cost to the County Council. Following negotiations, this figure has been agreed with the County Council as sufficient to deliver the new school.

9.11.6 Final proposals for the school development will be a matter for assessment as part of the Reserved Matters applications and will require further discussion between the Applicant, Education Authority and the Council. However, key design requirements include:

- Primary school to have a strong relationship with and frontage to the Community Hub, with minimal set back (up to 10m).
- School to be provided with adjoining drop off space for children and dedicated on site staff car parking.
- School to be served by dedicated foot/cycle routes to allow for safe routes to schools within the development.
- Vehicular access to be via the Primary Street/ Community Square.
- Maximum building heights of 15m to allow for sports hall.
- High quality architectural approach required, given the visibility of each school, using high quality materials and landscape treatment.

9.11.7 The agreed primary school land and contribution route for education provision follows lengthy pre-application and application negotiations. The details will be finalised in the on-going S106 negotiations, which will ensure that the school is delivered in an early phase of the development as part of the community hub. Both Dacoum and Herts County Councils as Local Planning Authority and Education Authority welcome this respectively. This is a major piece of community infrastructure and should be seen as a significant benefit of the proposed development.

9.11.8 Furthermore, the applicants have agreed to fund the provision of temporary primary education accommodation via a S106 contribution to cover demand arising from Phase 1 of the proposed development until the proposed primary school opens.



The temporary accommodation will be located at a nearby school. The developers have also agreed to fund the provision of additional temporary accommodation to cover a 'bulge' that has been forecast in the education modelling for the development towards the end of the development build out. This will be subject to a review mechanism in the S106 to confirm exactly what temporary accommodation is required in the future. Details of both contributions will be agreed as part of the on-going S106 negotiations.

9.11.9 The provision of the two-form entry primary school and associated temporary accommodation referred to above will ensure that children at LA3 will all have local primary school places. This provision will also reduce pressure on existing local primary schools in West Hemel Hempstead.

#### *Doctors Surgery*

9.11.10 Following lengthy engagement with both the Clinical Commission Group (CCG) and the surgery manager at Parkwood Drive surgery at both pre-application and application stage, it has been agreed that the most effective way to mitigate the additional demand the LA3 development will place on local GP services is to provide a financial contribution towards the expansion of the Parkwood Drive surgery via a S106 contribution. This will allow the surgery to expand to cope with the additional demand. The contribution will be added to NHS England funding to allow suitable expansion of the facility. A contribution of £393,555 will be made, full details of which are set out in the Draft Heads of Terms summarised in the S106 section later in this report.

9.11.11 In providing for proposed education, leisure, retail and employment uses on the site the proposals are considered to demonstrate accordance with NPPF paragraph 104, which state the benefits of providing a range of uses within residential developments to encourage sustainable ways of living.

9.11.12 In addition to the provision of land and buildings as specified above, the proposal will make contributions (via S106), to other infrastructure in the locality required as a result of the development, in accordance with paragraph 56 and 92 of the NPPF.

9.11.14 The site does not include any playing field provision, save for that within the primary school, which is consistent with the LA3 Master Plan. This matter will be addressed within the S106 in the form of a contribution towards off-site provision at Warners End and Chaulden. This will be focussed on the improvement of local sports pitches/facilities close to the site. The primary school sports pitches may also be subject to a Community Use Agreement to ensure shared use. It should also be noted that a Community Use Agreement will cover the proposed Community Games Area attached the primary school.

9.11.15 The proposals are considered to comply with NPPF paragraphs 56, 92 and 104 as well as Core Strategy Policies CS23 and 35. A range of community infrastructure will be provided as part of the proposals and these are considered to represent a significant benefit of the scheme weighing in its favour.

## 9.12 Landscape and Visual Impact

9.12.1 The application is supported by a Landscape and Visual Impact Assessment (LVIA). This has been included as a chapter within the Environmental Statement. The LVIA assesses the impact of the proposals on receptors both on and in close proximity to the site in terms of landscape and visuals based on the submitted parameter plans during both the construction and operational phases.

9.12.2 The study area for the purposes of the visual impact assessment focussed on the 'zone of visual influence', that is the area within which the proposed development would be most visible from.

9.12.3 Landscape effects are a result of physical changes within the landscape, which may contribute to changes in its character and how this is experienced. These effects need to be considered alongside changes already happening within the landscape, which help define the character of it. Landscape character of the wider area has also been assessed.

9.12.4 The assessment of effects on visual amenity takes account of the landscape and visual context and the potential visibility of the proposed development from various types of location. Examples of locations where potential visual effects could occur include settlements and private residences, users of public rights of way, and people using roads. In order to determine where the development would potentially be visible from, a computer generated 'Zone of Theoretical Visibility' was generated. Site visits were then undertaken to judge the extent of the potential visibility in more detail. A number of representative viewpoints were identified upon which to base the assessment. These are locations where there is potential visibility of the site, but are restricted to those areas, which are generally publicly accessible.

9.12.5 The site does not lie within an area designated for its scenic quality, although it is just under one kilometre from the Chilterns Area of Outstanding Natural Beauty (AONB). The site is not within the Green Belt, as confirmed by the Council's Core Strategy and Site Allocation DPD, having been removed as part of the LA3 allocation. The screening effects of landform and existing vegetation ensure that there are no key views of the site from the AONB. Similarly, there are limited views towards the AONB that the development would obscure.

9.12.6 The site is situated within National Character Area 110 Chilterns. The character of the area is described by Natural England, although the assessment concludes that the site itself is not considered typical of the wider landscape character area given its urban fringe location and the effect this has. The Council's Landscape Character Assessment May 2004 shows that two Landscape Character Areas (LCAs) cover the site. The southern part of the site lies within Area 118 - Lower Bulbourne Valley, whilst its northern area lies within Area 120 - Little Heath Uplands. That assessment indicates that the character of these areas is influenced both by the urban edge of Hemel Hempstead and transport corridors along the valley floor.

### *Construction Phase*

9.12.7 The LVIA confirms that there would be inevitable effects on the landscape during the construction phase of the development. However, given the character of the site and the surroundings these are not considered significant. Whilst no footpaths would physically be affected by the construction activity, there are likely to be effects due to the introduction of construction activity into views from these footpaths. In particular, a major indirect adverse effect is predicted on footpath 21 and a moderate adverse indirect effect on footpaths 20 (The Chiltern Way) and 91 during the construction period. Some moderate adverse effects could also occur because of the limited removal of trees from the site to facilitate the construction.

9.12.8 Visual effects during the construction period will also affect the users of footpaths 20, 21 and 91 and will also affect the users of Pouchen End Lane, Chaulden Lane, Little Hay Golf Complex, the Hertfordshire Way, a short stretch of the Grand Union Canal Walk, and Westbrook Hay and Sheethanger Common. However, views from these locations focus on the southern part of the site only. This is because the northern fields are located further back on a sloping plateau, which screens them from views. Glimpsed views from residential properties on streets adjacent to the site are also likely during the construction period given their proximity. Similarly, some views of the site are likely from residents further south at Box Lane and Felden.

9.12.9 It should be noted that by their nature the impact of the effects of the construction phase are time limited to the period of construction only.

### *Operational Phase*

9.12.10 the LVIA assessment confirms that once construction of the development is complete, the effect on the landscape character of the site is considered to be moderate adverse, with residential development becoming a permanent element in the landscape. The footpaths internal to the Site itself would benefit from new surfaces making them easier to use, but these would be within an urban environment rather than the current semi-rural environment.

9.12.11 Without additional landscape mitigation the overall degree of visibility and visual effects would be similar to that of the construction period. This would mean significant impacts relating to: users of the public footpaths that cross the site; users of recreational lanes; footpaths and open access land in the wider area; residential properties immediately adjacent to the site's boundaries; and residential properties in the Box Lane and Felden areas to the southeast.

9.12.12 However, mitigation measures have been defined as part of the development proposals, and are shown in the submitted Environment Statement Parameter Plans, the Illustrative Masterplan and the Illustrative Green Infrastructure Plan, which together confirm the following:

- Retention of the network of mature trees and hedgerows and further supplementing and reinforcing these networks with new planting.

- Compensation for the loss of a small area of native woodland at the Long Chaulden entrance with a larger area of new woodland on the site's western boundary.
- Chalk Grassland: Informal open space within the development will incorporate significant swathes of chalk grassland, creating a chalk down land feel, with occasional scattered shrubs/trees.
- Reptile Receptor Area: An area of open chalk grassland on the western side of the proposed Pouchen Park would be retained as a reptile receptor area. This would be managed so no more than 50% of the entire grassland would be cut in any one year and will be informally demarked with a timber knee rail, and presented as a 'nature conservation area' to justify its likely less well kept look.
- Dry Attenuation Basins (south): Dry basins in the southern part of the site would be managed as chalk grassland, and sown with a calcareous wildflower/grass mix, with chalky subsoils exposed and arisings used to create chalk/'butterfly' banks. No additional topsoil or organics would be added. Any wetter areas would be allowed to develop into calcareous fen/wet flush habitats.
- Dry Attenuation Basins (north): In the northern part of the site, where chalky substrates are not present a similar approach would be taken, but with a wildflower mix suited to the conditions.
- SuDS-Conveyance features: Swales would be treated as attenuation basins, with wet wildflower seed mixes sown. The ditches in chalky areas would be allowed to develop into fen/wet flush habitats where possible.
- Wet Attenuation Basins: The two attenuation basins at the Long Chaulden entrance would be designed to include a variety of vegetation and habitats, including submerged/emergent and marginal plant species at the edges and wet grassland/marsh within the freeboard areas. The detailed design of the pond could also include a 'shoal' of shallower land at the eastern end and areas of deeper water to prevent invasion by reeds and bulrushes for example.
- Retained hedges/treelines: These key wildlife corridors will include reinforcing with under planting and the provision of long grass/wildflower margins where possible. These scalloped margins will create an 'ecotone' gradient, grading from the existing hedgerow through low shrubs, ruderals to long grassland (woodland edge/hedge seed mix). Hedgerows will be trimmed and laid as necessary to ensure the good long-term health of the features. Adjacent to the Chiltern Way, the hedgerow will be reduced to approximately 1.2m in height to enhance natural surveillance and strengthen the hedgerow structure.
- Woodland Mitigation Area: An area of new woodland will be provided adjacent to the site's western boundary to compensate for the loss of a small area of existing woodland close to the Long Chaulden frontage. This will be larger than the area that will be lost.
- Opportunity for community orchard within the Pouchen Park.
- Opportunity for community food-growing garden adjacent to Community Hub.

9.12.13 With these mitigation measures in place, the LVIA concludes that the only significant adverse landscape effect will be on the land use on the site, which will see the introduction of c.36ha of new buildings and associated infrastructure on land that is currently in agricultural use. This point of principle is however not for determination here as the principle of residential development has been established in the Council's adopted Core Strategy and Site Allocations DPD. The c.15.5ha of green infrastructure

that will be incorporated within the scheme will be managed to achieve a more wildlife friendly and attractive landscape than that is currently the case, helping to offset the loss. There will be moderate beneficial effects on the existing footpaths that run through the site through resurfacing to enhance accessibility. Whilst the setting of the paths will change significantly, the new views need not be of lower quality than the existing views.

9.12.14 With regards to residual visual impact, views from the north and east will generally be well screened by existing and proposed vegetation around the site boundaries. The main significant adverse visual effects will be on views from the elevated recreational areas to the south of the site, where the southern and central parts of the development will form a clear element within a wider panoramic view. These views, from Little Hay Golf Complex and Westbrook Hay School, already include a relatively extensive area of Hemel Hempstead as well as some elements of transport infrastructure associated with the A41 and West Coast Mainline railway. The proposed development will therefore appear as a sympathetic extension to existing housing in west Hemel Hempstead in Chaulden and Warner's End. Overall the residual adverse effects here will be 'moderate adverse'. Residents on the eastern side of Pouchen End and within Middle Hill may also experience 'moderate adverse' effects with views of new housing beyond their rear gardens. This will only affect a relatively low number of users/residents however.

9.12.15 The overall cumulative effect of the proposals on landscape and visual amenity is assessed to be limited. Officers are satisfied that the proposals are in broad compliance with Core Strategy policies CS10, CS12, CS25, CS26, CS27 and LA3, as well as Local Plan policies 79, 100 and 101.

### 9.13 Green Infrastructure, Landscaping and Trees

9.13.1 The adopted LA3 Masterplan sets out a number of Green Infrastructure Principles as part of the overall development principles identified. These are summarised below:

- Create a network of green infrastructure through the area via a 'green grid' of open spaces and movement corridors that link with opportunities for direct access to the countryside.
- Establish a central swathe of open space across the development as a green link to Shrubhill Common with a wide tree belt which will assist in retaining a treed skyline when viewed from the south and south east.
- Protect a wildlife corridor along the eastern side of the development adjoining Fields End.
- Reinforce structural planting along existing field boundaries within the Site to create a well-structured development of landscaped compartments with particular emphasis on enhancing existing screening and maintaining a treed skyline.
- Retain an area of open space and associated structural landscaping on the more exposed south facing slopes.

9.13.1 The masterplan for the proposed development seeks to adhere to these principles, with the masterplan's green infrastructure (GI) strategy set out in the Design

and Access Statement. This confirms that the GI strategy seeks to provide a broad range of high quality green spaces and other environmental features. The Site's GI would be a multifunctional resource, capable of delivering both ecological services and quality of life benefits for the new community.

9.13.2 The development's GI would respond both to the Site's existing topography and natural features, which includes trees and hedgerows, as well as to the surrounding landscape and existing footpaths. Key to this would be the establishment of strong, accessible and biodiverse east-west green linkages that connect the development to the countryside beyond. All components of the urban realm (primary school, housing, community and retail) would be set within an extensive network of green spaces. This will help to ensure that the new landscape is both as permeable as possible for wildlife whilst also being easy to traverse by pedestrians and cyclists, within an attractive and tranquil environment.

9.13.3 While the GI would cater for both passive and active recreation, access would be more carefully managed on sensitive wildlife sites, to ensure their conservation interest is retained. The recreation strategy has been strongly informed by the existing biodiversity and the proposals for new habitat creation; the local food growing imperative; and requirement for a multifunctional approach to the SuDS design.

9.13.4 The GI Strategy includes the following core aims:

- Seek to maximise multifunctional uses of open space and natural spaces for a range of benefits relating to biodiversity, climate change, the production of food, economic investment and activity, health, landscape, recreation and well-being.
- Promote connectivity of all types of green space at a range of scales.
- Provide a key element of the sub-region's mitigation strategy in relation to the Habitats Regulations.

#### *Landscape Strategy*

9.13.5 The adopted LA3 Masterplan sets out a number of Open Space Principles as part of the overall development principles identified. These are summarised below:

- Meet Council standards for all types of open space as a basic aim.
- Design and manage the open space for clear, identifiable purposes.
- Use open space to define different parts of the neighbourhood and help distinguish it from Chaulden.
- Arrange the open space to ensure a pleasant, coherent and wildlife-friendly network throughout the neighbourhood.
- Ensure that the layout and design of new sports provision is fit for purpose.

9.13.6 The masterplan for the proposed development seeks to adhere to these principles, with the Landscape Strategy set out in the Design and Access Statement. This states that the Landscape Strategy incorporates and enhances the important existing landscape structure of hedgerows and trees and responds to the issues arising from the Landscape and Visual Impact Assessment. The landscape and open

space proposals will provide an attractive setting for the new development, maintaining and enhancing existing habitats through the retention of existing native vegetation and creation of new grassland, woodland and ponds. A range of types and sizes of spaces are incorporated across the Site. These include formal green spaces, which also act as east-west routes across the site; formal green spaces, which act as a focal point for residential development; and informal spaces along key landscape corridors such as a proposed linear park that runs centrally east west.

9.13.7 The Landscape Strategy for the proposed development seeks to:

- Create a connected network of green corridors throughout the site, allowing for pedestrian, cycle and wildlife movement. East-west corridors are particularly important, providing links from Hemel Hempstead to the countryside and softening views from the south. A network of pedestrian and cycle routes within the proposed open space network will link in with Pouchen End Lane to the north and west, The Avenue, Squirrel Chase, Chiltern Way and Long Chaulden to the east and Chaulden Lane to the south, encouraging sustainable methods of transport.
- Deliver a range of multifunctional green spaces and clear open space hierarchy and network of varied spaces, providing opportunities for children's play, recreation paths, nature conservation and Sustainable Urban Drainage Systems (SuDS).
- Acknowledge the removal of some of the young native tree plantations within the site, but retain the network of mature trees and hedgerows and further supplement and reinforce these networks with new planting.
- Compensate for the loss of a small area of native woodland at the Long Chaulden entrance, with a larger area of new woodland on the site's western boundary.
- Deliver a street tree hierarchy, which is linked, to the movement hierarchy.
- Allow space to create a network of new tree planting within the built area, helping to integrate it into its landscape setting and softening the outline of buildings.
- Retain Category A and B trees on the site wherever possible and incorporate them within the open space network.
- Retain and actively manage all hedgerows other than where their removal is required to allow for access.
- Deliver a high quality hard and soft public realm across the proposed development, which is wholly inclusive in its design, the character of which progresses from urban to rural, east to west across the site.

- Deliver a new legible communal space adjacent to the Community Hub with direct connections with the existing community.
- Deliver opportunities to improve the biodiversity assets by providing for the existing habitats which are, or likely to be present and by creating new habitats.
- Deliver both natural and semi-natural landscapes, connected to the SuDS and biodiversity strategy.
- Minimising changes to the rural character of Chaulden Lane, retaining as much of the existing trees, and hedges along it as possible.
- Create an attractive entrance to the development at Long Chaulden, incorporating open spaces with native tree and shrub planting and ponds.
- Provide strategic woodland planting along the site's western boundary, to limit views from Pouchen End Lane and the countryside beyond.
- Provision of two new ponds of permanent water as part of the Sustainable Urban Drainage System, together with numerous dry attenuation basins and swales.

9.13.8 The public spaces around the Site are generally multifunctional and have been designed to maximise biodiversity whilst providing opportunities for recreation, play and food growing. The masterplan includes the following landscape and open space typologies, based on definitions set out in (now former) Planning Policy Guidance Note 17 on Sport, Open Space and Recreation (and is still considered to offer useful guidance in this respect) & Dacorum Borough Council's Open Space Study March 2008:

- Amenity Green Space - These areas consist of informal recreation spaces and green spaces in and around housing and village greens. These areas predominantly consist of regularly mown amenity grass with standard trees, together with areas of ornamental shrub planting around adjacent parking areas for example.
- Natural and Semi-natural Green Space - These areas have recreational value for walking and informal play, but are designed to maximise biodiversity opportunities. This can include woodlands, scrub, meadows, wetlands and open water. Within LA3, these areas can be subdivided into four sub-categories:
  - Meadows with trees
  - Existing hedges & trees with grass margins
  - New woodland & grass margins
  - Permanently wet ponds
- Children and Young People: Equipped Areas of Play - Equipped play areas including LEAPS (Locally Equipped Areas for Play) and NEAPs



(Neighbourhood Equipped Areas for Play) as well as informal hanging out areas/teenage shelters. Equipped areas will be designed to Fields in Trust standards, including fencing, safer surfacing and a variety of play experiences. Equipment is generally timber, to contribute to the semi-rural character of the area.

- Children and Young People: Informal Areas of Play - These areas are designed to allow for informal play and exploration, with ground modelling often associated with dry drainage basins. Play can be encouraged through the incorporation of naturalistic features such as timber stepping posts and beams, boulders and stepping-stones. Grass will generally consist of native meadow species to enhance biodiversity.
- Community Food Growing - Two areas are provided for potential community managed food growing. These consist of a community food garden adjacent to the Community Hub and Primary School and a Community Orchard within the Pouchen Park area. The community food garden could be a shared facility with raised planting beds designed to be accessible to all ages and levels of mobility. These could be planted with fruit bushes, annual vegetables, and salad varieties. The Community Orchard could predominantly consist of apple species typical of those found historically in the Chilterns area, but could also include other fruits such as plums, pears and cherries.
- Parks and Gardens - These areas can include both urban and country parks and tend to be the focus of community activities. Whilst a number of the open spaces within the development could be categorised as a 'Park or Garden', given their multi-functional use, the most obvious area is the small park next to the Community Hub, which is a very accessible space close to the school, shops and bus route. This also includes the largest play area within the development together with the community food garden.
- Outdoor Sports Facilities Community All Weather Pitch - This hard-surfaced pitch lies adjacent to the primary school and will be a shared facility. Lockable gates will limit access to school use only during school hours and then community use at all other times. The court will be marked out to allow a variety of sports uses such as 5-a-side football and basketball as well as informal skateboarding.
- Outdoor Sports Facilities: Primary School - The school grounds will include a grassed recreation field for school use only. This can include junior pitch(es) for football.

9.13.9 The masterplan includes a large linear park – Pouchen Park – that comprises of a significant piece of multifunctional public open space for the development and local area. This wide linear park runs in a north-south direction adjacent to the southern part of the site's eastern boundary and in an east-west direction through the centre of the site. It is truly multi-functional space, including:

- Reptile receptor/ mitigation area

- Existing Public Footpath 91 (east-west direction) widened to accommodate bicycle use
- Dry attenuation basins, some with informal play
- Swales
- New woodland
- Community Orchard
- Local Equipped Area for Play (LEAP)
- New cycle/ pedestrian route in north/south direction

9.13.10 This space will be overlooked by adjacent housing, which will provide natural surveillance as well as an attractive setting to the homes. Views from the park itself will include the open valley side to the south of the River Bulbourne, including Westbrook Hay.

9.13.11 The western and northern edges of the site will incorporate a significant green corridor, that can allow for tree planting to help soften views of the site from the wider countryside, as well as space for sustainable drainage features, a pedestrian footway and part of the trim trail. Adjacent housing set behind private drives will overlook the space, providing natural surveillance. The space will be an important nature corridor and include native trees, shrubs, grass and flower species.

#### *Tree Strategy*

9.13.12 The proposed Tree Strategy is set out within the Design and Access Statement. The strategy retains the established individual trees and tree groups, including those that are subject to Tree Protection Order (TPO) 453 along the northern boundary of the site. The tree strategy seeks to reinforce this existing structure and is inherently linked with the proposed movement networks. The majority of new tree planting will be native species of local provenance that will provide green link corridors for a wide variety of wildlife. New hedges will also be introduced throughout the site that will assist in enhancing the site's biodiversity richness.

9.13.13 The tree species to be used across the site will seek to reinforce the movement hierarchy and legibility. As such, the strategy is as follows:

- Large street tree species are to be used to the principal road corridors, with medium tree species proposed to the secondary and tertiary routes.
- The selection of tree species based on those found locally and which encourage biodiversity opportunities.
- The landscape strategy will allow for pockets within the landscape to accommodate large tree species and their future growth. This will extend the existing townscape character into the site, where mature trees are visible forming part skyline and local landmarks.

9.13.14 The Council's Trees and Woodlands team has been consulted on the proposals and, following the submission of further detail in relation to root protection areas, the Tree Officer has raised no objections. This is subject to a condition stating

that, prior to the commencement of any development or enabling/initial works, a scheme for the protection of the retained trees, in accordance with BS 5837:2012, including an Arboricultural Impact Assessment (AIA), Tree Protection Plan(s), including details of the proposed method of protection, (TPP) and an Arboricultural Method Statement (AMS) shall be submitted to and approved in writing by the Local Planning Authority. The measures of tree protection shall be implemented on site and inspected and approved by an Officer of the Local Planning Authority prior to the commencement of any development and shall be retained in situ until written agreement for their removal is provided by the Local Planning Authority or until the adjacent phase of development is completed. A new TPO has also recently been served on the LA3 site as part of the tree officer's assessment and covers a number of groups of higher quality trees.

### *Open Space and Play Strategy*

9.13.15 The proposed Open Space and Play Strategy is set out within the Design and Access Statement. A series of public open spaces are proposed across the development as part of the landscape masterplan. There will be a hierarchy to these spaces ranging from large-scale spaces, which serve the wider community, to small-scale intimate pocket parks. A play strategy for the site has been prepared in accordance with the design guidance set out in the Fields in Trust (FiT) guidance "Planning and Design for Outdoor Sport and Play".

9.13.16 Saved Policy 76 of the Dacorum Local Plan states that at least 1.2ha of public 'leisure space' should be provided per 1,000 population, or 5% of the development area, whichever is greater. This should be "usable, well located and purposefully designed, incorporating landscaping, play equipment and other features as necessary.

9.13.17 In assessing the appropriate amount, type and location of facilities, account has been taken of the existing leisure space in the vicinity and the National Playing Field Assessment (NPFA) standards for children's play space. For the LA3 development, 5% of the development area would require 2.578ha of leisure space (i.e. 5% of 51.56ha), whilst 1,100 homes would require 3.168 ha of leisure space (assuming 1,100 homes x 2.4 person occupancy= 2,640 population).

9.13.18 The masterplan therefore provides substantially more leisure space than required by Saved Local Plan Policy 76, with a total of over 12.7 hectares of 'green space' shown in the Land Use Budget plan and this is welcomed.

9.13.19 Dedicated formal areas of play will be provided in accordance with FiT design guidance. These consist of:

- Community games area (Multi-Use Sports Area and Multi-Use Games Area);
- Neighbourhood Equipped Areas of Play (NEAP), including linear spaces for trim trails;
- Local Equipped Areas of Play (LEAPs);
- Areas of informal open space for informal play.

9.13.20 The play areas are carefully situated to provide an even spread of facilities throughout the development, giving children of all ages good access to play areas within walking distance of their homes.

9.13.21 Equipped spaces will consist of:

- One Neighbourhood Equipped Area for Play (NEAP);
- Two Local Equipped Areas for Play (LEAPs), one serving the northern part of the site and the other the south;
- One shared Community Games Area. This will be set within the school grounds and used by the school during school hours. At other times, the gates will be unlocked to provide public access whilst preventing access to the school. The area will be marked to allow games such as five-a-side football and basketball.
- Thirteen Informal Play Areas. These will predominantly be incorporated within dry attenuation basins and will include low pieces of timber equipment and stones that do not require safer surfacing, such as balance beams and stepping-stones. These will be incorporated with naturalistic planting.

9.13.22 In addition to the above, a substantial 'trim trail' will be provided in a loop around the northern half of the site. This will provide a jogging route of approximately 2.0 km, with exercise stations along its route.

9.13.23 Given the topography of the site, it was acknowledged in the process of preparing the Council's LA3 Masterplan, that it is not practicable to incorporate sports pitches within the scheme. However, the proposed amenity and play space will complement the existing sports facilities in the vicinity, such as the Hemel Hempstead Rugby Football Ground and the Dacorum play area 200m and 150m to the southeast of the site respectively. Formal sports pitches will be provided within the school Grounds. Officers are seeking the agreement of HCC for community use out of school hours through the S106 agreement.

9.13.24 The proposed open place and play strategy will ensure that high quality open space and play areas will be available throughout the development, in compliance with Saved Local Plan Policy 76.

#### *Food Growing*

9.13.25 The proposed development includes a facility for a community food-growing garden as part of the wider Green Infrastructure network. This will help to promote and provide the opportunity for the new community to grow its own food, on a small, doorstep scale. This garden space is to be located centrally adjoining other communal facilities within the community hub, including the school, and within easy reach of the care facility and local homes. It will form an integral part of a central multifunctional space, that also includes the community games area, neighbourhood equipped area for play (NEAP) and informal play space. This location will allow for easy access that also ensures good natural surveillance is maintained, whilst also providing visual interest to the street scene. The garden could contribute to the creation of a strong heart to the development, encouraging social interaction, whilst encouraging the new community to source food locally and a healthy living environment.

9.13.26 The proposals also include the opportunity for a community orchard within the new Pouchen Park area. This will be located on a south-facing slope and be an attractive area for walking, as well as providing an attractive setting for the adjacent homes. It will also provide a space for community events. This will help address the decline of formal orchards, highlighted as a priority habitat in the UK biodiversity action plan requirements. Within these spaces, new hedgerows will be introduced that will provide habitat for nesting birds and an excellent food source during the winter months. Orchards will also play a key part in creating a diverse, social and sustainable place.

9.13.27 The provision of a community orchard follows pre-application advice from Hertfordshire Ecology regarding the ecological and social benefits these can provide. The inclusion of these community food-growing facilities is welcomed.

### *Soft Landscaping*

9.13.28 Successful planting softens the built form, humanises scale, mitigates the microclimate, provides opportunities to enhance the site ecology, and provides a seasonal sense of place and a sensory dimension to new development. With this in mind, the Design and Access Statement confirms that proposed new tree planting in particular will respond to and reinforce the mature landscape structure of the development by framing key spaces and defining key routes through the planting of avenues or individual specimen street trees. A strong landscape structure will also assist in enhancing biodiversity across the site. The technical principles provided by National Joint Utilities Group (NJUG) and NHBC requirements when planting trees in the vicinity of services and buildings will be adopted for the soft landscaping.

9.13.29 On plot planting will be provided to the frontage of every dwelling and will consist of space for a combination of standard trees, ornamental shrub and herbaceous planting, ornamental hedges and/or amenity grass. This planting will ensure that attractive frontages are created to all access roads throughout the development. As stated above, this will help to soften the built environment, as well as helping to define the characteristics of different streets and areas.

9.13.30 Tree species will be chosen to complement those within the public open space, although consideration will be given to their location in proximity to houses. Within public open spaces, trees will generally be 14-16cm girth extra heavy standards, but with larger trees (18-20 cm girth) used adjacent to the primary route. Ornamental shrub and herbaceous species will provide year round interest of varying height and colour within front gardens. Larger growing shrub species will generally be set to the back of planting beds or to the middle if hard surfacing exists to both sides of the bed. Groundcover species will form the edge to most beds and under windows, such as *Bergenia*, *Euonymus* and *Hebe*. As these grow over adjacent hard surfaces, they will soften the edges. Species on the northern side of houses will be chosen to be tolerant of shade conditions. Tree species within streets and private gardens have been chosen to give the appearance of native varieties, but with the reliability of named cultivars to ensure greater success in establishment and forms more suited to semirural situations. Tree species included in the public open spaces and will mainly be 14-16cm girth extra heavy standard trees, rootballed with an overall height of 425-

600cm (see Table 53 for indicative species). Trees within the Community Hub area are likely to be 18-20cm girth.

9.13.31 Native shrubs will generally be planted at a density of one to two plants per square metre, using transplants at 60-80cm and 100-125m height in single species groups of 4-7 plants. Areas of ornamental shrub and herbaceous planting are proposed around the northern LEAP and NEAP, and within the public open space adjacent to the Community Hub to add visual interest. These will generally be planted at a density of 3- 6 plants per square metre. Adjacent to the play areas, plants with good sensory qualities (colour, texture, scent).

9.13.32 Full details of soft landscaping for both the full and outline elements of the application will be sought by condition but the proposals demonstrate a commitment to a high quality soft landscaping scheme for the development which is welcomed by officers and is deemed to be policy compliant.

#### *Hard Landscaping*

9.13.33 The Design and Access Statement also provides details of the proposed hard landscaping treatment for the development. It confirms that the public and private/communal areas will be designed to be high quality, robust and to reinforce the character areas, complementing its local context. Importance will be given to the appropriateness of the materials with regard to place making and their long-term performance with regard to life cycle costs.

9.13.34 The palette of hard landscape materials to be used across the proposed development will help in defining the various character areas. Street furniture, including seating, litterbins and bollards will be timber throughout, contributing to a rural character that befits the site's context and strong network of wildlife corridors. These features will be simple and contemporary in style.

9.13.35 Primary, secondary and tertiary streets and associated footways will be surfaced with tarmac. Shared surface streets and shared private drives may be surfaced with block paving. Metal railings or post and rail fencing will feature at adjoining green spaces.

9.13.36 As per the soft landscaping treatment, full details of hard landscaping for both the full and outline elements of the application will be sought by condition but the proposals demonstrate a commitment to a high quality hard landscaping scheme for the development which is welcomed by officers and is deemed to be policy compliant.

9.13.37 Officers are satisfied that the proposals are in broad compliance with Core Strategy policies CS10, CS12, CS25, CS26, CS27, the Site Allocations DPD and adopted LA3 Masterplan, as well as Local Plan policies 76, 79, 100 and 101.

#### 9.14 Socio-economic

9.14.1 The socio-economic impacts and benefits of the proposed development have been assessed in the Design and Access Statement, which has been submitted in support of the application. These are summarised below.

## *Social*

9.14.2 The proposed development will provide 1100 new dwellings, along with a 70-bedroom elderly care facility and a site for 7 gypsy and traveller pitches. Using a multiplier of 2.4 (average household size in the Study Area), it is estimated that this would generate a total population of about 2,640 people. The 2011 census puts the population of Hemel Hempstead at just under 95,000. This therefore represents an increase of approximately 2.8% on the current population level.

9.14.3 The scale of the population growth attributed to the proposed development is considered to be of moderate long-term significance on the town of Hemel Hempstead as a whole. However it is considered that there would be no adverse impact on the town as the provision of the new community facilities, proposed as part of the development, will be necessary, including the contribution towards local health provision, supported by the CCG, the community hub and the new primary school, supported by the Education Authority.

## *Economic*

9.14.4 The proposed development would directly support 165 full time equivalent (FTE) jobs in construction. A further 86 jobs (at least) would be supported by the construction of the primary school. Additional construction jobs would be created in connection with the development of the community hub. The jobs would include a range of occupational levels from unskilled or labouring jobs, to more senior positions across a range of professional disciplines. This would support the existing workforce and potentially allow construction firms to take on additional employees.

9.14.5 Furthermore, it is estimated that around 135 new and on-going full time equivalent (FTE) jobs would be created, excluding potential employment from the new local shopping and community facility. 22 FTE teachers and support staff would be required for a 1-form entry primary school and 45 for a 2-form entry school, which is the eventual permanent size of the proposed primary school. The children's day nursery will accommodate 75 children and employ around 20 staff. In general, a broad measure of staff requirement for a care home is one FTE job for each resident, giving 70 FTE's for the 70 beds proposed. This would vary depending on the level of care required for each of the residents and the extent of facilities and services provided.

9.14.6 It is considered that the household creation and associated increase in population would be adequately supported by the provision of social and community infrastructure. The mixed-use development proposed would also support the creation of new local jobs, which represents a significant economic benefit to the town and wider Borough.

## 9.15 Sustainability

9.15.1 The approach to sustainability for the proposed developed is summarised in the Design and Access Statement. The masterplan seeks to create a sustainable new neighbourhood through the adoption of good masterplanning principles, as discussed earlier in this report.

9.15.2 The Design and Access Statement confirms that the primary objective of the grain and block structure of the masterplan is to create a long-lasting sustainable place by:

- Designing for change by creating adaptable block sizes, to respond to changes in the needs and roles of development over time.
- Designing for passive solar design with consideration of east-west blocks where practicable to make the most from natural sunlight.
- Designing responsively to the topography and landscape features of the site.
- Designing with local ecology in mind to improve the relationship between development and nature.
- Creating choice and ease of movement for pedestrians and cyclists as part of a walkable neighbourhood approach.
- Provide ease of access to facilities and public transport with access to facilities within a 10-minute walk and majority of the development within 400m of bus stops.

9.15.3 The connected street structure for the development focuses wherever possible on longer east-west routes in order to maximise solar gain, as confirmed in the design section of this report.

9.15.4 Sustainable Drainage Systems (SuDS) are promoted across the site and form an integral part of the green infrastructure (GI) strategy, with a number of methods including swales and filtration within public open spaces, and consideration of use of permeable paving and other surfaces within both the public and private realm. Individual properties, both commercial and residential, will seek to achieve high levels of sustainability, focusing on a range of simple but effective objectives, such as water management and ensuring high levels of insulation. Housing, community and commercial buildings will be designed in conformity with the latest Building Regulations to ensure sustainable levels of construction throughout the development.

9.15.5 The development will help to encourage a modal shift towards more sustainable modes of transport. Sustainable attitudes to travel will be promoted throughout the development by locating properties within a walkable distance from services, facilities and public transport networks, and providing appropriate facilities to encourage walking and cycling as an alternative to private vehicle use. The sustainable transport merits of the proposals are discussed in more detail in the access and highways section of this report below. A range of high quality and attractive footpaths and cycle paths will form an integral part of the development, as previously discussed in the design section of this report.

9.15.6 Overall it is considered that the proposals comply with the relevant elements of Core Strategy Policies CS28 and CS29, as well as the NPPF. The proposals are considered to represent sustainable development. The proposed development at LA3



would result in a sustainable new neighbourhood when considering the social, environmental and economic strands to sustainable development.

### 9.16 Access and Highways

9.16.1 The highways and access elements of the proposals are detailed within the Transport and Access chapter of the Environmental Statement, which has been submitted in support of the application. The access strategy is also set out in the Design and Access Statement. A full Transport Assessment (TA) has also been produced which is within the appendix of the Environmental Statement, accompanied by a Framework Travel Plan. A Transport Assessment Addendum has also been produced in order to address specific Highway Authority and consultee comments emerging from the application assessment period.

9.16.2 The application seeks approval for vehicular access points to Long Chaulden, The Avenue, access to the gypsy and traveller site and foul drainage pumping station from Chaulden Lane, and an emergency access point to Chaulden Lane.

9.16.3 The TA and Environmental Statement chapters assess the suitability of the accesses to the site, as well as the highways impacts of the proposals in the immediate vicinity of the site and in the wider locality. Off-site mitigation measures required to mitigate any highways impacts resulting from the proposed development are also detailed and assessed. The highways and access elements of the proposal were subject to Environmental Impact Assessment (EIA) Scoping and detailed pre-application discussions with both the Council and the Highway Authority (Herts County Council).

### Access

#### *Access Strategy*

9.16.4 The access strategy for the development is set out in the Design and Access Statement. This contains a number of movement objectives. The strategy confirms that a key objective of the movement framework is to create a clear pattern of streets within the development and ensure the area and its surroundings are easily accessed by foot and cycle. This can only be done by balancing the movement hierarchy and avoiding a car led development in order to help create a modal shift towards more sustainable forms of movement. Movement priority will need to be focused on pedestrians who will be placed at the top of the hierarchy. Cars will be given the lowest priority on most streets. The future movement hierarchy in the development will need to respond to the requirements of the following key users in this order:

- 1 Pedestrians
- 2 Cyclists
- 3 Buses
- 4 Cars

This approach is in accordance with HCC's Local Transport Plan (LTP) 4.

9.16.5 The principle access to the site is via Long Chaulden, with a 'right turn lane T' junction, with a secondary access via The Avenue. The Long Chaulden junction will also connect to the local bus network and provide services into the site via the Primary Street. A key component of the Masterplan will be the creation of the north-south link, which forms the spine of development, and loops back onto Long Chaulden, allowing a bus service to penetrate the site. Bus stops will be provided at key locations, with the existing stops on Long Chaulden adjacent to the main site entrance being upgraded.

9.16.6 From this primary link, a network of streets will produce a well-connected environment, focused on good pedestrian movement. These will be overlooked streets and lanes, and not purely roads or footpaths between development blocks. Separate footpaths and cycle routes will be overlooked by development wherever possible, in order to provide natural surveillance, which has been designed into the Masterplan. Improved links into the countryside network of bridleways and footpaths to the north, south and west will be provided to ensure good connectivity. Development will follow the principles of traditional perimeter blocks, helping to create street elevations that are made more appealing by visible activity and creating a coherent new street pattern, responding to uses, scale and landscape design.

9.16.7 The layout of the development, together with the detailed design of streets, aims to encourage walking and cycling as the likely modes of travel over short distances. The ease of access to public transport that will be facilitated by the proposals will help to encourage public transport becoming a more attractive mode over longer distances. Public transport will therefore be given greater priority and will have strong connections to the proposed community hub. The development will be a place that does not need to rely heavily upon the car as a primary mode of transport, provides opportunities to reduce pollution and congestion, and creates a more lively and varied area.

#### *Public Transport Strategy*

9.16.8 The principles of the public transport strategy are to create a development accessible by bus and to enhance connections to the town centre and employment areas in Hemel Hempstead. Bus access will be via the proposed Long Chaulden junction and extension to the Avenue and utilise the Primary Street network, with a bus stop in the southern sector (north of Pouchen Park) and connection through the Community Hub with an additional bus stop, before exiting back onto the Long Chaulden junction. The majority of residents will be able to access the bus service (existing and proposed) within a 400m walk distance. Discussions are currently ongoing between the developers, the Highway Authority and local operators who run commercial services in the area. The final proposals will be formed as part of the overall mitigation strategy and secured via the S106 Agreement. This will include a subsidy contribution to one of local bus companies that provide the two local existing bus routes.

#### *Travel Plan*

9.16.9 A Framework Travel Plan (FTP) has been prepared and submitted in support of the planning application. This is summarised in the TA. The FTP will focus on

promoting sustainable lifestyles amongst new residents, through reducing the need for travel by private car, providing non-car mode travel options for local journeys and influencing modal choice. The FTP will also provide an initial Framework for implementation, management and review of the Travel Plan.

### *Street Types*

9.16.10 The strategy aims to create a range of streets within the development. These comprise of:

- Primary Bus Streets
- Primary Streets
- Residential Streets
- Lanes
- Courtyards

*Primary Bus Streets* - The primary streets will provide the main movement route into and through West Hemel for all forms of transport and will link into the wider local network. These will be designed as wider 6.75m carriageways to allow a bus service to operate within a loop through the development, together with safe movement corridors for pedestrians and cyclists.

*Primary Streets* - The remaining primary street will provide future proofing for further public transport services, if required to the Avenue, ultimately (through the LA3 development) for all forms of transport and will link into the wider local network. These will be designed as wider 6.75m carriageways.

*Residential Streets (Secondary)* - Secondary streets form the main access routes to blocks within the proposed development. Priority will be placed on the design for pedestrians and cyclists, as well as providing access for vehicles (except buses and commercial vehicles). Streets will be designed to provide a more formal arrangement. This will be reflected in the proposed arrangement of buildings, footpaths, on-street parking (parallel or right angle) and traffic calming.

*Lanes (shared surface and tertiary)* - Lanes will be designed according to home-zone principles. The aim is to create intimate spaces with good surveillance, where pedestrians and cyclists have priority over vehicles. The route for vehicles through the space should be wide enough to provide access for removal vans, refuse vehicles and fire tenders, with spaces to allow vehicles to pass.

*Courtyards/ private driveways* – As above, courtyards will be designed according to home-zone principles. The aim is to create intimate spaces with good surveillance, where pedestrians and cyclists have priority over vehicles. The route for vehicles through the space should be wide enough to provide access for removal vans, refuse vehicles and fire tenders, with spaces to allow vehicles to pass.

Cyclists will also have effective linkage options between all destinations via the leisure cycleway routes network within the green infrastructure corridors.

## Key Junctions and Mitigation Measures

### Long Chaulden

9.16.11 The primary access junction for the development will be via Long Chaulden. It will be designed as part of the Phase 1 detailed component of the planning application, as a Right Turn Lane 'T' junction separated by a central island to allow for pedestrian and cycle crossing points. This will help to encourage links between Shrubhill Common and routes through the development to the west and north. The road will be designed as a "raised causeway effect" above the adjoining wet attenuation ponds. Long Chaulden itself will be locally widened to allow for the central lane, to facilitate right hand turns into the site when approaching from the north.

### The Avenue

9.16.12 The connection to The Avenue to the northern boundary of the site will serve as a secondary access/egress link and allow for pedestrian, cycle and vehicular connectivity. This will provide opportunities for existing residents to access the proposed new facilities and open space. This is less of a junction and more of a connection into the site.

### Chaulden Lane Emergency Access

9.16.13 The proposed emergency access to the south onto Chaulden Lane will be restricted by a gate or collapsible bollards, to provide an emergency access to the development for emergency vehicles only.

### Gypsy & Traveller Site Access Chaulden Lane

9.16.14 As discussed earlier in the report, the proposed gypsy and traveller site is located in the south-west corner of the site, consistent with the Council's adopted LA3 Masterplan. The proposed access via Chaulden Lane, in accordance with the Council's adopted LA3 Masterplan, allows early provision of the gypsy and traveller site as required by the Development Plan. Whilst the LA3 Masterplan policy requirements make no specific reference to a separate access from Chaulden Lane to serve the traveller site, the background text confirms that this access could be supported, subject to further testing at the application stage (see para. 5.31 below):

*'The location of the site is shown indicatively in the south west corner of the land (see Plan 9) and it is assumed that access will be secured directly from Chaulden Lane, subject to final confirmation at the planning application stage regarding road capacity. The reference to 'potential location' in Plans 5 and 9 refers to the location of the gypsy and traveller pitches within the site rather than the potential for such provision at site LA3. The exact area of land will be dependent on detailed design but is likely to be in the order of 0.5ha.'*

9.16.15 The pedestrian and cycle connections to the primary school and community hub within the central part of the development allows good access from the gypsy and traveller site to the proposed community facilities in the development.

## Off-site Mitigation

9.16.16 In addition to the inherent design features of the masterplan and access points, a number of measures have been identified to mitigate the environmental effect of traffic associated with the development proposals. The full details of the proposed junction improvements are set out within the accompanying Transport Assessment and Transport Assessment Addendum. A summary of the proposed off-site mitigation measures is set out below however:

- Junction 3 Long Chaulden/ Northridge Way Mini Roundabout - The proposed junction improvement includes widening of the three entry arms as they approach the junction. This requires re-allocation of some of the street furniture such as lampposts. The existing zebra crossing in the southern arm of the junction will also be revised, so that the tactile paving provided meets current design standards.
- Junctions 4&5 Long Chaulden/ Boxted Road/ Warners End Road/ Northridge Way Mini Roundabouts (adjacent to the Top of The World PH and close to the Stonecroft Local Centre) - Proposed junction improvement measures for the above junction include two lane entries from the north and south, and two lanes in each direction between the two mini roundabouts. These measures provide greater entry capacity, as well as increased traffic storage capacity between the two mini roundabouts. To provide for pedestrians, the existing pedestrian crossings to the west will be retained and modified. The existing dropped kerb with tactile paving is retained to the north and the pedestrian refuge to the south will be enlarged to meet current minimum design requirements.
- Junction 6 Warners End Road / Leighton Buzzard Road Roundabout - The proposed junction improvement measures include a reduction to the circulatory carriageway width in compliance with Design Manual for Roads and Bridges (DRMB) design guidance. The entry width on each approach will be increased to provide greater junction capacity and dedicated lanes for each movement. The existing signalised pedestrian crossing to the south is to be retained, however the existing tactile paving to the west, north and east will be renewed and relocated to match in with the enlarged pedestrian islands.
- Junction 7 Northridge Way/ Fishery Road Roundabout - The proposed junction improvement measures for the above junction include increased entry width on all approaches. The existing pedestrian refuges on each arm of the junction would remain unaltered.
- Junction 8 Fishery Road/ A4251 London Road Roundabout (opposite Hemel Hempstead railway station) - The proposed junction improvement measures for the above junction include increasing the length of the two lane approach from the north, and an additional entry lane on the western arm. The existing pedestrian facility is to be improved with an enlarged pedestrian refuge on the northern arm. Cyclists are also provided for with a one way west to east cycle lane, taking cyclists travelling from the north to the east off carriageway and connecting in to the existing cycle route heading east towards the town centre. The roundabout geometry has been designed to compact roundabout design

standards, which provide a far safer roundabout design than a standard or non-standard layout.

9.16.17 Off-site mitigation measures are also proposed along Chaulden Lane, in the form of the creation of a number of passing places. This is to allow larger vehicles to be able to safely pass each other to mitigate any potential impact on Chaulden Lane because of the proposed gypsy and traveller site. Although the additional traffic generated by the gypsy and traveller site will be minimal (as confirmed in the Transport Assessment Addendum and agreed by the Highway Authority), the proposed passing places will allow Chaulden Lane to operate safely. The mitigation measures will allow larger vehicles/caravans to safely pass each other, whilst minimising the impact to the character of Chaulden Lane. Chaulden Lane is the only feasible route, which could be used to deliver mobile homes to the site and has been correctly identified as the most suitable route for mitigation.

9.16.18 The Highway Authority are satisfied with the proposed mitigation measures on Chaulden Lane associated with the proposed gypsy and traveller site and have raised no objections, subject to related planning conditions.

#### Highways Impacts

9.16.19 The assessment undertaken in the Transport and Access chapter confirms that construction activities would be carefully managed through the implementation of a Construction and Environmental Management Plan (CEMP). This would ensure that Heavy Good Vehicle (HGV) movements were carefully controlled along appropriate routes to and from the site focussing on the existing primary road network and subsequently the wider strategic road network. Good management practices including wheel-washing facilities, sheeting of vehicles and appropriate operational working hours would also contribute towards minimising the effect of construction traffic. These will all be controlled by planning conditions and associated informatives, with the CEMP being conditioned.

9.16.20 The assessment considers that the Site is a sustainable location from which future residents can access the wider facilities in Hemel Hempstead by foot, cycle and public transport and officers support this view. This fundamental point about locations has already been established in the adoption of the site in the Core Strategy and Site Allocations DPD. In addition, the proposed development provides a layout to encourage walking and cycling and provides shops, services and a site for a primary school to meet some of the future residents' day-to-day needs on foot. Public transport improvements are also proposed. The design work demonstrates a safe means of access to the site for cars, cyclists and pedestrians, and includes improvements to nearby junctions in order to reduce congestion and mitigate highways impacts. The main access points to the Site will be from Long Chaulden to the east and The Avenue to the northeast.

9.16.21 The assessment also confirms that, as one of the two main access points to the Site, The Avenue would see a large percentage increase in traffic compared to the existing situation. However, taking into consideration the very low existing traffic volumes currently using this route, the actual volume of traffic resulting from the proposed development is well below that which is likely to cause unacceptable effects.

9.16.22 Overall the TA and Environmental Statement chapter concludes that, with appropriate mitigation measures on the wider transport network in place, it is considered that the residual environmental effects of traffic would be negligible, with a significant beneficial reduction in driver delays.

9.16.23 The Highway Authority (the County Council) has been consulted on the application and has assessed the proposals. Their comments are set out in full in Appendix A. Following the submission of the Transport Assessment Addendum and further associated supporting information the Highway Authority has confirmed that they are satisfied with the proposals in terms of highways impact and off-site mitigation. They have recommended permitting the proposed development subject to suitable conditions, mitigation measures on the local highway network and Section 106 contributions toward schemes and measures to mitigate the impact on the local highway network.

9.16.24 It is considered that the access and highways elements of the proposals are in compliance with the NPPF, Core Strategy Policies CS8, CS9, CS10, CS11, CS12, CS13, CS28, adopted Site Allocations DPD Policies LA3 and SA3 and, in particular, the Access and Movement Strategy Principles of the Council's adopted LA3 Masterplan.

## **Other Technical Material Considerations**

### 9.17 Flood Risk and Drainage

9.17.1 Hydrology, flood risk and drainage are assessed in the Hydrology chapter of the submitted Environmental Statement, which contains detailed considerations pertaining to matters relating to flooding, surface water drainage and foul water drainage. This has been supported by the preparation of a detailed Flood Risk Assessment, Surface Water Drainage Strategy and Foul Water Drainage and Utilities Assessment. The potential hydrological impacts associated with the proposed development, during both the construction and operational phases, have been considered. These assessments and their conclusions are summarised below.

9.17.2 The site is currently in agricultural use with few existing drainage features on site. These include some field drains and an existing man-made flood alleviation dry pond, which discharges into the local surface water sewer in Long Chaulden. There are no public sewers within the site boundary.

9.17.3 There are no recorded historic incidents of flooding at the site. All potential sources of flood risk at the application site have been assessed, and the risks of flooding occurring at the application site have all been assessed as low.

9.17.4 On site testing indicates that there is a potential for groundwater drainage through the underlying sub soils. As such, infiltration drainage techniques have been considered as a main method of surface water disposal.

9.17.5 The retention of major surface water run-off will be achieved using "Sustainable Drainage Systems" (SuDS). This will incorporate open space features such as wet/dry

ponds, infiltration basins/swales and local porous paving through to the use of deep-bore and shallow soakaways at the end of the surface water treatment train or control at source via pervious pavements.

9.17.6 As set out above, surface water runoff from the proposed development will be mainly disposed of via shallow and deep-bore infiltration techniques. However, the surface water runoff from the eastern part of the proposed development will be discharged into the local sewer on Long Chaulden at a rate not exceeding the existing rate.

9.17.7 The groundwater source protection zone (total catchment) is located to the south of the development and requires protection from pollution risk. Therefore, no deep-bore soakaways will be located within the southern part of the site, and the maximum depth of deep-bore soakaways proposed for the northern part of the site will be approximately 25.0m below existing ground, thereby maintaining more than 10m of buffer. This will mitigate any risk to the groundwater sources.

9.17.8 The application of SuDS will also provide a good water quality, which is particularly important for the downstream watercourses and groundwater sources. In order to assess the risk of pollution to groundwater, a Groundwater Risk assessment has been conducted as part of the Geo-Environmental Assessment. This assessment confirmed that there is a low risk to groundwater from the proposed development at this location. In addition, the change of use from agricultural to residential will reduce the run-off and leaching of agricultural pollutants derived from manure, fertilisers, pesticides and herbicides.

9.17.9 During the construction phase, a range of mitigation measures have been recommended which should form part of a site-specific Construction and Environmental Management Plan (CEMP) within which all contractor activities will be undertaken. These measures include a temporary drainage network where necessary, to ensure adequate levels of pollution treatment prior to discharge from site.

9.17.10 There will be no significant interference to any known flood paths for the 1 in 100-year flood event (allowing for climate change) in the implementation of this development, as a result of which there will be no impact on flood risk elsewhere. In addition, the outline surface water drainage strategy will incorporate drainage techniques to reduce surface water run-off rates from the site to a rate not greater than the existing green field discharges to the local sewer in Long Chaulden, for storm return periods up to the 1 in 100-year event, allowing for the detrimental effects of climate change. Therefore, it is not considered that there will be significant cumulative impacts on flooding.

9.17.11 With regard to foul drainage, flows from part of the first phase (up to 100 dwellings) will be connected to the existing local sewer, with the rest of the site served by a new dedicated off site rising main between the Development and the existing Waste Water Treatment Work (WWTW) at Berkhamsted. This will ensure that the sewer networks continue to operate satisfactorily and that there is no increase in the risk of foul water flooding.



9.17.12 The construction and operation of the proposed development could have moderate to minor adverse impacts on the surrounding water environment (in terms of surface water runoff, water quality and foul drainage) should suitable mitigation not be incorporated. However, with the mitigation secured in the Parameter Plans and outline drainage strategies, the significance of residual impacts upon the local water environment ranges from minor adverse to negligible.

9.17.13 Both the Environment Agency and the County Council as the Lead Local Flood Authority have been consulted on the proposals. No objections have been raised with regards flood risk or drainage. The Lead Local Flood Authority raised initial concerns but these were dealt with through the submission of additional information. Recommended flood risk and drainage conditions have been included as part of this recommendation.

9.17.14 Given the above assessment it is considered that, when mitigation works detailed within the Hydrology chapter of the Environmental Statement and supporting documents are implemented, the proposal will be in accordance with NPPF paragraphs 155, 163, and 165 as well as Core Strategy Policies CS29 and CS31.

## 9.18 Ecology

9.18.1 The application is supported by an Ecological Assessment, which is set out within the Ecology chapter of the supporting Environmental Statement.

9.18.2 The chapter identifies ecological assets, which may be subject to some impact as a result of the proposed development. These assets include statutory designations of national, county and local significance as well as notable habitats and protected species present. The chapter then assesses the baseline impact of the proposals on these assets, before suggesting mitigation and enhancement measures, which relate directly to these impacts. Finally, the assessment identifies the impact of the proposal on assets once the suggested mitigation and enhancement has been implemented. These mitigation and enhancement works are set out within the proposed Landscape and Ecology Mitigation Plan, the implementation of which is secured by planning condition as part of this recommendation.

9.18.3 Overall, the assessment concludes that, subject to the implementation of mitigation and enhancement measures and the control of detailed landscape design, no significant effects are expected in terms of ecology. Some beneficial effects can be expected at the local level in terms of increased tree cover and an increased range of habitats, particularly for invertebrates. These principles can be accommodated within the landscaping strategy submitted as part of a reserved matters application. The applicants are supportive of a planning condition, which would require the provision of holes in garden fences to encourage hedgehogs and the provision of specially designed bricks and tiles to encourage birds and bats.

9.18.4 The proposed Biodiversity Strategy has been informed by the Ecological Assessment and is set out in The Design and Access Statement. This confirms that, as part of the overall Green Infrastructure and landscaping strategy, the existing hedgerows on the site will be retained as integral parts of the development structure. These will form the basis of key wildlife corridors running through the Site and

managed to enhance their biodiversity. A significant number of other open spaces that will be managed so as to maximise biodiversity will accompany these. Key elements are set out below:

- Chalk Grassland - Informal open space would incorporate significant swathes of chalk grassland, creating a chalk down land feel, with occasional scattered shrubs/ trees.
- Reptile Receptor Area - An area of open chalk grassland on the western side of the proposed Pouchen Park would be retained as a reptile receptor area. This would be managed so no more than 50% of the entire grassland would be cut in any one year and will be informally demarked with a timber knee rail, and presented as a 'nature conservation area' to justify its likely less well kept look.
- Dry Attenuation Basins (south) - Dry basins in the southern part of the Site would be managed as chalk grassland, and sown with a calcareous wildflower/ grass mix, with chalky subsoils exposed and arisings used to create chalk/ 'butterfly' banks. No additional topsoil or organics would be added. Any wetter areas would be allowed to develop into calcareous fen/ wet flush habitats.
- Dry Attenuation Basins (north) - In the northern part of the Site, where chalky substrates are not present, a similar approach would be taken, but with a wildflower mix suited to the conditions.
- SuDS features - Swales would be treated as attenuation basins, with wet wildflower seed mixes sown. The ditches in chalky areas would be allowed to develop into fen/ wet flush habitats where possible
- Wet Attenuation Basins - The two attenuation basins at the Long Chaulden entrance would be designed to include a variety of vegetation and habitats, including submerged/ emergent and marginal plant species at the edges and wet grassland/ marsh within the freeboard areas. The detailed design of the pond could also include a 'shoal' of shallower land at the eastern end and areas of deeper water to prevent invasion by reeds and bulrushes for example.
- Retained hedges/ treelines - These key wildlife corridors will include reinforcing with under planting and the provision of long grass/ wildflower margins where possible. These scalloped margins will create an 'ecotone' gradient, grading from the existing hedgerow through low shrubs, ruderals to long grassland (woodland edge/ hedge seed mix). Hedgerows will be trimmed and laid as necessary, to ensure the good long-term health of the features. Adjacent to the Chiltern Way, the hedgerow will be reduced to approximately 1.2m in height, to enhance natural surveillance and strengthen the hedgerow structure.
- Woodland Mitigation Area - An area of new woodland will be provided adjacent to the Site's western boundary, to compensate for the loss of a small area of existing woodland close to the Long Chaulden frontage. This will be larger than the area that will be lost ensuring a net gain.

9.18.5 The County Ecologist at Hertfordshire Ecology has assessed the proposals as part of the consultation process. His comments are set out at Appendix B. Whilst he is generally satisfied with the conclusions of the Ecological Assessment, he concluded that further attention needed to be paid to the Local Nature Reserve with either improved GI connections to the site or enhancements to the Local Nature Reserve itself being made. In addition, suitable offsite enhancements will be required in order to adequately address the loss of farmland birds, which will occur because of the proposed development.

9.18.6 The County Ecologist has suggested a suitable enhancement project for the Local Nature Reserve would involve the introduction of natural grazing at the site, which would help to address disturbance and site management issues. A S106 contribution will be sought to enable this enhancement project to go ahead to address the ecology concerns in respect of the Local Nature Reserve.

9.18.7 A further S106 contribution will be sought to enable the implementation of a suitable offsite mitigation project for farmland birds, which will involve significant new hedgerow planting off-site. The two projects identified have been agreed in liaison with the applicant's ecologist. It is considered that they suitably address the concerns raised by Hertfordshire Ecology. The scheme is therefore considered acceptable from an ecology point of view.

9.18.8 The proposals are considered to comply with the ecology and biodiversity objectives of the LA3 Masterplan and the Site Allocations DPD, as well as the relevant objectives set out within Section 15 of the NPPF.

## 9.19 Heritage

9.19.1 The application has been supported by a Built Heritage Statement which is included as part of the Environmental Statement. The statement confirms that the proposed development has the potential to cause a slight adverse impact to non-designated heritage assets at Former Stables and Barns to the east of Pouchen End Lane. However, it is considered that this would result in a negligible impact on the significance of this asset. There will be no impact on designated heritage assets. The design of the proposed scheme has been informed by the presence of this asset to minimise impact.

9.19.2 The Council's Conservation and Design Team has been consulted on the planning application and has assessed the proposals. His comments are set out at Appendix B. He has raised no objections on heritage grounds. He has concluded that there will be very little if any impact on the significance of the Pouchen End, a Grade II listed building located to the west of the site. There would be some impact on the wider landscape in which the building sits but this is considered to be nominal.

9.19.3 When considering the other designated heritage asset, Winkwell Conservation Area, he confirms that The major portion of the conservation area will not be impacted. There would be some slight impact from the northern area beyond the railway but we would consider this impact to be of a less than substantial and at a low level. There would be a change from a more rural area to that of an urban area beyond the immediate hedge and field.

9.19.4 When considering non-designated heritage assets, he confirms that there would be some minor impact on the setting of the stables and barns east of Pouchen End Lane. However, he agrees that this would be at a low level. There would also be some minor impact on the setting of Field End Farm. However, it would still be able to be understood within the surviving context. Therefore, it is considered that this harm is also at a low level.

9.19.5 He also confirms that there would be a nominal impact on the setting and significance of the Canal. He also concludes that there would be a limited impact on the setting of the West Coast Mainline railway. However he agrees that there has been substantial change to the asset over time and therefore he does not believe that a change to its setting would be detrimental to its significance in this instance.

9.19.6 Paragraph 196 of the Framework states that:

*'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'*

9.19.7 In this instance it is considered that the significant public benefits which will accrue from the proposed development outweigh the less than substantial harm/low level harm to the setting of Winkwell Conservation Area identified in the above assessment. It is considered that the proposed development would result in no significant adverse effects on the character, appearance or setting of the Conservation Area.

9.19.8 Paragraph. 197 of the Framework states that:

*'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'*

9.19.9 In this instance it is considered that the low-level harm identified to the setting of Field Farm would also be outweighed by the public benefits of the proposed development.

9.19.10 Regard has been had to the statutory tests of preserving or enhancing the character and appearance of Conservation Areas and the setting of Listed Buildings under S.66 and S72 of The Planning (Listed Building and Conservation Areas) Act 1990, which it is accepted, is a higher duty. It has been concluded that no significant harm would arise to the setting of the adjacent listed building and the character and appearance of the adjacent Conservation Area would be preserved.

9.19.11 Given the lack of any significant harm, and the planning balance assessment set out above, the proposals are considered to be in accordance with NPPF

paragraphs 189, 196 and 197, as well as Core Strategy Policy CS27 and Local Plan Policies 119 and 120.

## 9.20 Archaeology

9.20.1 The application has been supported by a desk-based archaeological assessment, geophysical assessment, an intrusive on site trenching investigation, and historic landscape assessment. The Archaeology and Heritage chapter of the Environmental Statement details the results of survey work (including a comprehensive intrusive archaeological site investigation) undertaken in this regard. These results have informed the application proposals.

9.20.2 The archaeological assessment concludes that while there are buried archaeological assets present within the site, these are not considered to be of more than local/county importance and therefore low to negligible sensitivity. Therefore, even with a large magnitude of change to the assets the overall effect on the level of sensitivity results in a minor overall effect to the buried archaeological resource.

9.20.3 The County Council's Historic Environment Advisor has been consulted on the planning application and has assessed the proposals. Her full comments are set out at Appendix B. She has concluded that:

*'The evaluation has identified two concentrations of archaeological remains in the northern and central parts of the site, and a lower density of undated, or post-medieval, features across the remainder of the site. These concentrations of archaeological remains represent settlement of broadly Iron Age date in the northern part of the site, and evidence of Roman settlement in the centre, close to Pouchen End Farm, in the form of a trapezoidal enclosure and related domestic and agricultural activity.*

*The site therefore has the potential to contain heritage assets of archaeological interest of later prehistoric and Roman date, in particular. I believe that the position and details of the proposed development are such that it should be regarded as likely to have an impact on significant below ground heritage assets, and I recommend, therefore, that provisions be made for a programme of archaeological works, should you be minded to grant consent.'*

9.20.4 The recommended conditions securing a programme of archaeological work have been included in the proposed planning conditions as part of this recommendation accordingly.

9.20.5 Given the lack of any significant harm, the proposals are considered to be in accordance with NPPF paragraph 189, as well as Core Strategy Policy CS27 and Local Plan Policy 118.

## 9.21 Ground Conditions/Contamination

9.21.1 The application has been supported by a Phase I and Phase II Geo-Environmental Site Assessment, which has been used to inform the proposals. This forms part of the Environmental Statement. The report concludes that the site is suitable for the proposed use in terms of levels of ground contamination and ground

conditions (geology), subject to a number of suggested considerations. These have been incorporated either into the parameter plans or are the subject of planning conditions to inform future detailed design or construction works.

9.21.2 The Council's Environmental and Community Protection Team has been consulted on the planning application. They have raised no objections to the proposals from a contaminated land point of view and are satisfied that the supporting information shows that there will be no risk to human health as a result of contamination due to the proposed development. This is subject to mitigation proposed and recommended planning conditions.

9.21.3 The proposals are considered to comply with Core Strategy Policy CS32.

## 9.22 Air Quality

9.22.1 The Environmental Statement includes an Air Quality chapter, which details the impact of air quality on the proposals on the site itself, as well as the impact of the proposal on air quality in the wider context. This has been undertaken in the context of relevant national and European standards.

9.22.2 The baseline assessment confirms that the Site is suitable to accommodate the uses proposed as all relevant levels are met.

9.22.3 The construction phase has the potential for some temporary effect owing to the generation of dust, particularly in relation to those existing dwellings located in closest proximity to the Site. However, these can be mitigated by the implementation of controls to be agreed within a Construction Method Statement. This will be conditioned.

9.22.4 In terms of air quality impacts because of traffic generation, the absolute concentrations expected in 2027 are still below the current air quality objectives and therefore cannot be said to have a significant impact on local air quality.

9.22.5 The Council's Environmental and Community Protection (ECP) team has been consulted on the application. The ECP officer is satisfied with the supporting information provided with regards air quality and raises no objections to the proposals subject to conditions.

9.22.6 Given the above the proposals are in clear accordance with Core Strategy policies CS8, CS28 and CS32, as well as Local Plan Policy 51, which relates to traffic impacts on air quality. The proposals also demonstrate accordance with NPPF paragraph 181.

## 9.23 Noise

9.23.1 The application is supported by a full noise assessment of the site. The methodology and findings are set out within the Noise and Vibration chapter of the accompanying Environmental Statement.

9.23.2 The conclusions of this assessment are that the baseline noise and vibrations levels on Site do not preclude the development of the uses proposed. The proposed development would achieve all relevant standards by routine design measures. In terms of impact on existing development, there would be some temporary minor effects close to the site during the construction phase. However, this can be mitigated through the implementation of a Construction Management Plan, which will be conditioned.

9.23.3 In terms of noise impacts from traffic associated with the development, the assessment concludes that there would be a negligible impact in all locations, except for The Avenue. For The Avenue, the noise changes due to development traffic amount to a minor/moderate impact in the short term and a negligible/minor impact in the long term. However, the overall noise level with development traffic still represents a relatively low level of noise exposure that would not adversely affect residential amenity for existing dwellings adjacent to this road.

9.23.4 The Council's Environmental and Community Protection (ECP) team has been consulted on the application. They raised initial concerns in relation to potential noise impacts on the residential amenity of future occupiers of dwellings proposed in the southern part of the sit, due to noise from the railway line. However, following the submission of further information from the applicant's noise consultant, which provided clarification on a number of the points raised by the ECP officer, he has confirmed that he has no objections on noise grounds, subject to a noise condition relating to the submission of a ventilation strategy for the outline phases of the development. He is satisfied that any noise impacts can be adequately mitigated.

9.23.5 Overall, the proposals have been assessed as not having a significant impact on any receptor, nor will be proposed development be subject to any noise impact that cannot be sufficiently mitigated against. Therefore, the proposals are in accordance with Local Plan Policy 11 and Core Strategy Policy CS32, insofar that they relate to noise. Furthermore, the proposals accord with the relevant provisions of the NPPF, specifically paragraph 180 and the more detailed guidance of the PPG.

#### 9.24 CIL

9.9 The Council's adopted Site Allocations DPD confirms that the site lies within Zone 4 of the CIL Charging Schedule, which means that there is no charge for residential development. Therefore, required contributions will be secured through a Section 106 agreement.

#### 9.25 S106 and Planning Obligations

9.25.1 The requirement for new development to provide contributions towards the provision of on-site, local and strategic infrastructure required to support the development is set by Core Strategy Policy CS35 – Infrastructure and Developer Contributions. The policy confirms that contributions will be required to support development unless existing capacity in relevant infrastructure exists and financial contributions will be used in accordance with needs set out in the Council's Infrastructure Delivery Plan.

9.25.2 The draft Heats of Terms for the S106 Agreement area set out below. Relevant clauses and triggers are currently subject to S106 negotiations to further refine and agree them.

Requirement	Trigger
<b>Affordable Housing</b>	
<ul style="list-style-type: none"> <li>• Provision of 40% affordable housing overall comprising:               <ul style="list-style-type: none"> <li>- A total of 122 units in Detailed Phase 1, including</li> <li>- 70 Older Persons Specialist Accommodation units</li> <li>- More than 40% affordable housing within Residual Phases to ensure 40% overall across development as a whole</li> </ul> </li> </ul>	<p>Occupation of each Phase:</p> <ul style="list-style-type: none"> <li>• No more than 50% of open market units to be occupied until contracts for AH disposal have been agreed</li> <li>• No more than 75% until 100% of AH has been completed and transferred</li> </ul> <p>Older Persons Specialist Accommodation:</p> <ul style="list-style-type: none"> <li>• Prior to occupation of the 150<sup>th</sup> dwelling a scheme for the provision of the Older Persons Specialist Accommodation shall be agreed</li> <li>• No more than 50% of the open market units within the relevant Phase within which the Older Persons Specialist Accommodation is to be provided to be occupied until contracts for the disposal of the accommodation have been agreed</li> <li>• No more than 75% of the open market units within the relevant Phase within which the Older Persons Specialist Accommodation is to be provided to be occupied until 100% of the accommodation have been constructed to practical completion and transferred to a RP</li> </ul>
<b>Education</b>	
<ul style="list-style-type: none"> <li>• £300,000 contribution (index linked) to meet additional capacity requirements at existing local schools prior to opening of new school</li> </ul>	Trigger to be agreed.
<ul style="list-style-type: none"> <li>• £8,900,000 (index linked) contribution towards the provision of a 2FE Primary School with nursery class</li> </ul>	Trigger to be agreed.



<ul style="list-style-type: none"> <li>Contribution of an estimated £600,000 to provide for further additional capacity to accommodate peak yield subject to a review mechanism.</li> </ul>	Trigger to be agreed.
<b>Childcare</b>	
<ul style="list-style-type: none"> <li>Provide and dispose of a 450sqm PVI Childcare Facility on site to the satisfaction of HCC</li> <li><b>OR</b></li> <li>pay the Childcare Contribution of £153,204 (indexed linked)</li> </ul>	Trigger to be agreed.
<b>Youth Service</b>	
<ul style="list-style-type: none"> <li>£51,685 (Index linked) towards youth provision</li> </ul>	Instalments on the commencement of each phase
<b>Library Provision</b>	
<ul style="list-style-type: none"> <li>£201,538 (index linked) towards library stock at Hemel Hempstead</li> </ul>	Instalments on the commencement of each phase
<b>Fire and Rescue Services</b>	
<ul style="list-style-type: none"> <li>Installation of Fire Hydrants</li> </ul>	This might be better as a condition.
<b>Ecology</b>	
<ul style="list-style-type: none"> <li>Contribution of £74,184 towards ecological enhancement on Shrub Hill Common</li> </ul>	Prior to commencement of development
<ul style="list-style-type: none"> <li>Contribution of £12,500 towards ecological enhancement for Farmland Birds.</li> </ul>	Prior to commencement of development
<b>Highways</b>	
<ul style="list-style-type: none"> <li>Contribution of £10,000 towards the consultation on and implementation of a traffic regulation order to enforce a road closure (or other) to address any impacts on Winkwell Area (if necessary)</li> </ul>	To be agreed
<ul style="list-style-type: none"> <li>Contribution of a maximum of £850,000 towards diversion and improvements of bus services through the development site (subject to review)</li> </ul>	To be agreed
<ul style="list-style-type: none"> <li>Contribution of £6,000 per travel plan for the costs associated with administration and monitoring.</li> </ul>	To be agreed
<b>Gypsy &amp; Traveller (G&amp;T) Site</b>	
<ul style="list-style-type: none"> <li>Delivery of the G&amp;T Site</li> </ul>	Prior to occupation of the 350 <sup>th</sup> Dwelling
<b>Sports Pitches</b>	
<ul style="list-style-type: none"> <li>Contribution of £28,000 towards off-site sports pitches</li> </ul>	Prior to the occupation of the 150 <sup>th</sup> dwelling
<b>Open Space and Areas of Play</b>	
<ul style="list-style-type: none"> <li>Locally equipped Area of Play to be provided</li> </ul>	To be agreed
<ul style="list-style-type: none"> <li>Ongoing maintenance of the open spaces through the provision of a management company;</li> <li><b>OR</b></li> <li>Ongoing maintenance of the open spaces through transfer to the LPA and payment of the commuted sum to be agreed</li> </ul>	To be agreed

Medical Facility	
<ul style="list-style-type: none"> <li>Financial contribution £393,555 towards the expansion of the Parkwood Drive GP Surgery</li> </ul>	In instalments on the commencement of phases
Community facility	
<ul style="list-style-type: none"> <li>To provide the community building</li> </ul>	Prior to occupation of the 50 <sup>th</sup> dwelling within the same phase
Retail Facilities	
<ul style="list-style-type: none"> <li>To provide the retail facilities to shell and core</li> </ul>	Prior to occupation of the 50 <sup>th</sup> dwelling within the same phase

## 10. Conclusions

10.1 Paragraph 7 of the NPPF makes it clear that the purpose of the planning system is to contribute to the achievement of sustainable development. Indeed, Paragraph 10 of the NPPF confirms that sustainable development is at the heart of the NPPF. As such, plan making and decision taking should be subject to a presumption in favour of sustainable development.

10.2 Paragraph 11 of the NPPF sets out what this means for decision taking. This includes:

*“Approving development proposals that accord with an up-to-date development plan without delay”.*

The proposed development relates to the implementation of an allocation within the Council’s adopted Core Strategy and Site Allocations DPD (July 2017) and is therefore in accordance with an up to date development plan document.

10.3 The proposals represent sustainable development. The proposed development at LA3 would result in a sustainable new neighbourhood when considering the social, environmental and economic strands to sustainable development. Overall, it is considered that the proposals comply with the relevant elements of Core Strategy Policies CS28 and CS29, as well as the NPPF.

10.4 The implementation of the proposed development will result in the delivery of the largest residential allocation within both the Council’s adopted Core Strategy and adopted Site Allocations DPD. It will make a vital contribution to maintaining an essential pipeline of housing supply, which is critical to the Council being able to meet the requirements of the Government’s Housing Delivery Test. The site represents an important short-medium term contribution to Dacorum’s overall housing supply in the Local Plan and, importantly, to the 5 year housing land supply position.

10.5 The Planning Application is seeking permission for up to 1,100 homes. Officers are satisfied that the proposed quantum has been robustly evidenced and justified through a suite of technical documents which support the application, in compliance with the Council’s adopted Site Allocations DPD (paragraph 6.21). It is considered that the increase in numbers will help to ensure a more effective use of the land. The increased housing numbers will not result in any additional harm whilst they would result in additional benefits. These include the provision of a greater number of affordable homes. It will also allow the development to better support the provision of

associated infrastructure to support the development, including the primary school, community hub, GP surgery expansion and off-site highways benefits. The additional housing proposed will also make a valuable contribution to the Council's 5-year housing land supply.

10.6 A range of community infrastructure will be provided as part of the proposals and these are considered to represent a significant benefit of the scheme weighing in its favour. The proposals are considered to comply with NPPF paragraphs 56, 92 and 104 as well as Core Strategy Policies CS23 and 35.

10.7 Section 12 of the NPPF places great emphasis on the role of good design in place making. It is considered that, on balance, following the improvements which have been made to the design following the urban design workshops and the submission of the Urban Design Framework, the proposals are in accordance with the provisions of the NPPF, Core Strategy Policies CS10, CS11 and CS12, the Site Allocations DPD, and, in particular, the LA3 Masterplan when it comes to urban design and design.

10.8 The Site has been assessed against all relevant policies of the Development Plan, as well as other relevant material considerations. The proposals are considered to be in accordance with the Development Plan and other relevant material considerations.

10.9 The proposals represent a suitable, sustainable and deliverable development at the Council's largest residential allocation, as set out within both the adopted Core Strategy and adopted Site Allocations DPD. It will deliver much needed market and affordable housing along with other tangible benefits, whilst resulting in no significant harm. The planning balance clearly favours development of the proposals. Therefore, in accordance with paragraph 11 of the NPPF and Section 38(6) of the Planning and Compulsory Purchase Act 2004, officers recommend that planning permission should be granted without delay, subject to the agreement of the S106 Agreement currently being negotiated.

## **11. RECOMMENDATION**

11.1 That planning permission be **DELEGATED TO THE GROUP MANAGER DEVELOPMENT MANAGEMENT WITH A VIEW TO APPROVAL**, subject to the completion of a S106 Agreement and agreement of final planning conditions. The conditions will cover the following topics and a full draft list of conditions will be reported to Members as part of the Addendum.

Time Limit  
Reserved Matters  
Phasing Plan  
Reserved Matters Phasing  
Approved Plans  
Flood Risk Assessment  
Lead Local Flood Authority  
Tree Protection  
Construction Environmental Management Plan  
Construction Traffic Management Plan

Archaeology  
Contamination  
Estate Road Management and Highway Adoption  
Highway Detailed Design  
Off-site Highways Works  
Travel Plan  
Access  
Pedestrian Works  
Electric Vehicles  
Existing Access  
Cycle Parking  
Levels  
Materials  
Hard and Soft Landscaping Scheme  
Public Realm, Landscape Management and Maintenance Scheme

## **Appendix A**

### **Consultee Responses**

#### **DBC Strategic Policy**

##### *1. General*

Unfortunately, I have not had the opportunity to read the large number of associated technical documents accompanying the application, so our comments will be provided to you on a high-level basis. We acknowledge that this is a hybrid application and thus the full details will only be available for Phase One of the proposed development (350 homes in total).

Firstly, we welcome the scheme in principle in terms of taking forward the existing allocation (LA3 West of Hemel Hempstead) bearing in mind the previous delays in bringing it to this stage. We also note that currently, a number of the other Local Allocations are also being progressed through the Development Management system (i.e. LA1, LA4 and LA5). They are all vital in maintaining a pipeline of supply. In the case of this application, the site represents an important short-medium term contribution to our overall housing supply in the Plan and, importantly, to the 5-year housing land supply position.

We are aware that the proposal has been subject to extensive pre-application discussions and public consultation which have helped inform the submitted scheme.

Our main focus will be to ensure the planning requirements and contributions set out in the Site Allocations DPD under Policy LA3

(<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-site-allocations-statement-june-2017.pdf?sfvrsn=10> ) and its associated masterplan (<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/la3-master-plan.pdf?sfvrsn=6> ) are delivered, including:

A phased and comprehensive approach to delivery.

An appropriate and high level of affordable housing (40%).

The delivery of a new primary school.

Off-site contributions towards improvements to local GP facilities (Parkwood Surgery).

High levels of linked green spaces and associated play facilities and nature conservation.

A well connected new neighbourhood.

The provision of other community/local facilities e.g. community space, shops, small commercial units, etc.

We would advise that you refer in detail to the policy and masterplan when assessing the application. The applicants appear committed to delivering these objectives (as set out in their planning statement) and we are pleased to see this.

Ultimately, our aim is to see that this policy framework supports a sustainable, distinct and high quality development that is sensitive to its local context. We also recognise that you have undertaken a significant amount of pre-application discussions with the landowner (and relevant stakeholders) leading up to and informing the submission.

## *2. Exceeding the Local Plan Housing Capacity*

Fundamentally, we raise no objection in principle to the proposed increase in the capacity of the development from 900 to 1,100 homes compared to that shown in the Plan. This is on the basis that the Site Allocations DPD allows for the capacity for the allocation to be exceeded (para 6.21/Schedule of Housing Proposals and Sites):

"The net capacity figures specified provide an estimate of expected capacity and should not be treated as a maxima. Final dwelling capacities will be tested through the planning application process, where detailed schemes will be expected to demonstrate compliance with specified requirements and other relevant policies and guidance."

Therefore, the onus is on the applicant to demonstrate that the increased scale of the proposal can be accommodated to the satisfaction of the Council in terms of design, access, highways, local infrastructure, etc. We note that the applicants have submitted a wide range of technical documents in support of this level of development including:

Transport and Access;

Air Quality;

Noise;

Drainage and Flood Risk;

Biodiversity;

Landscape and Visual Impact;

Cultural Heritage; and

Socio-Economic Effects

The increased scale of development is likely to ultimately ensure a more effective use of the land and will also be reflected in slightly higher levels of overall densities (in the range of 35-55 dwellings/ph). However, this places even more importance on design matters and in achieving a high quality of development. I acknowledge that

you are taking this forward in conjunction with the Strategic Sites delivery team who are providing you with advice and guidance on urban design matters.

### *3. Gypsy and Traveller site*

We welcome the commitment of the applicant to deliver a serviced traveller site of 7 pitches. It is important to secure a traveller site in order to meet our short-medium term identified need under the 2013 traveller need assessment (<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/hg8-travellers-needs-assessment-trdc-and-dacorum-2013.pdf?sfvrsn=0> ). In addition, the LA3 allocation is one of only two identified locations (the other being LA1 Marchmont Farm (5 pitches)) where this need can actually be met in a planned manner.

We note that the master plan makes no specific reference to a separate access from Chaulden Lane to serve the traveller site in the policy requirements. However, it is suggested that this access could be supported in the background text to the master plan, subject to further testing at the application stage (see para. 5.31):

5..28 A gypsy and traveller needs assessment was completed in January 2013 together with Three Rivers District Council. In order to meet local needs and fulfil its statutory duties, the Council require that a small Gypsy and Travellers site is made available. There is a need to provide homes for gypsies and travellers, and LA3 is an acceptable location in planning policy terms, provided that certain criteria are met.

5.29 Policy LA3 in the Site Allocations DPD requires that 7 pitches are provided and that the phasing of the site seeks to deliver the Gypsy and Traveller Pitches within an early phase, subject to technical and viability considerations, to ensure a 5 year supply of Gypsy and Traveller provision.

5.30 The site should be designed in accordance with the Department for Communities and Local Government design guidance or any replacement advice (available at):

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/11439/designinggypsiesites.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/11439/designinggypsiesites.pdf)).

5.31 The location of the site is shown indicatively in the south west corner of the land (see Plan 9) and it is assumed that access will be secured directly from Chaulden Lane, subject to final confirmation at the planning application stage regarding road capacity. The reference to 'potential location' in Plans 5 and 9 refers to the location of the gypsy and traveller pitches within the site rather than the potential for such provision at site LA3. The exact area of land will be dependent on detailed design but is likely to be in the order of 0.5ha.

The County Council (Highways) has supported the principle of Chaulden Lane providing direct access to serve the traveller site. The access would avoid associated traffic travelling through the main residential area and, in reality, it would only need to serve a low amount of traffic movement connected with the 7 pitches.

I understand that you have already received the views of the County Council's Traveller Liaison team, although these have been limited in nature given that they are no longer being directly involved in managing new traveller sites.

While the details of the traveller site are still to be finalised, we note that its indicative location in the south western quadrant of the site follows that in the Master Plan (Plans 5 and 9). We acknowledge that there has been local pressure to relocate this to a more central location, but we consider that the present location remains a reasonable one.

For information, the 2013 traveller needs assessment is being reviewed and we hope to have this finalised shortly.

#### *4. Mix of Housing/Affordable Housing*

We are pleased to see that the first phase will deliver a wide range of types (flats/houses), tenures (affordable/market) and sizes of homes (1-5 bedroom properties). This will help meet the housing needs of the community, particularly in respect of family-sized homes and affordable housing.

We note the applicants commitment to achieving the 40% level of affordable housing across the development as a whole (subject to viability), although it appears that Phase One will secure a slightly lower quantum at 35%. Our preference is to see the higher level delivered. Is the 40% level still achievable in the future across the development as a whole?

The planning statement refers to a tenure split of 50% affordable rent and 50% intermediate housing. It acknowledges that this split differs from the normal tenure sought in the Local Plan (Policy CS18) which seeks a 75:25 mix. The Strategic Housing team need to consider whether they are content with this approach to ensure this is an appropriate way of meeting housing need.

#### *5. Extra-care housing*

We are supportive of the provision of extra-care elderly housing accommodation (70 beds) generally as part of the mix of housing and also in terms of the mix of affordable housing. It appears that the Strategic Housing team is supportive of the latter. Furthermore, the proposal is of a significant scale to deliver a much wider range of housing than would normally be the case for smaller schemes.

I understand that the draft Local Needs Assessment identifies this form of housing as falling within the C3-use class based on census work.

However, you need to ensure that the provision of such housing is not at the expense of family units and a good balance of types of housing is struck.

#### *6. Access and highways*



It is important that the applicants can demonstrate that the two principal access points (Long Chaulden and The Avenue) are suitable to accommodate the likely level of traffic movements associated with the development.

We note that an emergency access and a new vehicular access to serve the gypsy and traveller site are to be secured from Chaulden Lane in accordance with Plan 9 and as suggested in the background text to the Master Plan (paras 5.15 and 5.31). We are also pleased to see that the applicants are committed to delivering a range of off-site mitigation including works to Long Chaulden and Warners End, London Road/Fishery Road junction, St Johns Road/Fishery Road junction and the Long Chaulden/Northbridge Way junction.

We are pleased to see that it is envisaged that a turning head will be located adjacent to the County Council owned land (outside of the application site) to the south east of the site. If the County Council should later decide to release their land for future development it can be accessed through the main part of the development and avoid access being taken through the existing Chaulden Vale estate.

The scheme should also provide opportunities to encourage journeys by non-car modes including bus, cycle and footpath links. The applicants state that they are seeking to deliver a network of pedestrian and cycle routes within the proposed open spaces to link with the network of existing roads surrounding the site. This is welcomed in terms of promoting sustainable methods of transport.

The views of the Local Highway Authority should be sought on all transport and movement matters.

## *7. Open Space*

We welcome the applicants commitment to providing a high level of multi-functional green spaces/leisure spaces/landscaping across the development. Such spaces will have important roles in terms of screening the scheme, drainage, ecology/creating wildlife corridors (particularly links to Shrubhill Common to the west), providing footpath and cycle links, etc.

We also note that the proposal as a whole aims to deliver a hierarchy of neighbourhood and local play spaces including:

- A neighbourhood area of play (NEAP);
- Two locally equipped areas of play (LEAP);
- A shared common games area (SCGA); and
- 13 informal play spaces.

## *8. Community Uses*

A scheme of this size will generate the need for a range of supporting community uses on and off-site. Plan policy and guidance scheme expects the proposal to deliver or contribute towards:

A primary school;

Improved doctors surgery;

A shop; and

Other community uses

In particular, we are aware that a significant amount of effort that has been involved in trying to secure delivery of the primary school and contributions towards extension of the Parkwood Drive doctors surgery (rather than an on-site satellite surgery). These are key elements of supporting non-residential development that the scheme must deliver. I understand that you have been negotiating these in conjunction with respectively the County Council and CCG/NHS.

### **Environment Agency**

Thank you for consulting us on the above application. We have no objections to the proposed development.

Advice to Applicant/Local Planning Authority

#### *Water Resources*

The south-east is a highly water stressed region, and the impacts of population growth and climate change will add to this stress, it is therefore important that any development incorporates water efficiency measures to reduce water usage. You should seek to incorporate measures so that the average water usage is 110 litres per person per day (105 litres internal use and 5 litres external use). Such measures could include low-flow taps and showers, lower capacity baths, dual-flush toilets, rain butts for watering outside areas or even more advanced water recycling systems.

#### *Groundwater and Contaminated Land*

The site is partially within Source Protection Zone 3.

We are currently operating with a significantly reduced resource in our Groundwater and Contaminated Land Team in Hertfordshire and North London Area. This has regrettably affected our ability to respond to Local Planning Authorities for some planning consultations. We are not providing specific advice on the risks to controlled

waters for this site as we need to concentrate our local resources on the highest risk proposals.

We recommend, however, that the requirements of the National Planning Policy Framework and National Planning Policy Guidance (NPPG) are still followed. This means that all risks to groundwater and surface waters from contamination need to be identified so that appropriate remedial action can be taken. This should be in addition to the risk to human health that your Environmental Health Department will be looking at.

We expect reports and Risk Assessments to be prepared in line with our Groundwater Protection guidance (previously covered by the GP3) and CLR11 (Model Procedures for the Management of Land Contamination).

In order to protect groundwater quality from further deterioration:

No infiltration-based sustainable drainage systems should be constructed on land affected by contamination, as contaminants can remobilise and cause groundwater pollution.

Piling, or any other foundation designs using penetrative methods, should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution.

Decommission of investigative boreholes to ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies, in line with paragraph 170 of the National Planning Policy Framework.

The applicant should refer to the following sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the groundwater beneath the site:

From [www.gov.uk](http://www.gov.uk):

- The Environment Agency's approach to groundwater protection (2017)
- Our Technical Guidance Pages, which includes links to CLR11 (Model Procedures for the Management of Land Contamination) and GPLC (Environment Agency's Guiding Principles for Land Contamination) in the overarching documents section
- Use MCERTS accredited methods for testing contaminated soils at the site

From the National Planning Practice Guidance:

- Land affected by contamination

British Standards when investigating potentially contaminated sites and groundwater:

- BS 5930:2015 Code of practice for site investigations;

- BS 10175:2011+A2:2017 Code of practice for investigation of potentially contaminated sites
- BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points
- BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters (A minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns and groundwater quality.)

All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person. The competent person would normally be expected to be a chartered member of an appropriate body (such as the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites.

You may wish to consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed.

#### *Deep Borehole Soakaways*

Infiltration via deep borehole soakaways are not acceptable, other than when a drainage and hydrogeological risk assessment shows this to be the only viable option and that any risks to groundwater will be adequately mitigated.

In line with position statement G9 in The Environment Agency's approach to groundwater protection (formerly GP3) we would usually only agree to the use of deep infiltration systems for surface water if you can demonstrate the following:

There are no other feasible options such as shallow infiltration systems or drainage fields / mounds that can be operated in accordance with the with the appropriate British standard; (e.g. discharge to a shallow infiltration system, surface water or sewer)

The system is no deeper than is required to obtain sufficient soakage;

Acceptable pollution control measures are in place;

Risk assessment demonstrates that no unacceptable discharge to groundwater will take place; and,

There are sufficient mitigating factors or measures to compensate for the increase risk arising from the use of deep structures.

The above should be read in conjunction with the position statement G1. Please note that we cannot issue an Environmental Permit for the direct discharge of hazardous substances into groundwater.

#### *G1 - Direct inputs into groundwater*

The Environment Agency must take all necessary measures to:

prevent the input of any hazardous substance to groundwater

limit the input of non-hazardous pollutants to groundwater so as to ensure that such inputs do not cause pollution of groundwater

The Environment Agency will only agree to the direct input of non-hazardous pollutants into groundwater if all of the following apply:

it will not result in pollution of groundwater

there are clear and overriding reasons why the discharge cannot reasonably be made indirectly

there is adequate evidence to show that the increased pollution risk from direct inputs will be mitigated

Please refer to our Groundwater Protection webpages for further information.

#### Additional Comments – (Response to Applicant's Comments)

Unfortunately because we are currently operating with a significantly reduced resource in our Groundwater and Contaminated Land Team in Hertfordshire and North London Area, this has regrettably affected our ability to respond to Local Planning Authorities for some planning consultations. We are not providing specific advice on the risks to controlled waters for this site as we need to concentrate our local resources on the highest risk proposals.

In our response we provided standard advice that we expect all applicants to take into consideration in these instances where we are unable to provide bespoke advice. If, as the Local Planning Authority, you are satisfied that the applicant has demonstrated that this advice has been followed, as it would appear in the recent response, then it would be down you as to whether you find their submission acceptable.

The applicant should also be aware that there may be a requirement for an Environmental permit for the deep borehole soakaway and should contact our national permitting team in this regard.

## **Lead Local Flood Authority (LLFA)**

Thank you for consulting us on the above application for the mixed use proposed development at west Hemel Hempstead, pursuant to Policy LA3 of the adopted site allocations development plan document (2017) to provide for up to 1100 dwellings (with up to 40% affordable housing), comprising full planning proposals 350 dwellings and outline proposals (including means of access) for 750 dwellings. The application proposing the development of up to 110 new dwellings (including affordable housing), land for up to seven pitch gypsy traveller site, together with landscaping, roads, footpaths and cycleways, ecological mitigation, sustainable drainage systems, earthworks, public open space, one neighbourhood equipped area of play, two locally equipped areas of play and a community games area. A site for a primary school and associated nursery with playing fields on site of up to 2.1ha, specialist accommodation of the elderly with up to 70 rooms (C2 or C3), a convenience store of up to 450 sqm (A1), three retail units each of which would be up to 100sqm (A1, A2, A3, A4 and A5), a community facility of up to 175sqm, a medical facility or other use of up to 100sqm (A1, C3 and D1), a childrens day nursery of up to 450sqm (D1), a shared car park. The full application details which are submitted comprise of; a new vehicular access to Long Chaulden, a new vehicular access extension from the Avenue, emergency access to Chaulden Lane, new vehicular access Chaulden Lane serving only the land for up to a seven pitch gypsy traveller site and access to a foul drainage pumping station, a foul drainage pumping station to Chaulden Lane and the associated connecting sewer, the creation of the the first phase of 350 dwellings and associated landscaping; together with associated public open space and associated landscaping, roads, footpaths and cycleways, ecological mitigation, Sustainable drainage systems, earthworks and one association local equipped area of play.

The Flood Risk Assessment carried out by C&A Consulting Engineers Ltd reference 16-021 dated May 2018, and the information submitted in support of this application does not currently provide a suitable basis for assessment to be made of the flood risk arising from the proposed development. In order for the Lead Local Flood Authority to advise the relevant local planning authority that the site will not increase flood risk to the site and elsewhere and can provide appropriate sustainable drainage techniques the following information is required as part of the flood risk assessment;

1. Explanation of the phasing arrangements and strategic drainage strategy for the site
2. Clarification of sub-catchments and confirmation of the discharge rates and volumes from each catchment/network.

### 3. Details in relation to the ditch located within the site boundary

#### *Overcoming our objection*

To address the above points, please see the below comments;

We acknowledge that the current planning application is for hybrid permission. However it is important that certain details are confirmed to ensure that the most appropriate drainage scheme can be implemented to ensure there will be no flood risk to the site and the surrounding area and to demonstrate that an appropriate site strategic scheme using the key principles of SuDS are feasible.

The development of the site will provide up to 1100 dwellings (including affordable homes). This includes a detailed application for the first 350 residential units including access. The second part of the application comprises an outline application for up to 750 units including a primary school, local centre including community facilities and a gypsy and traveller site together with vehicular and pedestrian access, public open space, car parking and landscaping.

We note that development has been divided into phases that a strategic scheme for the site has been proposed based on discharge either to ground via deep-bore soakaways/shallow infiltration basins or to the local surface water sewer under a controlled manner. The strategic SuDS features will provide attenuation for storm events up to 1 in 100 years +40% climate change.

The site has been split in to six separate networks, referred to in the FRA as Networks 1, 2, 3, 4, 5 and 6. However the Surface Water Network Overview Plan refers to 7 Networks. This should be clarified .....

Network 1 outfalls to Thames surface water sewer whereas, network 2 to 6 have infiltration basins as the final discharge points. Network 1 has a positive outfall which connects into the local surface water sewer in Long Chaulden. The existing discharge rate from the Eastern catchment area of the development to the local sewer has been calculated within the Flood Risk Assessment, where a maximum flow rate of 11.33 l/s has been used. We note that Thames Water has been contacted in relation to the above application.

It is considered that infiltration techniques at shallow depths in the southern part of the site and deep-bore soakaways in the northern part of the site are feasible on this development. Soil infiltration testing at shallow depths between 3.00m BGL and 5.50m BGL have provided rates within the range  $3.00 \times 10^{-6}$  m/s to  $7.90 \times 10^{-5}$  m/s. Soil infiltration testing in boreholes at depth between 8.00m BGL and 25.00m BGL have provided rates within the range  $8.57 \times 10^{-6}$  m/s to  $1.96 \times 10^{-5}$  m/s. Due to the location of geo-hazard zones and moderate infiltration rates within deep-bore soakaways, all the deep-bore soakaways have been designed with an overflow. Any

discharge that occurs through the overflow flows downstream, via swales and/or pipes, to attenuation basins and finally to infiltration basins.

Phase 1 (for full planning) development parcel covers the land to the north and west of main access. Surface water from the southern part of the Phase 1 area is conveyed into shallow infiltration basins located outside of Phase 1 development area. In addition, controlled discharges from the deep-bore soakaway, located immediately north of Phase 1 development boundary, are connected into the re-profiled ditch located within the Phase 1 development area. Phase 1 development parcel has been split in to three separate networks; Networks 1, 2, and 3.

However we have concerns regarding the phasing arrangements of the development and how the strategic drainage for the site will be delivered. The catchment areas should be generally in line with the phasing of the development. The site has been divided in to several catchments which drain to areas outside the proposed phasing arrangements. The timeframe for the phasing and construction of the strategic system should be clarified to ensure the masterplan infrastructure has been put in place in order to secure the feasible discharge locations for the various catchments as some of the drainage features are located outside each of the catchment boundary. Should different catchments/sites come forward prior to the construction of strategic system an alternative means of discharge will have to be identified.

We note run-off rates have been calculated for the site. However we require clarification of the discharge rates and for all the strategic attenuation features. This information is required to ensure that the most appropriate discharge rate and volumes can be secured for a contributing area, as details of future development is not yet known.

A catchment/phasing plan should separate the site into a number of catchments and clearly show the estimated potential storage volumes/outfall rates required for each catchment for storm events up to the 1 in 100 year plus 40% for climate change events and how this is to be provided.

It is proposed to utilise an existing ditch located within the site boundary as a conveyance feature and as part of the SuDS management treatment train. However we require further details regarding the function of the existing ditch.

For further advice on what we expect to be contained within the FRA to support an outline planning application, please refer to our Developers Guide and Checklist on our surface water drainage webpage

<http://www.hertfordshire.gov.uk/services/envplan/water/floods/surfacewaterdrainage/>

#### *Informative to the LPA*

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.



Please note if the LPA decides to grant planning permission we wish to be notified for our records should there be any subsequent surface water flooding that we may be required to investigate as a result of the new development.

#### Additional Comments (Following Re-consultation on Drainage Technical Note)

Thank you for consulting us on the above application for the mixed use proposed development at west Hemel Hempstead, pursuant to Policy LA3 of the adopted site allocations development plan document (2017) to provide for up to 1100 dwellings (with up to 40% affordable housing), comprising full planning proposals 350 dwellings and outline proposals (including means of access) for 750 dwellings. The application proposing the development of up to 110 new dwellings (including affordable housing), land for up to seven pitch gypsy traveller site, together with landscaping, roads, footpaths and cycle ways, ecological mitigation, sustainable drainage systems, earthworks, public open space, one neighbourhood equipped area of play, two locally equipped areas of play and a community games area. A site for a primary school and associated nursery with playing fields on site of up to 2.1ha, specialist accommodation of the elderly with up to 70 rooms (C2 or C3), a convenience store of up to 450 sqm (A1), three retail units each of which would be up to 100sqm (A1, A2, A3, A4 and A5), a community facility of up to 175sqm, a medical facility or other use of up to 100sqm (A1, C3 and D1), a children's day nursery of up to 450sqm (D1), a shared car park. The full application details which are submitted comprise of; a new vehicular access to Long Chaulden, a new vehicular access extension from the Avenue, emergency access to Chaulden Lane, new vehicular access to Chaulden Lane serving only the land for up to a seven pitch gypsy traveller site and access to a foul drainage pumping station, a foul drainage pumping station to Chaulden Lane and the associated connecting sewer, the creation of the first phase of 350 dwellings and associated landscaping; together with associated public open space and associated landscaping, roads, footpaths and cycleways, ecological mitigation, sustainable drainage systems, earthworks and one associated local equipped area of play.

Following a review of the additional information submitted by the applicant, we can confirm that we, the Lead Local Flood Authority (LLFA) have no objection in principle on flood risk grounds and can advise the Local Planning Authority (LPA) that the proposed development site can be adequately drained and can mitigate any potential existing surface water flood risk if carried out in accordance with the submitted drainage strategy.

The development of the site will provide up to 1100 dwellings (including affordable homes). This includes a detailed application for the first 350 residential units including access. The second part of the application comprises an outline application

for up to 750 units including a primary school, local centre including community facilities and a gypsy and traveller site together with vehicular and pedestrian access, public open space, car parking and landscaping.

We note that development has been divided into phases and that a strategic scheme for the site has been proposed based on discharge either to ground via deep-bore soakaways/shallow infiltration basins or to the local surface water sewer under a controlled manner. The strategic SuDS features will provide attenuation for storm events up to 1 in 100 years +40% climate change.

The site has been split in to a number of separate networks. Network 1 has a positive outfall which connects into the local surface water sewer in Long Chaulden. The existing discharge rate from the Eastern catchment area of the development to the local sewer has been calculated within the Flood Risk Assessment, where a maximum flow rate of 11.33 l/s has been used. We note that Thames Water has been contacted in relation to the above application and have raised no objections in principle to the scheme.

It is considered that infiltration techniques at shallow depths in the southern part of the site and deep-bore soakaways in the northern part of the site are feasible on this development. Soil infiltration testing at shallow depths between 3.00m BGL and 5.50m BGL have provided rates within the range  $3.00 \times 10^{-6}$  m/s to  $7.90 \times 10^{-5}$  m/s. Soil infiltration testing in boreholes at depth between 8.00m BGL and 25.00m BGL have provided rates within the range  $8.57 \times 10^{-6}$  m/s to  $1.96 \times 10^{-5}$  m/s. Due to the location of geo-hazard zones and moderate infiltration rates within deep-bore soakaways, all the deep-bore soakaways have been designed with an overflow. Any discharge that occurs through the overflow flows downstream, via swales and/or pipes, to attenuation basins and finally to infiltration basins. All other networks are to discharge via shallow/deep borehole soakaways.

The Phase 1 development parcel covers the land to the north and west of the main access. Surface water from the southern part of the Phase 1 area is conveyed into shallow infiltration basins located outside of the Phase 1 development area. In addition, controlled discharges from the deep-bore soakaway, located immediately north of Phase 1 development boundary, are connected into the re-profiled ditch located within the Phase 1 development area.

As the proposed scheme has yet to provide the final detail and in order to secure the principles of the current proposed scheme we recommend the following planning conditions to the LPA, should planning permission be granted. It should be noted

that the strategic drainage attenuation features will be constructed as part of the preliminary infrastructure works, where necessary.

### *LLFA position*

#### *Condition 1 – Implementation of Strategic System*

The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment carried out by C&A Consulting Engineers Ltd reference 16-021 dated May 2018 and Technical Note dated 23 June 2019. The surface water drainage scheme should include;

1. Implementing the appropriate drainage strategy based on infiltration and using appropriate above ground SuDS measures and in line with the Development Catchment Plan no. 16-021-148
2. Providing storage to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + 40% climate change event .The following volumes (or such storage volume agreed with the LLFA) should be provided as a minimum for each development area as stated within the FRA Micro-drainage calculations.

The mitigation measures shall be fully implemented prior to full site occupation and in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

#### *Condition 2 – Detail Design Code for Future Phases*

Before each phase of development approved by this planning permission, no development shall take place until the design of the drainage scheme has been submitted to, and approved in writing by, the local planning authority. The drainage system for each future phase/plot shall include a restriction in run-off and surface water storage on site based on the catchment approach of the strategic system as outlined and based on the submitted Flood Risk Assessment carried out by C&A Consulting Engineers Ltd reference 16-021 dated May 2018 and Technical Note dated 23 June 2019. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

The drainage design for each phase/development area shall include the following;

1. Limiting the surface water run-off generated by the 1 in 100 year + climate change critical storm so that it will not exceed the run-off from the undeveloped site and not increase the risk of flooding off-site. Where an outfall discharge control device is to be used such as a hydrobrake or twin orifice, this should be shown on the plan with the rate of discharge stated.
2. Where infiltration forms part of the proposed system such as infiltration trenches and soakaways, soakage test results and test locations in accordance with BRE digest 365 should be provided.
3. Providing storage to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + 40% climate change event and details as to how this is to be achieved.
4. Demonstrate an appropriate SuDS management and treatment train and inclusion of above ground features reducing the requirement for any underground storage.
5. Drainage design where possible should avoid locating soakaways that serve multiple properties in private curtilage.

[www.hertfordshire.gov.uk](http://www.hertfordshire.gov.uk)

6. Silt traps for protection for any residual tanked elements.
7. Calculations to demonstrate how the system operates during a 1 in 100 year critical duration storm event plus 40% for climate change including drain down times for all storage features.
8. Full detailed engineering drawings including cross and long sections, location, size, volume, depth and any inlet and outlet features. This should be supported by a clearly labelled drainage layout plan showing pipe networks. The plan should show any pipe 'node numbers' that have been referred to in network calculations and it should also show invert and cover levels of manholes.
9. Details regarding any areas of informal flooding (events those exceeding 1 in 30 year rainfall event), this should be shown on a plan with estimated extents and depths.
10. Details of final exceedance routes, including those for an event which exceeds to 1:100 + cc rainfall event.

### *Condition 3*

Upon completion of the drainage works for each phase in accordance with the timing / phasing, a management and maintenance plan for the SuDS features and drainage network must be submitted to and approved in writing by the Local Planning Authority. The scheme shall include;

1. Provision of complete set of as built drawings for site drainage.

2. Maintenance and operational activities.
3. Arrangements for adoption and any other measures to secure the operation of the scheme throughout its lifetime.

#### Reasons

1. To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site.
2. To reduce the risk of flooding to the proposed development and future occupants.

#### *Informative to the LPA/Applicant*

We note the proposals to provide residential dwellings with individual soakaways or shared soakaways. We would strongly recommend that soakaways serving multiple properties should not be located within private curtilage. There is a high uncertainty that individual house owners will have the means to undertake the maintenance required by drainage features within their property. As the drainage system is serving more than one property, the lack of maintenance would affect several properties.

As this is a greenfield site, we would not expect the use of below ground attenuation features. At detail design stage we would expect above ground measures such as permeable paving, swales etc. could be used on impermeable sites and utilised within green space and areas of landscaping. Prioritising above ground methods and providing source control measures can ensure that surface water run-off can be treated in a sustainable manner and reduce the requirement for maintenance of underground features.

#### Comments Following Re-consultation

Thank you for consulting is with amended and/or additional plans/information in relation to the above application for the mixed use proposed development at west Hemel Hempstead, pursuant to Policy LA3 of the adopted site allocations development plan document (2017) to provide for up to 1100 dwellings (with up to 40% affordable housing), comprising full planning proposals 350 dwellings and outline proposals (including means of access) for 750 dwellings. The application proposing the development of up to 110 new dwellings (including affordable housing), land for up to seven pitch gypsy traveller site, together with landscaping, roads, footpaths and cycle ways, ecological mitigation, sustainable drainage systems, earthworks, public open space, one neighbourhood equipped area of play, two locally equipped areas of play and a community games area. A site for a primary school and associated nursery with playing fields on site of up to 2.1ha, specialist

accommodation of the elderly with up to 70 rooms (C2 or C£), a convenience store of up to 450 sqm (A1), three retail units each of which would be up to 100sqm (A1, A2, A3, A4 and A5), a community facility of up to 175sqm, a medical facility or other use of up to 100sqm (A1, C3 and D!) a children's day nursery of up to 450sqm (D1), a shared car park. The full application details which are submitted comprise of; a new vehicular access to Long Chaulden, a new vehicular access extension from the Avenue, emergency access to Chaulden Lane, a new vehicular access to Chaulden Lane serving only the land for up to seven pitch gypsy traveller site and access to a foul drainage pumping station, a foul drainage pumping station to Chaulden Lane and the associated connecting sewer, the creation of the first phase of 350 dwellings and associated landscaping; together with associated public open space and associated landscaping, roads, footpath and cycleways, ecological mitigation, sustainable drainage systems, earthworks and one associated local equipped area of play.

As the additional information does not relate to floor risk or surface water drainage, we would have no comment.

We would advise the LPA that all our previous comments in the letter dated 24 July 2019 are still valid and we would recommend that all suggested conditions detailed in that letter be included by the LPA should planning permission be granted.

#### *Informative to the LPA/Applicant*

We note the proposals to provide residential dwellings with individual soakaways or shared soakaways. We would strongly recommend that soakaways serving multiple properties should not be located within private curtilage. There is a high uncertainty that individual home owners will have the means to undertake the maintenance required by drainage features within their property. As the drainage system is serving more than one property, the lack of maintenance would affect several properties.

As this is a greenfield site, we would not expect the use of below ground attenuation features. At detail design stage, we would expect above ground measures such as permeable paving, swales etc. could be used on impermeable sites and utilised within green space and areas of landscaping. Prioritising above ground methods and providing source control measures can ensure that surface water run-off can be treated in a sustainable manner and reduce the requirement for maintenance of underground features.

### **Hertfordshire Ecology**

'The development is recognised as requiring the following:

Landscape and Ecological Management Plan (LEMP)\*

Construction Environmental Management Plan (CEMP)\*

Tree Protection Measures\*

Establishing Key Habitat Corridors (new planting, seeding and management of hedgerow and adjacent habitats) [covered by acceptable LEMP\*]

Habitat Creation (o Two ponds at Long Chaulden Gateway. o Community Orchard. o Wildflower grassland within SuDS basins and swales o Woodland and scattered tree planting) [covered by acceptable LEMP\*].

Reptile Mitigation\*

Safeguards for protected species\*\*

Sensitive External Lighting Design\*

I support these; they would be expected anyway for a development of this size and nature as they will determine the nature of any planned biodiversity within this site and potentially elsewhere. Requirements marked \* should be secured by Condition, \*\* by an Informative.

The ES Summary in respect to Ecology indicates there are no significant adverse effects for any biodiversity associated with his development. On the contrary, there are net gains. Connectivity is recognised as the most important issue; I agree it is certainly one of them.

However, for the reasons outlined in these comments, I do not accept this is a wholly reasonable assessment, although for some habitats and species it is. The development does seek to meet national and local policies and goes some way to achieving this, but clearly they are not met in some cases. Corridors are strengthened in some respects and degraded in others. If no other site of significance was present, I consider the approach to be generally reasonable for most biodiversity.

However, in my view, the development fails to recognise sufficiently the presence of the LNR – an issue raised at the outset of this development location proposal and for which there is clearly no extension, one of the DBC policy expectations.

I consider the principle issues for development at this location are as follows:

Increased isolation of the LNR

Increased indirect impact on the LNR

The metric does not consider impacts on the LNR

Multi-use corridors will compromise their ecological functionality

Net Gain of 0.22 units is substantially short of the Government's suggested 10% gain, which would be 16.7 units

39% of the habitat creation score is of gardens, an exaggerated and unreliable biodiversity benefit

Inaccuracies believed to be within the metric have generated an inaccurate score which favours net gain and should be revised if so.

In respect of hedgerows, the metric does not consider

- sufficient hedgerow loss,
- fragmentation (loss of continuity)
- disturbance

and assumes the equivalent of every length of existing hedgerows will be substantially enhanced – for which there are very limited details

#### *Loss of local farmland bird communities*

The development represents an urban extension to Hemel Hempstead, providing a new urban edge environment and essentially encapsulating an existing LNR. The rural character of features on the edge cannot be minimised as claimed if they are to be adjacent to large areas of new development – there is little if any attempt to zone development density towards the edges.

However these impacts are inevitable if a development in this area, of this size and intensity is to be pursued. Hertfordshire Ecology does not object in respect of the principle of development at this site – which has long been proposed. However the nature of the development is critical as well as the context of the LNR and in this respect I acknowledge permeability is clearly recognised as a fundamental issue.

I acknowledge the proposals ensure existing features are largely retained and enhanced where possible. Although they will be fragmented and subject to significantly increased disturbance which will limit their ecological function, I consider this has been reasonably achieved within the site itself.

However the net result fails to adequately address the presence of the LNR, the fundamental issue which has been raised for many years. This could be improved by an increase in GI connections to the site – as previous outline plans have shown – or enhancements to the LNR itself which may address disturbance or site management issues –such as introduction of grazing. The proposals are also currently insufficient to address the loss of local farmland birds, for which suitable offsite enhancements will be required locally. These issues can be discussed further if necessary.'

#### Comments Following Re-consultation



### *LA3 West Hemel - Section 106 Matters - Ecology: Farmland Birds*

In respect of the proposals and contribution towards farmland bird conservation, I can confirm I am satisfied that this proposal and amount seem reasonable, developed as it has been based on recognised establishment costs and maintenance. This is based on the principle that provision of a new hedgerow feature within a suitable location locally will benefit / enhance a local farmland bird community. In this respect it provides a measure of compensation for an aspect of ecology which cannot be replicated within the proposed development area.

As for a suitable trigger, the impacts of the development would be initiated as soon as the development was started, whether or not it was completed within one phase, as there will be a change in the nature of the development site which would impact on its ecology. Furthermore, if grazing can be established on Shrub Hill Common, this would best be established sooner rather than later as this will ensure that the management will hopefully be in place prior to the completion and use of any of the development, such that this management will be present prior to the anticipated additional use of the site. As such, would a suitable trigger for exchange of monies be prior to the first occupation of the development? Or it could be occupation of a set number of properties? This may be more difficult to monitor and prevent any use of money prior to this which could enable such management to be established. It's not a question I have been asked before but I suspect will increasingly become a requirement of the net gain agreements.

### **Hertfordshire Constabulary Designing Out Crime Officer**

In relation to crime prevention & security I would like this site to be built to the physical security of Secured by Design, ideally if the application is granted it would be preferable to meet with the architects.

#### *Physical Security (SBD)*

##### Layout /Boundary

boundary treatment , surveillance , no enclosed alleyways.

##### Communal door sets:

Certificated to BS PAS 24: 2016, or LPS.1175

##### Access Control to block of flats:

Audio Visual access control system . Tradespersons release buttons are not permitted.

Postal delivery for communal dwellings (flats):

Communal postal boxes within the communal entrances , ( Preferably covered by the CCTV) or each flat will have post delivered to it via a letter plate fitted in each flat's door., with the local Post Office being given an access fob.

Individual front entrance doors of flats/Houses

Certificated to BS PAS 24:2016

Windows: Flats /Houses

Ground floor windows and those easily accessible certificated to BS Pas 24:2016 or LPS 1175 including French doors for balconies

Dwelling security lighting (flats):

Communal entrance hall, lobby, landings, corridors and stairwells, and all entrance/exit points.

Bin stores and Waste collection:

The access doors to these should be to LPS.1175(min SR2), or BS PAS 24: 2016.

Car Parking

No bollard lighting , ( it is not fit for purpose , gets easily damaged and raises the fear of crime).

Compartmentalisation of Developments incorporating multiple flats.

Larger developments can suffer adversely from anti-social behaviour due to unrestricted access to all floors to curtail this either of the following is advised :

Controlled lift access, Fire egress stairwells should also be controlled on each floor , from the stairwell into the communal corridors.

Dedicated door sets on each landing preventing unauthorised access to the corridor from the stairwell and lift Secured by Design recommends no more than 25 flats should be accessed via either of the access control methods above.

### **Cadent Gas**

Should you be minded to approve this application please can the following notes be included an informative note for the Applicant

**\*\*PLEASE NOTE - the below information is related to Low and Medium Pressure Assets. You may be contacted separately by our engineers regarding High/Intermediate Pressure Pipelines.\*\***

Considerations in relation to gas pipeline/s identified on site:

Cadent have identified operational gas apparatus within the application site boundary. This may include a legal interest (easements or wayleaves) in the land which restricts activity in proximity to Cadent assets in private land. The Applicant must ensure that proposed works do not infringe on Cadent's legal rights and any details of such restrictions should be obtained from the landowner in the first instance.

If buildings or structures are proposed directly above the gas apparatus then development should only take place following a diversion of this apparatus. The Applicant should contact Cadent's Plant Protection Team at the earliest opportunity to discuss proposed diversions of apparatus to avoid any unnecessary delays.

If any construction traffic is likely to cross a Cadent pipeline then the Applicant must contact Cadent's Plant Protection Team to see if any protection measures are required.

All developers are required to contact Cadent's Plant Protection Team for approval before carrying out any works on site and ensuring requirements are adhered to.

### **NATS**

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

### **Network Rail**

(1) There is a bridge at Winkwell Rd / Pouchen Lane End which may be impacted by the proposal.

There is a concern that there could be an increase in bridge strikes as a consequence of construction traffic (including HGVs, high sided vehicles) and vehicles from the development.

The council and applicant are advised to discuss this issue with Network Rail. As Network Rail is funded by public remit any mitigation measures must be fully funded by the developer.

(2)

The LPA and the developer (along with their chosen acoustic contractor) are recommended to engage in discussions to determine the most appropriate measures to mitigate noise and vibration from the existing operational railway to ensure that there will be no future issues for residents once they take up occupation of the dwellings.

Network Rail is aware that residents of dwellings adjacent to or in close proximity to, or near to the existing operational railway have in the past discovered issues upon occupation of dwellings with noise and vibration. It is therefore a matter for the developer and the LPA via mitigation measures and conditions to ensure that any

existing noise and vibration, and the potential for any future noise and vibration are mitigated appropriately prior to construction.

The NPPF states, "182. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use), in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."

To note are:

- The current level of railway usage may be subject to change at any time without prior notification including increased frequency of trains, night time train running, heavy freight trains, trains run at weekends /bank holidays.
- Maintenance works to trains could be undertaken at night and may mean leaving the trains' motors running which can lead to increased levels of noise and vibration.
- Network Rail carry out works at night on the operational railway when normal rail traffic is suspended and these works can be noisy and cause vibration.
- Network Rail may need to conduct emergency works on the existing operational railway line which may not be notified to residents in advance due to their safety critical nature, and may occur at any time of the day or night, during bank holidays and at weekends.  
Works to the existing operational railway may include the presence of plant and machinery as well as vehicles and personnel for works.
- The proposal should not prevent Network Rail from its statutory undertaking. Network Rail is a track authority. It may authorise the use of the track by train operating companies or independent railway operators, and may be compelled to give such authorisation. Its ability to respond to any enquiries regarding intended future use is therefore limited.
- The scope and duration of any Noise and Vibration Assessments may only reflect the levels of railway usage at the time of the survey.
- Any assessments required as part of CDM (Construction Design Management) or local planning authority planning applications validations process are between the developer and their appointed contractor.
- Network Rail cannot advise third parties on specific noise and vibration mitigation measures. Such measures will need to be agreed between the developer, their approved acoustic contractor and the local planning authority.
- Design and layout of proposals should take into consideration and mitigate against existing usage of the operational railway and any future increase in usage of the said existing operational railway.

(3)

The applicant must ensure that the proposal drainage does not increase Network Rail's liability, or cause flooding pollution or soil slippage, vegetation or boundary issues on railway land. Therefore, the proposal drainage on site will ensure that:

- All surface waters and foul waters drain away from the direction of the railway boundary.
- Any soakaways for the proposal must be placed at least 30m from the railway boundary.
- Any drainage proposals for less than 30m from the railway boundary must ensure that surface and foul waters are carried from site in closed sealed pipe systems.
- Suitable drainage or other works must be provided and maintained by the developer to prevent surface water flows or run-off onto Network Rail's property.
- Proper provision must be made to accept and continue drainage discharging from Network Rail's property.
- Drainage works must not impact upon culverts on developers land including culverts/brooks etc that drain under the railway.
- The developer must ensure that there is no surface or sub-surface flow of water towards the operational railway.
- Rainwater goods must not discharge in the direction of the railway or onto or over the railway boundary.

(4)

As the proposal includes works which may impact the existing operational railway and in order to facilitate the above, a BAPA (Basic Asset Protection Agreement) will need to be agreed between the developer and Network Rail. The developer will be liable for all costs incurred by Network Rail in facilitating this proposal, including any railway site safety costs, possession costs, asset protection costs / presence, site visits, review and agreement of proposal documents and any buried services searches. The BAPA will be in addition to any planning consent.

The applicant / developer should liaise directly with Asset Protection to set up the BAPA (form attached).

### **DBC Pollution and Environmental Protection Team**

Thanks for contacting the Pollution and Environmental Protection Team in respect of the above hybrid planning application 4/03266/18/MFA for a mixed use development to provide up to 1100 dwellings and others.

Please be advise that we have no objection to the proposed development in relation to Land Contamination.

However, having given adequate consideration to the submitted planning statement, design and access statement and Phase I and II Geo - Environmental Site Assessment with reference 1C0101380P2R1 prepared by REC Ltd dated October 2016, the following planning condition and informative are recommend should planning permission be granted.

*1a). Contaminated Land Condition*

Having considered sections 9 (Tier 1 Qualitative Contaminated Land Risk Assessment) and 11 (Conclusions and Recommendations) of the submitted Phase I and II Geo - Environmental Site Assessment,

All remediation or protection measures identified in the submitted report especially in respect of any cut and fill activities with validation report as alluded in section 11 of the report shall be fully implemented within the timescales and by the deadlines as set out in the submitted report and a Site Completion Report shall be submitted to and approved in writing by the local planning authority prior to the first occupation of any part of the development hereby permitted.

For the purposes of this condition: a Site Completion Report shall record all the investigation and remedial or protection actions carried out. It shall detail all conclusions and actions taken at each stage of the works including validation work. It shall contain quality assurance and validation results providing evidence that the site has been remediated to a standard suitable for the approved use.

Reason: To ensure that the issue of contamination is adequately addressed and to ensure a satisfactory development, in accordance with Core Strategy (2013) Policy CS32 and the NPPF (2012).

*2). Un-expected Contaminated Land Informative*

In the event that contamination is found at any time when carrying out the approved development that was not previously identified, it must be reported in writing immediately to the Local Planning Authority with all works temporarily suspended because, the safe development and secure occupancy of the site lies with the developer.

## **DBC Environmental and Community Protection**

I refer to the above application. Please be advised that we have concerns in relation to Noise and air quality.

Referring to materials provided on the DBC planning pages the EIA appendices are not provided which detail how air quality impact was initially assessed. Therefore we cannot determine if the impact assessment near the development site is reasonable. I note there is a further statement and update from Savills, but the assessment of air quality impact is not provided. National planning policy identifies that policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones.

This development will also need to consider the significance on existing AQMAs. Recent air quality monitoring data shows ambient nitrogen dioxide levels remain above national objectives, and quite substantially in some locations. The suitability of development should not be considered until a suitable exposure and impact assessment of air quality is provided. Opportunities to improve air quality should be included within the assessment, having regard for cumulative impact. Until such time as we receive a more detailed air quality assessment we cannot support the proposal however.

The noise impact assessment has considered exposure from nearby transport sources, that being road and rail. This identifies that part of the site will be impacted by noise, but that this can be addressed by way of noise mitigation treatment to housing. However the proposed method of control is not considered wholly suitable. This proposes use of passive acoustic ventilators as alternative ventilation to openable windows. This does not overcome need for opening windows to maintain thermal comfort and other occasions when a higher number of air changes are necessary. The assessment is a bit blunt in that it does not fully consider the PPG on noise and how noise may be managed, such as the use of greater separation distances, orientation and layout and use of engineering methods, e.g. barriers / bunds.

The assessment of noise impact has also not taken into account existing commercial occupiers to the North of the application site. Located between Fields End Lane and Pouchen End Lane are commercial operations identified as Main ingredient and Sunlight Soft Drinks. The latter may have a manufacturing operation which has not been included in the EIA. Residential development that does not consider local sources of noise could result in an unacceptable amenity for future occupiers as well



risking the ability of existing commercial operators to develop in continuance of their business, and could risk its potential demise. Further work is needed to confirm the contribution to the local noise environment.

In terms of noise impact on future occupiers from transport sources this should be capable of being dealt with by way of condition for a noise mitigation scheme. Given the size and scale of development and number of years to implement we would also advise a construction management plan condition to manage noise and dust during all phases of site implementation, i.e. engineering and construction phases.

### **DBC Strategic Housing**

Having reviewed with the planning case office and following further internal meetings, we still have concerns over the proposed tenure split and mix of affordable housing units for LA3.

To provide clarification on the proposed tenure split, early applicant discussions proposed a 50% split between Affordable Rent and Shared Ownership, however no justification has been provided nor ever agreed. This was merely suggested as a negotiable starting point. We therefore stand by our policy requirement of 75% Affordable Rent and 25% Shared Ownership and firmly believe this is deliverable for the scheme. We would therefore wish to understand why the revised tenure split has been proposed?

Regarding the unit mix for Affordable Housing, the council's current demand focuses heavily on 1 and 2 bedroom accommodation (report attached). The combined accommodation schedule for Phase 1 suggests a total of 52 x 3 bed units and 9 x 4 bed units. This is deemed unsuitable when reflecting the housing need and we would like to address this issue. This was again highlighted within early pre-app discussions but never addressed. Having now further reviewed, we would be willing to reduce the 3 bed units to incorporate more 2 bed accommodation; whether this could be the 12 x 2 bed flats or 13 x 2 bed houses provided by Barrett, or the 8 x 2 bed houses provided by Taylor Wimpey (accommodation schedules attached).

We would be willing to meet to resolve these outstanding issues.

### **DBC Trees and Woodlands**

LA3

I have reviewed a number of submitted documents for the LA3 'Land at West Hemel Hempstead' site.

*Planning Statement - December 2018*

Development has been designed to provide a 'green grid' (p15) of open space and corridors, and to reinforce existing field boundaries with structural planting. It is agreed that the retention of good quality mature site trees, mostly located along hedgerows, is necessary to mitigate the loss of lesser quality but more numerous younger trees.

It was agreed by DBC, the developer and site agent at an early development meeting that significant site Oaks worthy of protection could be formally preserved through the serving of a Tree Preservation Order. This order is presently being progressed, and will ensure the retention of the historic landscape features of the old field network. It has been necessary to include some larger trees of other species on the TPO due to their proximity to prominent Oaks.

It is agreed that tree planting should be carried out to 'soften views' of the development (p17) and that native species should be used within planting schemes.

A commitment is made (p31) to create a new woodland in the western section of the development to mitigate the loss of woodland by Long Chaulden, where trees will be lost. The new woodland will limit views of development towards Pouchen End.

*Design & Access Statement - June 2018*

It is proposed to create an 'extensive network of green spaces' across the site, which are 'permeable for wildlife' (p68). The network will be framed by the existing hedgerows and trees and their retention is crucial to the presence of wildlife.

Native species are to be used in the main for new tree planting, this being important for planned wildlife corridors. No Oak or Ash are proposed (p73), which follows current national guidance regarding tree pests and diseases. However, Oak is proposed later in the document (p90).

Whilst the LA3 site does contain many Oaks, it is not possible to import them from the majority of Europe due to the presence of a pest that can cause public health issues. For this reason, the use of all Oak within landscape schemes in Dacorum has temporarily been banned.

The use of large fastigiated trees on principle development roads, with smaller species on secondary and tertiary roads, will provide aesthetic interest throughout the site.

For street or garden planting, a wider range of tree species is to be used, giving both aesthetic variety to the development but also a bio-diverse stock that will be of value for wildlife and to overcome potential issues caused by climate or pests and disease.

### *Illustrative Green Infrastructure GI002 Rev G*

The plan shows a good network of trees and open space within the development. Existing trees are supplemented with new planting. The mix of new and older trees will create visual interest throughout the development and help to provide screening where required.

The retention of older trees will also maintain a link to the previous land use of the site.

In addition to this historic value, the retention of the good quality hedgerow / boundary trees will assist in the maintenance of the link between the site and surrounding land for wildlife.

The relationship between trees and buildings will require further assessment, at a road by road level, to ensure that new planting does not present future issues to residents and buildings.

The choice of tree species proposed will also need to be assessed at a detailed level, together with specifications for trees, planting operations and maintenance.

Unless I've missed the relevant documents, a fully compliant BS5837:2012 set of reports and plans is required to be submitted for a development of this size. Given the recognised importance of site trees, the installation of agreed tree protection measures should be carried out as soon as is possible, and prior to any excavation or grading work.

### **HCC Historic Environment Advisor**

Please note that the following advice is based on the policies contained in the National Planning Policy Framework.

The proposed development site covers a large site to the west of Hemel Hempstead, and comprises approximately 51.6 ha., much of which is currently in agricultural use.

In accordance with advice previously provided by this office with regard to 4/01623/16/SCO, a programme of archaeological desk-based assessment, followed by non-intrusive and intrusive archaeological evaluation of the site, has been carried

out in order to evaluate the known and potential archaeological and historic resource within it. Such assessment is intended to identify and evaluate the nature and likelihood of the impacts of the development, in both the short and the long term, on archaeological and cultural heritage features against closely defined criteria. The reports resulting from this assessment are included in the Environmental Statement that accompanies this application.

As previously notified, a geophysical survey of the site in 2013 identified a limited number of anomalies of potential archaeological origin (potentially negative features such as pits and ditches of uncertain date) within the site. The results of this survey were tested by a programme of archaeological evaluation via trial trenching carried out in September-October 2016 (as recommended in our advice concerning 4/01623/16/SCO).

The evaluation has identified two concentrations of archaeological remains in the northern and central parts of the site, and a lower density of undated, or post-medieval, features across the remainder of the site. These concentrations of archaeological remains represent settlement of broadly Iron Age date in the northern part of the site, and evidence of Roman settlement in the centre, close to Pouchen End Farm, in the form of a trapezoidal enclosure and related domestic and agricultural activity.

The site therefore has the potential to contain heritage assets of archaeological interest of later prehistoric and Roman date, in particular.

I believe that the position and details of the proposed development are such that it should be regarded as likely to have an impact on significant below ground heritage assets, and I recommend, therefore, that provisions be made for a programme of archaeological works, should you be minded to grant consent:

1. The archaeological open area excavation of the parts of the site known to contain evidence of Iron Age and Roman settlement, prior to the commencement of the development;
2. the full investigation and recording of any archaeological remains encountered during this process, with a contingency for the preservation of any remains in situ, if warranted and if feasible,
3. the analysis of the results of the archaeological work with provisions for the subsequent production of a report and an archive, and the publication

of these results, as appropriate,

4. such other provisions as may be necessary to protect the archaeological interest of the site.

I believe that these recommendations are both reasonable and necessary to provide properly for the likely archaeological implications of this development proposal. I further believe that these recommendations closely follow para. 199, etc. of the National Planning Policy Framework, and the relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015).

In this case two appropriately worded conditions on any planning consent would be sufficient to provide for the level of investigation that this proposal warrants. I suggest the following wording:

*Condition A*

No demolition/development shall take place/commence until a Written Scheme of Investigation has been submitted to and approved by the local planning authority in writing. The scheme shall include assessment of significance and research questions; and:

1. The programme and methodology of site investigation and recording
2. The programme and methodology of site investigation and recording as suggested by the evaluation
3. The programme for post investigation assessment
4. Provision to be made for analysis of the site investigation and recording
5. Provision to be made for publication and dissemination of the analysis and records of the site investigation
6. Provision to be made for archive deposition of the analysis and records of the site investigation
7. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

*Condition B*

i) Any demolition/development shall take place in accordance with the Written Scheme of Investigation approved under Condition A.

ii) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition (A) and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.

If planning consent is granted, then this office will be able to provide detailed advice concerning the requirements for the investigation and to provide information on accredited archaeological contractors who may be able to carry out the work.

I hope that you will be able to accommodate the above recommendations.

#### Comments Following Re-consultation

Thank you for re-consulting us on the above application.

Our advice to the Planning Authority concerning this proposal remains unchanged from that provided in our correspondence dated 21<sup>st</sup> February 2019.

That is, the development is such that it should be regarded as likely to have an impact on heritage assets of archaeological interest, and provision should be made to mitigate the impact of the development on any such archaeological remains present via the placing of two appropriately worded conditions on planning consent, should it be granted.

I therefore have no additional comment to make upon the amended application.

#### **Chilterns Conservation Board**

Comments: Dacorum BC reference 4/03266/18/MFA |

CCB Comment 15th February 2019

Thank you for consulting the Chilterns Conservation Board. The application site falls outside the AONB and is an allocation within the Council's site allocations development plan document (DPD) (2017). CCB's comments are made with respect of this background and in light of our statutory purpose, as set out at section 87 of the Countryside and Rights of Way Act 2000.

The allocation at LA3 in the site allocations DPD is elaborated in the accompanying master-plan document. The site falls within the wider setting of the AONB, which lies

to the west of the site and is within the same landscape character areas (see below). Considerations of setting means that weight must be given to the AONB Management Plan policy L7 and the CCB Position Statement on setting. The AONB Management Plan 2014-2019 at policy L7 states that 'the quality of the setting of the AONB should be conserved by ensuring the impact of adjacent development is sympathetic to the character of the Chilterns'. The AONB Position Statement on setting (2011) makes the point at paragraph 14 that 'The setting of the Chilterns AONB does not have a geographical border. The location, scale, materials or design of a proposed development or land management activity will determine whether it affects the natural beauty and special qualities of the AONB'. Paragraph 14 includes examples such as 'Blocking or interference of views of the AONB from public viewpoints or rights of way outside the AONB' and 'Loss of tranquillity through the introduction of lighting, noise, or traffic movement' and 'Introduction of significant or abrupt changes to landscape character particularly where they are originally of a similar character to the AONB'.

The masterplan in both its vision and in some of the design principles promotes Chilterns design principles to create a high quality and attractive design ethos. This is a commendable planning objective and an important one to deliver in the stated vision for LA3. In light of the hybrid status of the application CCB would therefore recommend that:

(1) These design principles are delivered through a design code that itself takes cues on layout / orientation, materials and form from the published Chilterns Buildings Design Guide and the Supplementary Technical Notes on materials. The guide contains a series of checklists that can inform such principles, for example 1.14 The Objectives of this Design Guide are to: Raise awareness of the quality of the traditional built character of the Chilterns AONB Help identify and protect the distinctive traditional built character of the Chilterns AONB and thereby promote local identity Inspire high quality design in new developments which respect the traditional built character of the AONB Re-establish traditional character in areas of the AONB where it has been damaged or eroded Provide a co-ordinated and integrated approach for design advice throughout the AONB Ensure that appropriate development respects its local context and the wider landscape Promote sustainability in design and use of resources, particularly locally produced building materials.

We commend this approach and also would draw attention to the holistic nature of the Chilterns Design Guide, where it deals with the overall form and layout of development for example, 'valley bottom and scarpfoot villages - nucleated form' (page 18). Adopting a similar landscape scale or settlement scale approach to the design coding principles would assist in development of an integrated design vision.

(2) That the use of landscaping, green infrastructure and accessible natural greenspace is also informed by the Herts Landscape Assessment study. The AONB and the edge of the site both fall within area 118 'Lower Bulbourne Valley' and the 'Little Heath Uplands' area 120 and we recommend that the design code and its landscape principles embrace the 'Strategy and guidelines for managing change' as contained within area 118 and 120. For example these include for 118:

- promote awareness and consideration of the setting of the AONB, and views to and from it, when considering development and land use change proposals on sites adjacent to the AONB
- develop a strategy to limit built development within the area and mitigate the impact of existing development either within or adjacent to the area on the edges of Berkhamsted and Hemel Hempstead
- encourage the retention of the existing pattern of hedges and to create new features to further enhance landscape and ecological links between woodlands and within the arable landscapes to the valley sides. Use the line of old field boundaries and/or rights of way where possible
- promote the appropriate management of woodland in order to conserve and where absent to re-establish a rich ground flora and the distinction between different management systems, such as high forest and coppice with standards. Encourage planting new hanging woodlands to the upper slopes with indigenous mixed broadleaves with a mix to include beech, ash and cherry within the valley floor
- encourage the planting and maintenance of willows, alder and poplar
- encourage the management and enhancement of existing wetland features within the valley floor environment, to re-create lost features and seek opportunities to create new features. To balance the recreational uses with the ecological value and to encourage a strategy to improve the water quality and quantity
- conserve and enhance the distinctive character of rural settings by promoting the conservation of important buildings and high standards of new building alterations to existing properties, all with the consistent use of traditional materials and designed to reflect the traditional character of each area
- ensure that local highway improvements are sympathetic to the scale, pattern and character of the existing road network

and for 120,

- utilise ancient hedge and field boundaries for the most appropriate location for woodland restoration and expansion
- encourage the reversal of habitat fragmentation and the creation and improvement of habitat links to create eco-corridors
- promote hedgerow restoration and creation throughout the area to provide visual and ecological links between existing and proposed woodland areas. gapping up to provide new uncropped or grass field margins to link areas of wildlife importance and/or existing and proposed rights of way



- promote the retention and restoration of existing orchards and the creation of new orchards. Encourage the use of traditional varieties of fruit and minimise the use of herbicides and pesticides
- maintain and develop the traditional pattern of roadside verges as a local feature and a wildlife resource.
- promote awareness and consideration of the setting of the AONB, and views to and from it, when considering development and land use change proposals on sites adjacent to the AONB
- encourage the restoration of open heathland and heathland planting where possible on the plateau.
- where possible, areas of chalk grassland should be encouraged to coincide with the outcrops of chalk at the heads of the valleys
- support a strategy to limit built development within the area and the visual impact of development that may affect the area from outside, including Hemel Hempstead.

(3) That a detailed set of lighting principles be published and adhered to, so that a soft edge is promoted and the promotion of a dark sky strategy within the AONB is not compromised by increase in glare as associated with new development. For example, all new lighting should be the minimum required and meet or exceed guidance for the environmental zone it is in. For example, downward pointing, shielded, operated on timer, and with a 'warm white' colour temperature of 2700-Kelvin maximum. Architectural designs should avoid light spill out of large areas of glazing.

(4) That the design coding for the outline application is part of a reserved matters / condition approval.

(5) That in delivery of the design principles the design code refers appropriately to the Chilterns Buildings Design Guide and Supplementary Technical Notes, as will apply.

CCB is grateful for the opportunity to submit these comments.

### **HCC Gypsy and Traveller Section (Liaison Officer)**

In regard to the consultation response.

I believe you have dealt with Charlie Sherfield in the past. Charlie has now left and I have taken over his position.

I am not sure what Charlie has said in the past in respect of this.

My understanding is that it is now the responsibility of the district to satisfy the needs of the traveller community. So I'm not sure what I can say in regard to the proposed site, other than we welcome any new site.

Particularly as our waiting list , and the assessment of needs suggests that we need new sites. Obviously we would be happy to advise in regard to plot layout, or anything else in regard to the plot.

Please come back to me should you wish to discuss this further.

### Additional Comments

I have just returned from holiday and have finally had the chance to look at your indicative layout for the traveller site.

Whilst I have not been able to share this with many of the traveller community, I have spoken to a handful of them, and they made the following comments.

They were very happy with the separate proposed access. This was in main, due to the fact that travellers change their mobile homes on a fairly regular basis. ( sometimes once every couple of years ). The separate access ensures that the settled community are not affected by this. When a mobile is delivered to a site it can severely disrupt the roads in the locality.

They were also happy with the pedestrian cycle connection in order to access schools and shops although some said they would be happy to drive up the road to access these facilities. They said that the location of the site enabled them to continue to maintain their culture and way of life. Some travellers feel that their way of life can be diluted if they have to much contact with the settled community.

They did raise concerns with regard to the closeness of the pumping station and what that may entail. Traveller sites have historically often been located next to a sewerage works or a recycling plant. So this may need to be looked at.

I hope you appreciate this is just the view of a handful of travellers and others may feel differently. However this is an opinion that I hear often when talking to travellers.

### Highway Authority

### *Decision*

Notice is given under article 18 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that the Hertfordshire County Council as Highway Authority recommends that permission be refused for the following reasons:

Hertfordshire County Council (HCC) as Highway Authority wishes to recommend refusal of the proposed development due to insufficient evidence to demonstrate that the proposed development would not have a severe impact on the highway network and due to insufficient evidence that the proposals are in line with planning policy, in particular HCC's Local Transport Plan 4 (LTP4).

### *Description of the Proposal*

The hybrid application is for a residential development of up to 1100 dwellings (including affordable homes) on a land known as LA3 Land West of Hemel Hempstead.

### *Site Description*

The site is located on agricultural land west of Hemel Hempstead. The site is bordered by Pouchen End Lane to the north and west, residential dwellings to the east and Chaulden Lane to the south.

### *Analysis*

A Design and Access Statement (DAS) is required for all planning applications that have an impact on the highway, as outlined in Roads in Hertfordshire: Design Guide (3rd Edition). One has been provided by the applicant.

A Transport Assessment (TA) would be required for a development of this size, as outlined in Roads in Hertfordshire: Highway Design Guide (3rd Edition). This was provided as part of the application submission and is considered acceptable.

### *Policy*

The applicant has provided a policy review as part of the submitted Transport Assessment, demonstrating consideration of the following policy documents:

- National Planning Policy Framework 2012 (NPPF);
- Manual for Streets (DfT);

- Design Manual for Roads and Bridges;
- Hertfordshire County Council Local Transport Plan 3: 2011-2031;
- Roads in Hertfordshire Highways Design Guide;
- Hemel Hempstead Urban Transport Plan (2009);
- Dacorum Borough Local Plan (1991-2011); and,
- Dacorum Core Strategy (2006 -2031).

The policy review is not considered up to date and HCC will require the following to be reviewed and considered:

- Hertfordshire County Council Local Transport Plan 4 (LTP4) 2018-2031; and,
- National Planning Policy Framework 2019 (NPPF).

### Trip Generation

Trip generation analysis is presented by C&A within the Transport Statement.

#### *Proposed Trip Generation*

Proposed vehicle trip generation of the site has also been calculated using TRICS. The assessment included an assessment of 'Private Housing', 'Mixed/Affordable Housing', 'Primary School', and 'Health/ GP Surgeries land use categories.

For the residential assessment, all UK sites were included except for those in Ireland and Greater London. Only sites with weekday surveys and 50 or more dwellings were selected. Both residential categories excluded one Edge of Town Centre Site. This TRICS selection is acceptable.

For the Primary School, all UK sites were included with the exception of those in Ireland and Greater London. Four Edge of Town Centre Sites were excluded. This TRICS selection is acceptable.

For the GP Practice, all UK sites were included except for those in Ireland and Greater London. GP surgeries with between 2 and 6 GPs were selected. The assessment excluded Edge of Town Centre Sites. This TRICS selection is acceptable.

The trip rates were agreed by HCC prior to the submission of the TA as part on ongoing pre-application discussion and are therefore considered acceptable.

The Transport Assessment states that following assumptions were made to calculate the trips associated with the site:

- 70% of dwellings will be assumed to be Privately owned and that 30% will be assumed to be affordable
- 60-part time nursery pupils have been agreed to be equivalent to 30 full time Primary pupils (this was agreed with senior school's planner).
- Trips associated with community hub shops and other uses are considered to be wholly internal to the site and as such these would not have an impact upon the external highway network and no further assessment of these is required.

The assumptions are acceptable.

Trip generation for the proposed gypsy & traveller site has not been considered in the TA and no explanation for its omission has been provided. The applicant should consider this as part of any amended submission or justify its omission.

### *Trip Distribution*

The applicant has provided local trip distribution and assignment diagrams as part of the TA. Traffic surveys were taken at 7 junctions in 2016 and existing turning movement proportions at the junctions were used to distribute the traffic. The traffic surveys are considered acceptable and this approach is therefore considered appropriate.

### *Residential*

A trip distribution methodology was agreed by HCC prior to the submission of the TA. The trip distribution is based upon Census 2011 Journey to Work data.

### *School*

The TA states that discussions were held between C&A and Dacorum's school's planner to identify a suitable catchment for pupils and staff.

The approaches used to the distribution of traffic on the network is considered acceptable.

### *Junction Capacity Analysis*

#### Committed Developments

The applicant has discussed a long list of committed developments with HCC. It was decided that only two of the committed developments should be considered. The considered committed developments include:

- Site E: Library and adjacent land, Combe Street Development: Demolition of library and construction of public Service Quarter and associated infrastructure
- Site K: Land off Dacorum Way between Marlowes, Combe Street and River Gade Development: Residential, 207 Units.

Whilst these are considered acceptable, there are additional developments to consider, as follows:

- Frogmore Road Industrial Estate, Frogmore Road Hemel Hempstead 4/01331/18/MFA
- The Beacon, Whiteleaf Road Hemel Hempstead 4/02368/17/MOA
- 499 & 501 London Road Hemel Hempstead 4/00104/18/MOA
- Button House, Pix Farm Lane Hemel Hempstead 4/02061/18/MFA

### *Growth Rates*

The applicant states that the most recent version of TEMPRO has been used to determine the forecast growth rate for the future year of 2022. The future year was agreed with HCC as part of earlier pre-application discussions; however, it is considered out of date and no longer applicable. The applicant should provide a five-year horizon year of 2024 and consideration of the build-out year at a minimum 2027 - an eight-year build-out period.

### *Traffic Surveys*

The following baseline traffic surveys were undertaken by the applicant:

- ATC on Long Chaulden
- ATC on Pouchen End
- ATC on each approach to Junction 4&5 on Long Chaulden, Boxted Road, Warners End Road and Northridge Way

The survey locations and date were agreed by HCC in advance.

### *Impact Assessment*

The TA examines the impact of the development on the capacity of local junctions. PICADY, ARCADY, JUNCTIONS 9, and VISSUM has been used for the assessment.

The assessed junctions include:

- J1 Proposed Long Chaulden Junction
- J2 Existing the Avenue/ Boxted Road Roundabout

- J3 Long Chaulden/ Northridge Way Roundabout
- J4 Long Chaulden/ Boxted Road Roundabout
- J5 Warners End Road/ Northridge Way Roundabout
- J6 Warners End Road/ Leighton Buzzard Road Roundabout
- J7 Northridge Way/ Fishery Road Roundabout
- J8 Fishery Road/ A4251 London

IT is considered that the junction of London Road and Two Waters Road should be considered as part of any future submission. This is a key junction for accessing the A41 and should be considered in any future assessment. Additionally, the junction mini-roundabout junctions on London Road with the A41 should be considered in more detail as they are also key junctions to gain access to the A41.

For the proposed development, capacity assessments were carried out for four scenarios;

- Observed 2016
- 2022 + Committed
- Phase 1 Development 2021 + Committed + Development (350 dwellings).
- Total Development 2022 + Committed + Development (1100 dwellings 2FE School + Nursery School).

However, as previously stated, the horizon year needs to be reconsidered due to the date of submission.

### *Road Safety*

Personal Injury Collision (PIC) Data was obtained from HCC for each junction tested in the TA. The PIC data was obtained for the 5-year period to June 2016. This is out of date and as the TA was submitted in 2019, it is expected that the most up to date collision data should be obtained and provided for consideration.

### *Highway Layout*

#### Access Arrangements

The proposal includes two site accesses.

The first is on the site frontage on Long Chaulden and is a priority junction. The second is an extension of The Avenue and has been designed as a Primary Road Bus Route.

The form of the proposed two junctions has been discussed and agreed with HCC as part of pre-application discussions. However, the detailed designs will be subject to review and agreement by HCC.

Localised widening on Chaulden Lane is proposed to ensure safe access along the highway. The proposed gypsy site access would be gained from Chaulden Lane and the proposed passing places would ensure that two-way traffic is safely accommodated. The proposed passing places would be subject to a S278 Agreement and review and approval as part of the agreement process.

### *Refuse and Servicing Arrangements*

A swept path analysis exercise has been undertaken to show the safe movement of the two-way buses, Emergency services, Refuse Collection, as well as access for Home deliveries and car for the Phase 1 development. These are acceptable.

### *Parking*

#### *Car Parking Provision*

The TA refers to Dacorum Borough Council's current parking standards which are included the Local Plan 1991-2011. The proposed development is located within Zone 4 and as such the maximum parking standards are applicable.

#### *Residential*

For the residential element of the proposal, this includes:

- 1.25 spaces per one-bedroom dwelling;
- 1.5 spaces per two-bedroom dwelling;
- 2.25 spaces per three-bedroom dwelling; and,
- 3 spaces per four-bedroom dwelling

However, the TA states that following a discussion with Dacorum the following parking standards have been agreed to be applied to the residential aspect of the development.

- 1 space per one- or two-bedroom flats;
- 1.5 spaces per two-bedroom house;
- 2 spaces per three-bedroom house, with a maximum of 3 spaces per house (including garages); and,
- 2-4 spaces per four-bedroom + house, with a maximum 6 spaces per house (including garages).



TA has not confirmed how many bays would be for electric vehicle spaces at the development. Dacorum parking standards require 20% active and 20% passive electric charging bays for all schemes with sites larger than 10 dwellings.

### *Community Hub*

The TA states that the community hub would contain a number of uses including a convenience store, A1 uses, Community Hall, Primary School, Nursery School, 1 and 2 bed flats, and a care home.

Parking for the Community Hub will be provided for with a combination of dedicated parking for each use as well as an area of shared parking provided in the square comprising of 35 spaces and on street parking providing 15 spaces.

Car parking is ultimately the decision of the LPA to decide; however, HCC as highway authority considers the proposals to be acceptable.

### *Cycle Parking*

#### *Residential*

Dacorum Borough Council Car Parking Standards for residential uses states that 1 cycle parking space should be provided per unit if there is no garage or shed provided.

The TA outlines Dacorum's requirements but does not state what provision will be provided for cycles. HCC requires that the applicant provide at least the minimum parking provision for cycles in order to promote the uptake of travel by sustainable means, in line with the LTP4 policy 1.

#### *Community Hub*

Cycle parking will be provided for each use either individually or communally as appropriate for long term and short term parking spaces in

accordance with the parking standards. HCC requires that the applicant provide at least the minimum parking provision for cycles in order to promote the uptake of travel by sustainable means, in line with the LTP4 policy 1.

### *Accessibility*

#### *Bus Services*

At present, the nearest bus stops to the site are on Long Chaulden Road. Bus Routes 3, ML1 and 4 can be accessed from these bus stops.

The proposals include providing a bus service through the site. There will need to be further discussion regarding the bus service proposals for Phase 2. The proposals appear to favour diverting the ML1. This would, however, reduce the slack in the timetable down to a point that may make the route less reliable. The ML1 takes a different route in the morning from the afternoon - if it were to be extended throughout the day, routeing and frequency would need to be determined. Route 3 and the ML1 do not offer the same thing and further discussion is needed on which is best to divert. The additional bus stops proposed need to be designed to enable access by all potential users including wheelchair users and incorporate easy access kerbing, shelter and display screens. They also need to be connected to the surrounding residential area by high quality foot and cycle routes.

### *Rail Services*

The nearest bus station to the site is Hemel Hempstead train station and is approximately 2.5 miles from the centre of the site. The station has services from Southern and West Midlands Trains with regular connections to end destinations Northampton, Milton Keynes Central, London Euston, and Birmingham New Street. Bus route ML1 provides access to/from the station from the site.

### *Walking/Cycling*

There are footways provided on both sides of Long Chaulden Road and the Avenue which provide connectivity to the wider network. The development proposals would include footway provisions to tie into the existing infrastructure.

There are currently no separate cycling provisions; however, the local highways are subject to speeds of 30mph and are wide with good visibility and are therefore considered generally suitable for cycling.

### *Travel Plan*

A Framework Travel Plan for the whole site and interim Travel Plan have been submitted for Phase 1. However, both documents only appear to cover the residential element of the development. Reference should be made to Appendix B of our guidance [www.hertfordshire.gov.uk/travelplans](http://www.hertfordshire.gov.uk/travelplans) which sets out the criteria for a Travel Plan. Based on the information provided in this application, the care home (if it is to be C2) will require a Full Travel Plan of its own and the convenience store (A1) will require a Travel Plan Statement. There will also be a requirement for the primary school to develop an appropriate School Travel Plan.

The Travel Plans submitted require some amendments. There is some clarification required in relation to when the baseline survey is planned for Phase 1 - 50%

occupation or after occupation of 150th dwelling. In other places (p18 para 6.2) it says after 50 dwellings but I assume this is a typo and means 50%.

Other comments are as follows:

### *Travel Plan Management*

- Travel Plan Co-Ordinator - contact details to be confirmed on appointment along with details of a secondary contact in case of personnel changes.
- Time allocated to role/frequency on site - an indication of time allocated to the role and frequency on site would be appropriate - this is a measure to demonstrate commitment to the implementation of the plan.
- Steering Group - a 'working group' is put forward but no mention is made of frequency of meetings and it appears to be intended only for the different Travel Plan Co-Ordinators to liaise. This group should be widened to include representatives of the different land uses on site. In this way, relevant parties can be actively engaged in the travel plan process which may give it better chance of success.

### *Measures*

- Measures put forward are appropriate although more could be included eg for walking and cycling - creation of on-site walking/cycling groups or information on local groups already in existence, information re cycle training and maintenance. Information provision is mentioned but not in great detail - eg needs to include provision of map of local amenities, map showing location of bus stops and routes to stops, timetable provision, information on ticketing offers. Car share - will this be promotion of regional providers? What about investigating the possibility for an on-site car share and provision of dedicated car share spaces?
- Travel Plans for the individual land uses should have measures appropriate to that particular land use eg the care home and convenience store could have measures that are rather different to the residential travel plan as places for employment.

### *Targets, Monitoring and Action Plan*

- We need confirmation of when the initial baseline survey will take place and therefore when modal shift targets will be confirmed - 50% occupation or after occupation of 150th dwelling. As the Phase 1 development is 350 units, 50% occupation would be after 175th dwelling was occupied.
- Given the size of this site, SAM standard monitoring should be used - please see [http://www.trics.org/why\\_monitor.aspx](http://www.trics.org/why_monitor.aspx). This is a method of monitoring ensures good quality data is obtained in a standardised way.

### *Construction*

A Construction Traffic Management Plan will be required to ensure construction vehicles will not have a detrimental impact on the highway in the vicinity of the site. A condition will be required to provide adequate parking for construction vehicles on-site to prevent on-street conflict and impacts to the highway safety. A Construction Traffic Management Plan will be required for all phases of the construction, including demolition, excavation and construction of all elements of the building.

#### *Section 184 or 278 Agreement*

As changes to the public highway are proposed as part of the development, a Section 184 or 278 agreement, whichever is most appropriate, will need to be secured and approved with HCC. As part of the agreement, any proposals will be subject to detailed design review and approval by HCC.

#### *Planning Obligations / Community Infrastructure Levy (CIL)*

The Community Infrastructure Levy is a planning charge tool for local authorities to help deliver infrastructure to support the development of their area. Dacorum Borough Council has a Community Infrastructure Levy (CIL), under which this site is zero-rated. Planning obligations have yet to be agreed but could include:

- Bus route subsidy
- Contribution towards off-site mitigation including filtered permeability to the SW of the site in the Winkwell area

#### *Summary*

HCC as highway authority wishes to recommend that the proposed development is refused, due to a lack of sufficient information to demonstrate that the proposals are safe and suitable and to demonstrate that the proposals are compliant with HCC's LTP4 and other recent, updated policy.

#### Comments Following Reconsultation

#### *Decision*

Hertfordshire County Council (HCC) as Highway Authority wishes to recommend permitting the proposed development subject to suitable conditions, mitigation measures on the local highway network and Section 106 contributions toward schemes and measures to mitigate the impact on the local highway network.

#### CONDITIONS

*Condition 1: Construction Traffic Management Plan*

No development shall commence until a Construction Traffic Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the construction of the development shall only be carried out in accordance with the approved Plan. The Construction Traffic Management Plan shall include details of:

- a. Construction vehicle numbers, type, routing;
- b. Access arrangements to the site;
- c. Traffic management requirements
- d. Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas);
- e. Siting and details of wheel washing facilities;
- f. Cleaning of site entrances, site tracks and the adjacent public highway;
- g. Timing of construction activities (including delivery times and removal of waste) and to avoid school pick up/drop off times;
- h. Provision of sufficient on-site parking prior to commencement of construction activities;
- i. Post construction restoration/reinstatement of the working areas and temporary access to the public highway;
- j. Where works cannot be contained wholly within the site a drawing should be submitted showing the site layout on the highway including extent of hoarding, pedestrian routes and remaining road width for vehicle movements.

Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way in accordance with Policies 5, 12, 17 and 22 of Hertfordshire's Local Transport Plan (adopted 2018).

*Condition 2: Detailed Design Drawings*

No development shall commence until full details (in the form of scaled plans and / or written specifications) have been submitted to and approved in writing by the Local Planning Authority to illustrate the following:

- i) Roads, footways.
- ii) Cycleways.
- iii) Foul and surface water drainage.
- iv) Visibility splays.
- v) Access arrangements.
- vi) Parking provision in accordance with adopted standard.
- vii) Loading areas.
- viii) Turning areas.

Reason: To ensure suitable, safe and satisfactory planning and development of the site in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018)

*Condition 3: New Access(es)*

Prior to the first occupation / use of the development hereby permitted the vehicular access shall be provided and thereafter retained at the position shown on the

approved plan Figure 8 of the Transport Assessment in accordance with the highway specification 16-021-071 attached. Arrangement shall be made for surface water drainage to be intercepted and disposed of separately so that it does not discharge from or onto the highway carriageway.

Reason: To ensure satisfactory access into the site and avoid carriage of extraneous material or surface water from or onto the highway in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

*Condition 4: Estate Road Management*

No development shall commence until full details have been submitted to and approved in writing by the Local Planning Authority in relation to the proposed arrangements for future management and maintenance of the proposed streets within the development. (The streets shall thereafter be maintained in accordance with the approved management and maintenance details until such time as an agreement has been entered into under Section 38 of the Highways Act 1980 or a Private Management and Maintenance Company has been established).

Reason: To ensure satisfactory development and to ensure estate roads are managed and maintained thereafter to a suitable and safe standard in accordance with Policies 5 and 22 of Hertfordshire's Local Transport Plan (adopted 2018)

*Condition 5: Existing Access (Improved/Widened)*

Prior to the first occupation / use hereby permitted the vehicular access point from The Avenue shall be constructed in accordance with the approved drawing(s) of this feature. Prior to use arrangements shall be made for surface water drainage to be intercepted and disposed of separately so that it does not discharge from or onto the highway carriageway.

Reason: To ensure construction of a satisfactory access and in the interests of highway safety, traffic movement and amenity in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

*Condition 6A: Framework Travel Plan*

At least 3 months prior to the first occupation / use of the approved development a revised Framework Travel Plan for the site, based upon the Hertfordshire Council document 'Hertfordshire's Travel Plan Guidance', shall be submitted and approved in writing by the Local Planning Authority. The approved Travel Plan shall be implemented at all times.

Reason: To ensure that sustainable travel options associated with the development are promoted and maximised to be in accordance with Policies 3, 5, 7, 8, 9 and 10 of Hertfordshire's Local Transport Plan (adopted 2018).

*Condition 6B: Travel Plan*

No part of the development hereby permitted shall be occupied prior to the approval of the Framework Travel Plan and the approval of the relevant Plot Travel Plans and the implementation of those parts identified in the approved Framework Travel Plan as capable of being implemented prior to occupation. Those parts of the approved Overall Travel Plan and the Plot Travel Plans implemented in accordance with the timetable contained therein shall continue to be implemented as long as any part of the development is occupied.

Reason: To ensure that sustainable travel options associated with the development are promoted and maximised to be in accordance with Policies 3, 5, 7, 8, 9 and 10 of Hertfordshire's Local Transport Plan (adopted 2018).

*Condition 7: Cycle Parking*

Prior to the first occupation /use of the development hereby permitted a scheme for the parking of cycles including details of the design, level and siting of the proposed parking shall be submitted to and approved in writing by the Local Planning Authority

The approved scheme shall be fully implemented before the development is first occupied or brought into use and thereafter retained for this purpose.

Reason: To ensure the provision of adequate cycle parking that meets the needs of occupiers of the proposed development and in the interests of encouraging the use of sustainable modes of transport in accordance with Policies 1, 5 and 8 of Hertfordshire's Local Transport Plan (adopted 2018)

*Condition 8: Highway Improvements (Design Approval)*

Notwithstanding the details indicated on the approved drawings of these features, no on-site works above slab level shall commence in any phase until detailed schemes for the offsite highway improvement works associated with it been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure construction of a satisfactory development and that the highway improvement works are designed to an appropriate standard in the interest of highway safety and amenity and in accordance with Policy 5, 13 and 21 of Hertfordshire's Local Transport Plan (adopted 2018).

*Condition 9: Highway Improvements (Implementation / Construction)*

Prior to the first occupation /use of any phase of the development hereby permitted the offsite highway improvement works associated with it shall be completed in accordance with the approved details.

Reason: To ensure construction of a satisfactory development and that the highway improvement works are designed to an appropriate standard in the interest of highway safety and amenity and in accordance with Policy 5, 13 and 21 of Hertfordshire's Local Transport Plan (adopted 2018).

HIGHWAY INFORMATIVES

HCC recommend inclusion of the following Advisory Notes (ANs) to ensure that any works as part of this development are carried out in accordance with the provisions of the Highways Act 1980 and other relevant processes.

AN1) Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence. Further information is available via the website <https://www.hertfordshire.gov.uk/services/Highways-roads-and-pavements/Highways-roads-and-pavements.aspx> or by telephoning 0300 123 4047.

AN2) Obstruction of public highway land: It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence. Further information is available via the website <https://www.hertfordshire.gov.uk/services/Highways-roads-and-pavements/Highways-roads-and-pavements.aspx> or by telephoning 0300 123 4047.

AN3) Road Deposits: It is an offence under section 148 of the Highways Act 1980 to deposit mud or other debris on the public highway, and section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure that all vehicles leaving the site during construction of the development are in a condition such as not to emit dust or deposit mud, slurry or other debris on the highway. Further information is available via the website <https://www.hertfordshire.gov.uk/services/Highways-roads-and-pavements/Highways-roads-and-pavements.aspx> or by telephoning 0300 123 4047.

### *Section 106 Agreement*

Should permission be granted, a Section 106 Agreement will be required to secure contributions toward local transport schemes and sustainable transport to support the development. Hertfordshire County Council would require Section 106 contributions toward the following:

- £10,000 toward the consultation on and implementation of a Traffic Regulation Order to enforce a road closure or other restriction if deemed necessary to address any impacts on the Winkwell area due to existing traffic conditions in the area. toward off-site mitigation including filtered permeability to the SW of the site in the Winkwell area. Any funds unspent would be returned to the developer.
- Up to £850,000 toward diversion of and improvement to the bus route through the development site. The total figure is subject to further discussions with HCC and bus operator Arriva based on the rebate principle.



- A sum of £6,000 per Travel Plan towards the County Council's costs of administering and monitoring the objectives of the Travel Plans and engaging in any Travel Plan Review will be required.

### *Section 278 Agreement*

A single Section 278 Agreement or individual agreements, depending on delivery phasing and triggers, is required as there are proposed changes to the local highway network to support the development. The Section 278 Agreement(s) should cover the following changes to the local highway network:

- 1) Proposed new access onto Long Chaulden (drg 16-021-071).
- 2) Proposed access from The Avenue (drg 16/021/149).
- 3) Proposed access to the proposed gypsy and traveller site from Chaulden Lane (drg 16-021-010).
- 4) Mitigation measures at the following junctions in line with the associated design drawings:
  - i. Long Chaulden / Northridge Way Mini-Roundabout (drg 16-021-072)
  - ii. Long Chaulden / Boxted Road / Warners End Road / Northridge way Mini-Roundabouts (drg 16-021-067)
  - iii. Warners End Road / Leighton Buzzard Road Roundabout (drg 16-021-069)
  - iv. Northridge Way / Fishery Road Roundabout (drg 16-021-073)
  - v. Fisher Road / A4251 London Road Roundabout (drg 16-021-068)
- 5) Local widening on Chaulden Lane to support safe passage of vehicles leading to the gypsy and traveller site (drg 16-021-010).
- 6) Emergency Access / Potential Footway/Cycleway (drg 16-021-010).

### *Section 38 Agreement*

A Section 38 Agreement will be required to support the adoption of the spin road through the proposed development site. Any highway put forward for adoption would be subject to this agreement.

### *Description of the Proposal*

The hybrid application is for a residential development of up to 1100 dwellings (including affordable homes) on a land known as LA3 Land West of Hemel Hempstead.

### *Site Description*

The site is located on agricultural land west of Hemel Hempstead. The site is bordered by Pouchen End Lane to the north and west, residential dwellings to the east and Chaulden Lane to the south.

## *Analysis*

A Design and Access Statement (DAS) is required for all planning applications that have an impact on the highway, as outlined in Roads in Hertfordshire: Design Guide (3rd Edition). One has been provided by the applicant.

A Transport Assessment (TA) would be required for a development of this size, as outlined in Roads in Hertfordshire: Highway Design Guide (3rd Edition). This was provided as part of the application submission and is considered acceptable. The applicant has provided a Transport Assessment Addendum and a Response to HA Comments document to support the application submission which seeks to address the issues identified by Hertfordshire County Council as highway authority. This is acceptable.

A number of other documents have been provided by the applicant, including junction design drawings, amended junction capacity assessment reports, etc.

## *Policy*

The applicant had provided a policy review as part of the submitted Transport Assessment, demonstrating consideration of the following policy documents:

- National Planning Policy Framework 2012 (NPPF);
- Manual for Streets (DfT);
- Design Manual for Roads and Bridges;
- Hertfordshire County Council Local Transport Plan 3: 2011-2031;
- Roads in Hertfordshire Highways Design Guide;
- Hemel Hempstead Urban Transport Plan (2009);
- Dacorum Borough Local Plan (1991-2011); and,
- Dacorum Core Strategy (2006 -2031).

The policy review was not considered up to date and HCC required that the following to be reviewed and considered:

- Hertfordshire County Council Local Transport Plan 4 (LTP4) 2018-2031; and,
- National Planning Policy Framework 2019 (NPPF).

As part of the Transport Assessment Addendum submitted, the applicant has provided evidence of review of HCC's LTP4, South West Herts Growth and Transport Plan March 2019 and the amended NPPF 2019. This is considered acceptable.

## *Trip Generation*

Trip generation analysis is presented by transport consultant C&A within the Transport Statement.

## *Proposed Trip Generation*

Proposed vehicle trip generation of the site has also been calculated using TRICS. The assessment included an assessment of 'Private Housing', 'Mixed/Affordable Housing', 'Primary School', and 'Health/ GP Surgeries land use categories.

For the residential assessment, all UK sites were included except for those in Ireland and Greater London. Only sites with weekday surveys and 50 or more dwellings were selected. Both residential categories excluded one Edge of Town Centre Site. This TRICS selection is acceptable.

For the Primary School, all UK sites were included with the exception of those in Ireland and Greater London. Four Edge of Town Centre Sites were excluded. This TRICS selection is acceptable.

For the GP Practice, all UK sites were included except for those in Ireland and Greater London. GP surgeries with between 2 and 6 GPs were selected. The assessment excluded Edge of Town Centre Sites. This TRICS selection is acceptable.

The trip rates were agreed by HCC prior to the submission of the TA as part on ongoing pre-application discussion and are therefore considered acceptable.

The Transport Assessment states that following assumptions were made to calculate the trips associated with the site:

- 70% of dwellings will be assumed to be Privately owned and that 30% will be assumed to be affordable
- 60-part time nursery pupils have been agreed to be equivalent to 30 full time Primary pupils (this was agreed with senior school's planner).
- Trips associated with community hub shops and other uses are considered to be wholly internal to the site and as such these would not have an impact upon the external highway network and no further assessment of these is required.

The assumptions are acceptable.

Trip generation for the proposed gypsy & traveller site had not been considered in the TA and no explanation for its omission had been provided. The applicant was requested to consider this as part of any amended submission or justify its omission. As part of the TA Addendum and response to HA Comment document, the applicant included a trip generation profile for the gypsy and traveller site. The review is considered acceptable.

#### *Trip Distribution*

The applicant provided local trip distribution and assignment diagrams as part of the TA. Traffic surveys were taken at 7 junctions in 2016 and existing turning movement proportions at the junctions were used to distribute the traffic. The traffic surveys are considered acceptable and this approach is therefore considered appropriate.

#### *Residential*

A trip distribution methodology was agreed by HCC prior to the submission of the TA. The trip distribution is based upon Census 2011 Journey to Work data.

### *School*

The TA states that discussions were held between C&A and HCC's school planner for Dacorum to identify a suitable catchment for pupils and staff.

The approaches used to the distribution of traffic on the network is considered acceptable.

### *Junction Capacity Analysis*

#### *Committed Developments*

The applicant has discussed a long list of committed developments with HCC. It was originally decided that only two of the committed developments should be considered. The considered committed developments include:

- Site E: Library and adjacent land, Combe Street Development: Demolition of library and construction of public Service Quarter and associated infrastructure
- Site K: Land off Dacorum Way between Marlowes, Combe Street and River Gade Development: Residential, 207 Units.

Whilst these were considered acceptable, as part of HCC's initial application review, HCC requested that the applicant consider the following committed developments:

- Frogmore Road Industrial Estate, Frogmore Road Hemel Hempstead 4/01331/18/MFA
- The Beacon, Whiteleaf Road Hemel Hempstead 4/02368/17/MOA
- 499 & 501 London Road Hemel Hempstead 4/00104/18/MOA
- Button House, Pix Farm Lane Hemel Hempstead 4/02061/18/MFA

As part of both the TA Addendum and response document, the applicant provided a review of each of the committed development flows and assessed junctions to justify why they did not need to be considered further. The approach taken within these documents is considered acceptable for the purposes of this assessment.

### *Growth Rates*

The applicant stated that the most recent version of TEMPRO has been used to determine the forecast growth rate for the future year of 2022. The future year was agreed with HCC as part of earlier pre-application discussions; however, it was considered out of date and no longer applicable. The applicant was requested to provide a five-year horizon year of 2024 and consideration of the build-out year at a minimum 2027 – an eight-year build-out period.

As part of the amended documents, the applicant has provided the growth factors for the requested horizon years 2024 and 2027, this is considered acceptable.

### *Traffic Surveys*

The following baseline traffic surveys were undertaken by the applicant:

- Automatic Traffic Counts (ATC) on Long Chaulden
- ATC on Pouchen End
- ATC on each approach to Junction 4&5 on Long Chaulden, Boxted Road, Warners End Road and Northridge Way

The survey locations and date were agreed by HCC in advance.

### *Impact Assessment*

The TA examines the impact of the development on the capacity of local junctions. Industry-standard programs PICADY, ARCADY, JUNCTIONS 9, and VISSUM have been used for the assessment.

The assessed junctions were:

- J1 Proposed Long Chaulden Junction
- J2 Existing the Avenue/ Boxted Road Roundabout
- J3 Long Chaulden/ Northridge Way Roundabout
- J4 Long Chaulden/ Boxted Road Roundabout
- J5 Warners End Road/ Northridge Way Roundabout
- J6 Warners End Road/ Leighton Buzzard Road Roundabout
- J7 Northridge Way/ Fishery Road Roundabout
- J8 Fishery Road/ A4251 London

As part of HCC's original review of the submitted documents, it was considered that the junction of London Road and Two Waters Road should be considered as part of any future submission. This is a key junction for accessing the A41 and should be considered in any future assessment. Additionally, the junction mini-roundabout junctions on London Road with the A41 should be considered in more detail as they are also key junctions to gain access to the A41.

For the proposed development, capacity assessments were carried out for four scenarios as part of the original application submission:

- Observed 2016
- 2022 + Committed
- Phase 1 Development 2021 + Committed + Development (350 dwellings).
- Total Development 2022 + Committed + Development (1100 dwellings 2FE school + nursery school).

However, as previously stated, the horizon year was requested to be reconsidered do to the date of submission. The applicant has since addressed this concern and the following scenarios were considered in the new documents:

- Observed 2016 (J2 to J8);
- Observed 2019 (J9);

- 2024 + Committed Development;
- 2024 + Committed + Phase 1 Development;
- 2024 + Committed + Total Development (1 + 2);
- 2027 + Committed + Phase 1 Development; and, - 2027 + Committed + Total Development (1 + 2).

The amended scenarios are considered acceptable.

The junction capacity results were summarised in the TA Addendum and are summarised below.

#### Junction 2: The Avenue/ Boxted Road Roundabout

This junction is shown to operate in capacity for all considered scenarios.

#### Junction 3: Long Chaulden/ Northridge Way Mini-Roundabout

For the 2024 Background + Committed scenario, the junction modelling demonstrates that the junction would operate over capacity in both the AM And PM peak scenarios. For the AM peak, a predicted RFC of 1.01 and queue of 20 PCUs for the Northridge Way North junction arm was anticipated. For the PM peak, an RFC of 1.09 and queue of 48 PCUs was predicted for the Northridge Way South junction arm. It is evident that with background growth and committed development traffic, the junction already reaches and exceeds its capacity. As the junction is already operating over its capacity, addition of development traffic pushes the junctions further over capacity, with predicted queues for the AM peak on the Northridge Way North arm going to 33 PCUs with Phase 1 Development and up to 71 PCUs with all development.

The 2027 Background + Committed scenario, as in the 2024 scenario, shows that the junction operates over capacity. It is worth noting that the 2027 Background + Committed development predicted results are showing the junction to operate slight better than the 2024 + Background + Committed + Phase 1 development scenario. On this basis, it is evident that the development would have severe impact on this junction and mitigation should be provided. The applicant has stated the mitigation would be recommended and this will be discussed later.

#### Junction 4 and 5: London Chaulden/ Boxted Road / Warners End Road / Northridge Way Mini-Roundabout

VISSIM was utilised to assess this junction which provide capacity results by average delay, average speed, and maximum queues. The VISSIM results demonstrate that in the 2024 horizon year, the total development would increase vehicle delay by 34 seconds (nearly double) in the AM peak and by 30 seconds in the PM peak. The associated queues from the model show that, for the AM peak, the average queue for the Boxted Road arm increased by 35 vehicles and the maximum queue increased by 5. Whilst the maximum queue only increased by 5, the average queue increases by 35 vehicles, which would suggest that the development is having a significant impact on the operation of the junction in the AM peak. Similarly, in the PM peak, the average queue for the Warners End Road junction arm increases by 17 vehicles, where the maximum increases by 13 vehicles. The Northridge Way arm also experiences an average queue length increase by 15 vehicles and maximum queue reduces by 1 vehicle. This suggests that the junction is operating with higher

queues through the peak hour. As in the AM peak, it is evident that the development would have a severe impact on the operation of the junction. Therefore, the applicant would be expected to provide mitigation.

The 2027 compared scenarios would suggest that the development is not impacting the junction as severely; however, it is still clear that in the opening year, the development will have an impact and this should be mitigated. The applicant has stated the mitigation would be recommended and this will be discussed later.

#### Junction 6: Warners End Road/ Leighton Buzzard Road Roundabout

For the 2024 Background + Committed development scenario, the junction is shown to already be operating over desired operational capacity with the Warners End Road junction arm operating with an RFC of 1.09 and associated queue of 56 PCUs in the AM peak hour. In the PM peak both B487 and A4146 (s) junction arms are operating over capacity with RFCs of 0.97 and 0.89, respectively. Their associated queues are 18 and 7 PCUs, respectively.

In the 2024 Background + Committed + Phase 1 scenario, in the AM peak, the RFC and queue on the Warners End Road junction arm increase to 1.14 and 84 PCUs, respectively. This indicates that the junction is impacted by the proposed development in the AM peak hour. Likewise, in the PM peak hour, the RFC and queue on the B487 increase to 0.99 and 24 PCUs, respectively. The RFC and queue on the A4146 (S) arm increases to 0.93 and 10 PCUs, respectively. As in the AM peak, it is clear that the proposed development is impacting the operation of the junction in the PM peak. When the total development is added (2024 Background + Committed + Total Development), the impact in each of the peaks increases exponentially. This is because the junction is at capacity. Based on the impact in the 2024 horizon year, mitigation is required at this junction.

2027 Background + Committed development at this junction presents a similar impact as the Phase 1 development, when compared to the 2024 background + Committed development scenario. On this basis, the impact of the development traffic worsens the operation of the junction in line with the above; however, RFC and queue values are higher. The applicant has stated the mitigation would be recommended and this will be discussed later.

#### Junction 7: Northridge Way/ Fishery Road Roundabout

The 2024 Background + Committed scenario of the junction modelling demonstrates that the junction would operate within desired operational capacity in the AM peak; however, the Fishery Road junction arm would operate over capacity for the PM peak with an RFC of 0.96 and associated queue of 14.5 PCUs.

The 2024 Background + Committed + Phase 1 Development scenario of the junction modelling demonstrates that in the AM peak the Northridge Way junction is pushed over desired operational capacity to an RFC of 0.87 from 0.83 and a queue of 6 PCUs from 5 PCUs. In the PM peak, the Fishery Road junction arm operational capacity worsens to an RFC of 1.00 and associated queue of 22 PCUs. When the total development is added to the network, the operation of the Northridge Way junction arm in the AM peak worsens to an RFC of 0.96 and associated queue of 14.4 PCUs and the Fishery Road junction arm in the PM peak worsens to an RFC of

1.08 and associated queue of 53 PCUs. On this basis, HCC would expect mitigation at this location.

When observing the 2027 scenarios, a similar trend is observed. Therefore, HCC require mitigation at this location. The applicant has stated the mitigation would be recommended and this will be discussed later.

#### Junction 8: Fisher Road/ A4251 London Road Roundabout

The 2024 Background + Committed scenario of the junction modelling demonstrates the junction would likely operate over capacity on the Fishery Road junction arm in the AM peak and the A4251 (W) junction arm in the PM peak. The Fishery Road junction arm would have an RFC of 1.04 and associated queue of 30.6 PCUs in the AM peak and the A4251 (W) junction arm would have an RFC of 1.0 and associated queue of 42.4 PCUs in the PM peak.

The 2024 Background + Committed + Phase 1 Development scenario of the junction modelling demonstrates that in the AM peak the Fishery Road junction arm capacity increases to an RFC of 1.09 and associated queue of 48 PCUs, with the A4251 (W) junction arm capacity increasing to an RFC of 1.11 and associated queue of 55 PCUs in the PM peak. This demonstrates that the proposed development Phase 1 traffic would impact the operation of the junction and would require mitigation. When the total development traffic is added to the network, the operation of the Fishery Road junction arm increases to an RFC of 1.19 and associated queue of 93 PCUs in the AM peak. The A4251 (W) junction arm capacity goes to an RFC of 1.18 and associated queue of 83 PCUs in the PM peak. On this basis, the proposed development is required to provide mitigation at this junction.

When observing the 2027 scenarios, a similar trend is observed. Therefore, HCC require mitigation at this location. The applicant has stated the mitigation would be recommended and this will be discussed later.

#### Junction 9: A414 Two Water Road/ A4251 London Road

In a technical note provided by the applicant, a review of the operation of this junction was considered.

Representations were made on behalf of residents in the Winkwell area to the SW of the site by the Bourne End Village Association (BEVA). The likely impact of the development on it was assessed as part of additional work undertaken by the applicants' transport consultant. This was summarised in section 7 of the Transport Assessment Addendum document dated July 2019. The highway authority agrees with the assessment that additional traffic generated by the development ten trips in the morning and evening rush hours. These increases could not be judged to be severe impacts however the applicant has agreed to make available a sum of up to £10,000 via a Section 106 agreement to be used by the highway authority towards the cost of the Traffic Regulation Order associated with any access restriction required should its own investigation of these concerns judge them to be required.

#### *Mitigation Measures*



Mitigation has been proposed at a few the junctions considered as part of the assessment. Mitigation measures, along with their impact on the operation of the junctions, are summarised by junction.

#### Junction 3: Long Chaulden / Northridge Way Mini-Roundabout

The mitigation proposed at this location includes widening of approach lanes, amended zebra crossing on the southern junction arm, and would require relocated gullies.

Junction modelling was undertaken of the proposed changes and it is demonstrated that the redesign would mitigate against the impacts of the development traffic. On this basis, it is considered acceptable; however, the mitigation proposals would be subject to Section 278 Agreement and as part of this detailed design review of the proposals. A safety audit will also be required to support that the changes would not result in any safety implications. Any design should not disadvantage pedestrians and cyclists, in line with LTP4 Transport User Hierarchy.

#### Junctions 4 and 5: London Chaulden / Boxted Road / Warners End Road / Northridge Way Mini-Roundabout

The mitigation proposed at this location includes widening of the main carriageway to provide turning lanes, widening of entry lanes, etc. Widening of the carriageway requires taking up large sections of footway.

The junction modelling of the proposed changes shows that the changes would improve the operation of the network, particular for Boxted Road and Northridge Way.

This was originally considered counter to LTP4 policy which puts an emphasis on encouraging the uptake of walking and cycling as a form of transport. HCC requested other mitigation options be explored – these could have included improvements to bus priority and measures to encourage walking, cycling or public transport usage. The applicant has subsequently provided HCC with a response to previous comments and HCC are satisfied that the footways that would remain would be sufficient to accommodate demand. These designs would still be subject to Section 278 Agreement and as part of this detailed design review of the proposals. A safety audit will also be required to support that the changes would not result in any safety implications.

#### Junction 6: Warners End Road/ Leighton Buzzard Road Roundabout

The mitigation proposed at this location includes lane widening and extension of flares to accommodate more vehicles through the junction. The measures would also see the central island made smaller to allow for the circulatory to be widened.

Junction modelling was undertaken of the proposed changes and it is demonstrated that the redesign would mitigate against the impacts of the development traffic. On this basis, it is considered acceptable; however, the mitigation proposals would be subject to Section 278 Agreement and as part of this detailed design review of the proposals. A safety audit will also be required to support that the changes would not result in any safety implications. Any design should not disadvantage pedestrians and cyclists, in line with LTP4 Transport User Hierarchy.

#### Junction 7: Northridge Way/ Fishery Road Roundabout

The mitigation proposed at this location includes improved pavement markings at each of the junction arms and realignment of the kerb line on the Northridge Way junction arm.

Junction modelling was undertaken of the proposed changes and it is demonstrated that the redesign would not mitigate against the development traffic. Whilst the proposed mitigation did improve the operation compared to the existing. Whilst it is noted that the RFC levels are similar, the queues are still observed to increase by 14 PCUs which is significant. On this basis, HCC required revisions to the proposals. The applicant has since provided additional information to support the mitigation proposals, including additional amendments to the design of the junction mitigation measures. The modelling and the design are considered acceptable. However, the mitigation proposals would be subject to Section 278 Agreement and as part of this detailed design review of the proposals. A safety audit will also be required to support that the changes would not result in any safety implications. Any design should not disadvantage pedestrians and cyclists, in line with LTP4 Transport User Hierarchy.

#### Junction 8: Fisher Road/ A4251 London Road Roundabout

The mitigation proposed at this location includes improved pavement markings on all approaches, including providing a dedicated left turn lane on London Road west junction arm, improved give way markings, hatching at the bus / rail station exit only junction arm, etc. The measures also include a kerb line alternation on the London Road East approach arm and extended shared cycle/footway provisions on the north side of the London Road East junction arm. The proposals include an extension of the two lanes on the Fishery Road approach arm; however, there did not appear to be sufficient width to accommodate this arrangement. Dimensions were required to confirm this is accurate.

The junction modelling undertaken of the proposed changes demonstrates that the proposed redesign would improve on the operation of the junction. The results of the 2027 Base + Committed + Development scenario with the proposed mitigation is shown to operate better than the 2027 Base + Committed scenario without mitigation.

Junction modelling was undertaken of the proposed changes and it is demonstrated that the redesign would mitigate against the development traffic. However, as previously noted, additional information was required to support that the proposed improvements are feasible.

The applicant has since provided HCC with additional information which demonstrated that the proposals are satisfactory. On this basis, it is considered the mitigation is acceptable; however, any mitigation proposals would be subject to Section 278 Agreement and as part of this detailed design review of the proposals. A safety audit would also be required to support that the changes would not result in any safety implications. Any design should not disadvantage pedestrians and cyclists, in line with LTP4 Transport User Hierarchy.

The applicant has proposed the following trigger points for implementation

<b>Junction</b>	<b>Implementation Trigger</b>
J1A Proposed Long Chaulden Access	1 <sup>st</sup> occupation
J1B The Avenue	Towards the end of the phase 1 development once the Link Road has been constructed. Early provision at the discretion of the developer.
J3 Long Chaulden/ Northridge Way Improvement	140 dwellings
J4&5 Long Chaulden/ Warners End Road Improvement Double Mini	500 occupations
J6 Warners End Road/ Leighton Buzzard Road Improvement	115 occupations
J7 St Johns Road/ Fishery Road Improvement	400 occupations
J8 London Road/Fishery Road Improvement	100 occupations

These are agreed to by the highway authority. However, they would be subject to review as detailed planning permission is sought.

#### *Road Safety*

Personal Injury Collision (PIC) Data was obtained from HCC for each junction tested in the TA. The PIC data was obtained for the 5-year period to June 2016. This was considered out of date and as the TA was submitted in 2019, it is expected that the most up to date collision data should have been obtained and provided for consideration. The applicant has since provided a summary of the most recent five years of collision data obtained from HCC. The results of this exercise showed that there do not appear to be any trends of collision on the local highway network. On this basis, it is anticipated that the proposed development would not impact on the safety of the local highway network.

All of the proposed mitigation measures would be subject to Road Safety Audit as part of their detailed design.

#### *Highway Layout*

##### *Access Arrangements*

The proposal includes two site accesses.

The first is on the site frontage on Long Chaulden and is a priority junction. The second is an extension of The Avenue and has been designed as a Primary Road Bus Route.

The form of the proposed two junctions has been discussed and agreed with HCC as part of pre-application discussions. However, the detailed designs will be subject to

review and agreement by HCC prior to their installation under a Section 278 Agreement.

Localised widening on Chaulden Lane is proposed to ensure safe access along the highway. The proposed gypsy site access would be gained from Chaulden Lane and the proposed passing places would ensure that two-way traffic is safely accommodated while large caravans are brought into or taken out of the site. The proposed passing places would be subject to a S278 Agreement with safety review and approval as part of the agreement process.

### *Refuse and Servicing Arrangements*

A swept path analysis exercise has been undertaken to show the safe two-way movement of buses, emergency services, refuse collection, as well as access for home deliveries and car for the Phase 1 development. These are acceptable.

### *Road adoption*

The county council will only consider taking responsibility via adopting under section 38 of the Highways Act roads that are built to its standards, are connected to the public highway network and demonstrate utility to the public. The last of these is described in chapter 12 of section 3 of HCC highway design guide Roads in Hertfordshire. It precludes the adoption of cul-de-sac roads which effectively act as shared private drives.

Roads not adopted by HCC should be managed by a management company or similar arrangement made by the developer of the phase/ element.

### *Parking*

#### *Car Parking Provision*

The TA refers to Dacorum Borough Council's current parking standards which are included the Local Plan 1991-2011. The proposed development is located within Zone 4 and as such the maximum parking standards are applicable.

#### *Residential*

For the residential element of the proposal, this includes:

- 1.25 spaces per one-bedroom dwelling;
- 1.5 spaces per two-bedroom dwelling;
- 2.25 spaces per three-bedroom dwelling; and,
- 3 spaces per four-bedroom dwelling

However, the TA states that following a discussion with Dacorum the following parking standards have been agreed to be applied to the residential aspect of the development.

- 1 space per one- or two-bedroom flats;
- 1.5 spaces per two-bedroom house;

- 2 spaces per three-bedroom house, with a maximum of 3 spaces per house (including garages); and,
- 2-4 spaces per four-bedroom + house, with a maximum 6 spaces per house (including garages).

The TA had not confirmed how many bays would be for electric vehicle spaces at the development. Dacorum parking standards require 20% active and 20% passive electric charging bays for all schemes with sites larger than 10 dwellings. The applicant has since stated in the addendum documents that EV charging will be provided in line with national and local policies. This is acceptable.

### *Community Hub*

The TA states that the community hub would contain several uses including a convenience store, A1 uses, Community Hall, Primary School, Nursery School, 1 and 2-bed flats, and a care home.

Parking for the Community Hub will be provided for with a combination of dedicate parking for each use as well as an area of shared parking provided in the square comprising of 35 spaces and on street parking providing 15 spaces.

Car parking is ultimately the decision of the LPA to make; however, HCC as highway authority considers the proposals to be acceptable.

### *Cycle Parking*

#### *Residential*

Dacorum Borough Council Car Parking Standards for residential uses states that 1 cycle parking space should be provided per unit if there is no garage or shed provided.

The TA outlines Dacorum's requirements but does not state what provision will be provided for cycles. HCC requires that the applicant provide at least the minimum parking provision for cycles in order to promote the uptake of travel by sustainable means, in line with the LTP4 policy 1.

#### *Community Hub*

Cycle parking will be provided for each use either individually or communally as appropriate for long term and sort term parking spaces in accordance with the parking standards. HCC requires that the applicant provide at least the minimum parking provision for cycles in order to promote the uptake of travel by sustainable means, in line with the LTP4 policy 1.

### *Accessibility*

#### *Bus Services*

At present, the nearest bus stops to the site are on Long Chaulden. Bus services 3, ML1 and 4 can be accessed from these bus stops.

The proposals include providing a bus service through the site in order to promote mode shift away from the private car. Discussion regarding the bus service proposals are ongoing and should be concluded in order to give certainty about the application and the obligations to be required via a S106 agreement. It is currently envisaged that a contribution of up to £850,000 toward diversion of and improvement to the bus route through the development site will be required. The total figure is subject to further discussions with HCC and bus operator Arriva based on the rebate principle.

The additional bus stops proposed need to be designed to enable access by all potential users including wheelchair users and incorporate easy access kerbing, shelter and display screens. They also need to be connected to the surrounding residential area by high quality pedestrian routes.

### *Rail Services*

The nearest bus station to the site is Hemel Hempstead train station and is approximately 2.5 miles from the centre of the site. The station has services from Southern and West Midlands Trains with regular connections to end destinations Northampton, Milton Keynes Central, London Euston, and Birmingham New Street. Bus route ML1 provides access to/from the station from the site.

### *Walking/Cycling*

There are footways provided on both sides of Long Chaulden and The Avenue which provide connectivity to the wider network. The development proposals would include footway provisions to tie into the existing infrastructure.

There are currently no separate cycling provisions; however, the local highways are subject to speeds of 30mph and are wide with good visibility and are therefore considered generally suitable for cycling.

### *Travel Plan*

A Framework Travel Plan for the whole site and interim Travel Plan have been submitted for Phase 1. However, both documents only appear to cover the residential element of the development. Reference should be made to Appendix B of our guidance [www.hertfordshire.gov.uk/travelplans](http://www.hertfordshire.gov.uk/travelplans) which sets out the criteria for a Travel Plan. Based on the information provided in this application, the care home (if it is to be C2) will require a Full Travel Plan of its own and the convenience store (A1) will require a Travel Plan Statement. There will also be a requirement for the primary school to develop an appropriate School Travel Plan.

The Travel Plans submitted require some amendments. There is some clarification required in relation to when the baseline survey is planned for Phase 1 – 50% occupation or after occupation of 150<sup>th</sup> dwelling. In other places (p18 para 6.2) it says after 50 dwellings, but I assume this is a typo and means 50%.

Other comments are as follows:

### *Travel Plan Management*

- Travel Plan Co-Ordinator – contact details to be confirmed on appointment along with details of a secondary contact in case of personnel changes.
- Time allocated to role/frequency on site – an indication of time allocated to the role and frequency on site would be appropriate – this is a measure to demonstrate commitment to the implementation of the plan.
- Steering Group – a ‘working group’ is put forward but no mention is made of frequency of meetings and it appears to be intended only for the different Travel Plan Co-Ordinators to liaise. This group should be widened to include representatives of the different land uses on site. In this way, relevant parties can be actively engaged in the travel plan process which may give it better chance of success.

### *Measures*

- Measures put forward are appropriate although more could be included eg for walking and cycling - creation of on-site walking/cycling groups or information on local groups already in existence, information re cycle training and maintenance. Information provision is mentioned but not in great detail – eg needs to include provision of map of local amenities, map showing location of bus stops and routes to stops, timetable provision, information on ticketing offers. Car share – will this be promotion of regional providers? What about investigating the possibility for an on-site car share and provision of dedicated car share spaces?
- Travel Plans for the individual land uses should have measures appropriate to that particular land use, eg. the care home and convenience store could have measures that are rather different to the residential travel plan as places for employment.

### *Targets, Monitoring and Action Plan*

- We need confirmation of when the initial baseline survey will take place and therefore when modal shift targets will be confirmed – 50% occupation or after occupation of 150<sup>th</sup> dwelling. As the Phase 1 development is 350 units, 50% occupation would be after 175<sup>th</sup> dwelling was occupied.
- Given the size of this site, SAM standard monitoring should be used – please see [http://www.trics.org/why\\_monitor.aspx](http://www.trics.org/why_monitor.aspx). This is a method of monitoring ensures good quality data is obtained in a standardised way.

### *Construction*

A Construction Traffic Management Plan will be required to ensure construction vehicles will not have a detrimental impact on the highway in the vicinity of the site. A condition will be required to provide adequate parking for construction vehicles on-site to prevent on-street conflict and impacts to the highway safety. A Construction

Traffic Management Plan will be required for all phases of the construction, including demolition, excavation and construction of all elements of the building.

#### *Section 184 or 278 Agreement*

As changes to the public highway are proposed as part of the development, a Section 184 or 278 agreement, whichever is most appropriate, will need to be secured and approved with HCC. As part of the agreement, any proposals will be subject to detailed design review, road safety audits, and approval by HCC.

#### *Planning Obligations*

The Community Infrastructure Levy is a planning charge tool for local authorities to help deliver infrastructure to support the development of their area. Dacorum Borough Council has a Community Infrastructure Levy (CIL), under which this site is zero-rated.

Planning obligations have yet to be fully agreed but should include:

- Bus route subsidy
- Contribution towards off-site mitigation including filtered permeability to the SW of the site in the Winkwell area

A Travel Plan for each element of the development, consisting of a written agreement with the County Council setting out a scheme to encourage, regulate, and promote green travel measures for owners, occupiers, and visitors to the Development in accordance with the provisions of the County Council's 'Travel Plan Guidance for Business and Residential Development', which is subject to a sum of £6,000 per Travel Plan towards the County Council's costs of administering and monitoring the objectives of the Travel Plan and engaging in any Travel Plan Review.

#### *Summary*

HCC as highway authority recommends that the proposed development is approved subject to suitable planning conditions, off-site improvements and contributions toward highway and transport mitigation interventions.

#### **DBC Rights of Way Officer**

Site crossed by three existing public footpaths - Hemel Hempstead 91, 20 & 21 as per attached plan.

Clearly the level of development involved here is going to transform the area and change the nature of the 'experience' of users of these public rights of way.



Ironically the plan entitled ' Proposed Footway/Cycleway Provision' shows the proposed changes to paths 20 & 21 as creating a '2m leisure path' when, in fact, it is likely to become more of a commuter route rather than, what it is used as now, which is predominantly for leisure. Ideally much of the character of this path will be retained by retaining both hedgebanks and associated mature trees. The current width of HH20 is in excess of 2m so I take the reference to 2m to be for the width of proposed surfacing. We would want this to be the tarmac/sealed surface with PCC edging - this would need to be built to a high standard to resist tree root damage to path whilst not having a negative effect on the trees, some of which are covered by TPOs. It is likely that cycling will become an issue on this path and would suggest that we legitimise this by changing the 2m path for a 3m cycleway (minimum acceptable width) linking Fields End Lane (off phase 1 limits) to Long Chaulden.

Public footpath 21, Fields End Lane to fp20, is shown as another 2m leisure path - 2m tarmac path with PCC edging? That would be acceptable but we would want an overall width of 3m afforded to the PRow - a 50 cm buffer of natural surface/grass either side of the surfaced path.

Public footpath 91, Pouchen End Lane to Honeycross Road/Rowcroft, is shown as a '3m leisure path'. Again tarmac? Is that alluding to a cycleway? If so it will need to link to an existing highway capable of taking cyclists. At the eastern end (Honeycross/Rowcroft) an extension of the existing footpath will be required to achieve this. No structures, particularly stiles will be acceptable.

All the other footways shown are presumably going to be part of the adopted HCC highway network rather than PRow.

### **DBC Parks and Open Spaces**

The MUGA is a facility that is seriously lacking within the borough and is a great addition to this site. However I think it would be best if it was situated outside the school grounds, so that it is seen primarily as a community asset. The school would still have access to the facility, as the MUGA during the day would have limited use. This would also mean that kids using it would feel like they are not going to school, when they use it, which may sound trivial to us, but would mean a lot to certain users. I would expect the MUGA to have football goals, basketball hoops and if at all possible we need to think about netball, which is a sport often over looked and again Dacorum is lacking in any facilities for this sport.

Community growing area is a great idea, but it is kind of putting the cart before the horse, as there is no community yet, so how do we know what the community will want. The community when there is one may just want, a place to relax in the sun with plenty of nice seating sun shades etc. I think it would be a good idea, to save the space have DBC adopt it, with the intention of a community group/friends group being set up and then run with it from there. With maybe a 106 contribution to help them finance any ideas, which may well be a community garden.

Community orchards, take a lot of maintenance which if the community doesn't do it, the council end up maintaining, which we simply don't have the capacity for. The orchard seems to be pretty big and separates the open space into two areas. We have had in the past problems with ASB, with people throwing apples at passing vehicles. As mentioned the orchard is pretty extensive and I don't think even an active community group would be able to maintain such a large orchard. I think a better alternative would be to plant a few fruit trees in amongst a wildflower meadow. I think if a meadow was considered, it would need to be meadow turf and not seed, as seed is very hit and miss, we have had much better results using turf. Ecologically speaking a wildflower meadow would be far easier to maintain and would create a great area of biodiversity.

Fitness trail brilliant idea. I would half the equipment in the circuit and create a fitness hub in the central open space, and other areas. The equipment is much easier to maintain if it is gathered together. We have found that not everyone wants to run around a circuit to use outdoor gym equipment, they want to go to a central location and just pump iron!

### **DBC Conservation and Design**

We have reviewed the proposed built heritage aspects of the proposal and would comment as follows:

We agree with the list of receptors and do not have any further buildings to add or consider as part of this list.

There are two designated heritage assets.

*Pouchen End a grade II listed building.*

As noted in the statement there would be very little if any impact on the significance of this listed building. Therefore we would not object to the proposals. There would be some impact on the wider landscape in which the building sits but this would be considered to be nominal.

#### *Winkwell Conservation Area*

The major portion of the conservation area will not be impacted. There would be some slight impact from the northern area beyond the railway but we would consider this impact to be of a less than substantial and at a low level. There would be a change from a more rural area to that of an urban area beyond the immediate hedge and field. The planning officer should give this impact appropriate weight as per the guidance set out within the Framework.

#### *Non-Designated Heritage Assets*

There would be some minor impact on the setting of the stables and barns east of Pouchen End Lane. However we would agree with the impact stated within the report that this would be at a low level.

#### *Field Farm*

There would be some minor impact on the setting of Field End Farm however it would still be able to be understood within the surviving context. Therefore we believe this harm to be at a low level.

#### *Setting of Grand Union Canal*

There would be a nominal impact on the setting and significance of the Canal.

#### *Setting of West Coast Mainline*

There would be a limited impact on the setting of the asset. However we would agree with the report in that there has been substantial change to the asset over time and therefore we do not believe that a change to its setting would be detrimental to its significance in this instance.

Recommendation: We would consider that there may be some slightly different levels of harm to the setting of the Conservation Area and Field Farm however we would agree with the broad conclusions of the report that any harm is at the low end of the scale. As such the planning officer should undertake the balancing exercise but we would not object to the proposals.

## CPRE

### *General*

CPRE Herts strongly objected to the removal of the LA3 site from the Green Belt and the loss of open countryside. CPRE Herts has not been party to discussions on the masterplanning of the site. The site is now allocated and a masterplan, prepared by the developer, was approved in July 2017. The masterplan is a material planning consideration. While CPRE Herts much regrets the allocation, given the fact of development it also considers the details of the design, layout and relationship to Hemel Hempstead, countryside and nearby villages to be extremely important. CPRE Herts seek for the development to be designed to include priorities of:

Promoting access and enjoyment of the countryside by all

Exploiting landscape views from within the site for the enjoyment of the countryside by all

Delivering biodiversity gains and being sensitive to wider landscape impacts of development

Promoting walking and cycling on greenways away from polluting and noisy traffic routes

Achieving distinctive character and quality placemaking

### *Placemaking / Design Process*

As a key principle the development has to integrate, as fully as possible with the existing settlement and its wider surroundings to enable access and enjoyment of the wider countryside. This accords with NPPF para 118 which says planning decisions should:

“encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside”

The application has not, it seems, been referred to the Herts Design Review Panel. This is regrettable and encouraged to provide an added level of design scrutiny. This is important for such a major and significant expansion of the town. The NPPF (para 129) also supports the use of Design Review.

The site is particularly steep and the design of the scheme should be making careful use of this topography and also ensure that routes and gradients work well for internal cycling and walking paths.

Future adaptability of the buildings for a fully integrated mix of uses should be developed into the details. It isn't clear to what degree individual buildings will be able to adapt in the future to accommodate a greater mix of uses, for instance at ground floor level on busier primary routes or at connecting nodes. The future vitality and sustainability of new neighbourhoods will depend on their adaptability and self-sufficiency in local service provision. This can take time to evolve and should be provided for within the design.

#### *Pouchen End Lane and Chaulden Lane*

CPRE Herts has seen the submission (attached) by Bourne End Village Association (BEVA) for "filtered permeability". This would give priority to sustainable travel with partial closure of Pouchen End Lane and Chaulden Lane. This is a positive suggestion and its proposals are given full support by CPRE Herts. It would fully align with local and national policy direction. It accords with the local transport hierarchy of Herts CC Local Transport Plan 2017.

#### *Policy 1: Transport User Hierarchy*

To support the creation of built environments that encourage greater and safer use of sustainable transport modes, the county council will in the design of any scheme and development of any transport strategy consider in the following order:

- Opportunities to reduce travel demand and the need to travel
- Vulnerable road user needs (such as pedestrians and cyclists)
- Passenger transport user needs
- Powered two wheeler (mopeds and motorbikes) user needs
- Other motor vehicle user needs

The Dacorum Core Strategy 2013 sets out principles for LA3 which include:

Impact on the local road network mitigated through the promotion of sustainable travel options, including improved pedestrian links with adjoining areas.

No vehicular access from Pouchen End Lane.

The proposals of the Bourne End Village Association remove the hazards for pedestrians and cyclists as users of these narrow lanes, which are in any event quite popular for recreational use, but unsuited for two-way traffic especially at rush hours. Some inconvenience to commuting drivers may be experienced, but advantage is then given to sustainable modes and more will safely opt for walking and cycling as an option. The closures could link to the Chiltern Way which crosses the site. Routes can be extended to develop healthy walking and cycling activity between Potten End and Ashridge to the north and Hemel Hempstead Station and Town Centre to the south.

Filtered permeability has been applied in many urban situations to promote cycling and can also be in rural locations, see example from Netherlands. New development needs to promote access to the countryside and promote active travel for reasons of health, wellbeing, air quality, reduced congestion and to reduce Greenhouse Gas Emissions. The draft A414 Corridor Study promotes Hemel Hempstead as a Sustainable Travel Town. The Applicants Planning Statement (p31) aims to develop a network of pedestrian and cycling links but these are not carried through to routes that connect beyond the site boundaries. This is an advantage of the BEVA proposals.

The development should fully fund via a S106 obligation developing these walking and cycling routes and others beyond the site boundary. They are relatively low-cost measures that can deliver effective change directly related to the new development. If there were objections to the change then a trial period could easily be put in place to monitor the effects over a period of six to nine months to see what problems or adjustments need to be made. The routes should be integrated with the new development and route maps for new residents to show walking and cycling options shared in travel packs.

#### *Other detailed comments*

The hybrid application provides for a circuitous route for bus use. This of itself is questioned if it makes bus journeys or bus operation less attractive.

Open space in the development should come into full public use, preferably by public ownership and enjoyment for cyclists, joggers, dog walkers etc.

The open spaces should be integral to movement through the scheme and link across and beyond the site to the countryside and surrounding neighbourhoods

Key highway routes should be adopted to secure public access.

A framework of Rights of Way through and around the site should be safeguarded and extended to integrate the area with its surroundings and promote access and enjoyment of the countryside.

A full grid of connecting walking and cycling is required, not just occasional cross routes. The topography of the site should be used for distinctive design but also to enable walkers and cyclists to avoid unnecessary gradients. Routes that follow contours should be provided and attractive to use.

### *Summary*

CPRE Herts strongly objected to this site's development within the Dacorum Local Plan and the loss of Green Belt. The Masterplan has been agreed. The CPRE Herts would encourage Design Review of the scheme given the need for external scrutiny and to raise the quality of any development encroaching the open countryside. The development needs to proactively promote access to the countryside and as part of this CPRE Herts support the proposals and the opportunity of creating new active travel and recreational quietways on the narrow lanes that adjoin the site as promoted by the Bourne End Village Association within an extended rights of way framework.

### Additional Comments – (Following Re-consultation on TA Addendum)

CPRE Herts wrote on 6th March 2019 with respect to the above application and raised a number of points. The application is still under consideration. We recommended that Design Review should take place for such a significant scheme but this has not occurred.

CPRE Herts have seen the letter dated 30th August from the Bourne End Village Association (BEVA) to Herts County Council asking for more joined up thinking. We also viewed the applicant's latest Transport Assessment Addendum TAA and Draft Travel Plan (Charles and Associates) July 2019.

The latest applicant submissions make no commitment, assessment or priority to the suggested closure of Pouchen End Lane and Chaulden Lane. These routes are hazardous for walkers and cyclists and immediately adjacent to the proposed development. Without action the conflicts here will worsen, but the lanes also present an opportunity not to be overlooked. National and local policy support positive action. NPPF (para 84, 102, 108 and 130) asks for applications to support sustainable transport, promote walking and cycling, enhance the way places work and exploit local opportunities to achieve benefits. The Herts Local Plan Policy 1 sets out a clear hierarchy. The submitted TAA says the current plans link to existing paths but doesn't progress or adopt the ideas and the Draft Travel Plans contains no detailed proposals to show how walking and cycling will be promoted in these lanes.

Dacorum Council declared a Climate Emergency this July. This will require a plan and significant steps in a number of areas. Given that the transport sector is the UK's largest contributor to Greenhouse Gas emissions, and rising, then a well thought scheme to promote active travel, as in this case, is exactly the kind of planning that should be given priority.

It is feared that neither the applicant nor the County Highway Authority are giving this serious consideration. There cannot be a narrow focus on land within the site when impacts and opportunities to enhance active travel and safety for residents of the new development clearly exist beyond that red line area. For instance, footpaths FP91 and FP21 and the Grand Union Canal towpath which leads to Hemel Hempstead could all be linked up by a safe and attractive network of pedestrian / cycling routes. Forecasting is difficult but there is every good reason to expect that people would benefit from using the lanes as a safe and pleasant largely traffic free route. It would certainly soften the edge of the development against the countryside making it easier to cross.

We support the requests of the BEVA for joined up thinking on this. While it may be that some form of S106 contribution is being considered the applicant should submit, in liaison with County Highway Authority, a specific set of proposals to be adopted and funded as part of the grant of any planning permission at LA3. This should be delivered as soon as possible. It may be that a 6 month trial period – with minimal cost in terms of infrastructure can be implemented from the outset with funding for final landscaped works in the long term.

We would appreciate it if this letter could be referred to the applicant and County Highways and look forward to reassurance that the Pouchen End Lane and Chaulden Lane initiative will be taken up.

### **The Chiltern Society**

I am writing on behalf of the Chiltern Society. I am having to do this via an email as I am unable to access the consultation of the application. Please can you ensure that these comments are attributed to the Chiltern Society.

The Society acknowledges that it cannot object on the principle of development because the land has been taken out of the Green Belt already and was allocated in the Adopted Master Plan for Local Allocation LA3 which was adopted in July 2017 for 900 houses. However, there are numerous objections to the details of proposals, especially to the increase in number of dwellings, the consequences of which have



resulted in minimal provision for open spaces, biodiversity or landscape gain within the site.

The Key Development Principles required for the site outlined in the above document include:

- Soften views of housing from the countryside by use of tree planting, by retaining appropriate tree belts and by siting open space carefully (particularly for views from Little Heath and Westbrook Hay).
- Provide a soft edge to the countryside and ensure visual and physical separation from Potten End and Winkwell.
- New strategic landscaping to mitigate the impact on the Bulbourne Valley.
- Retain hedgerows and trees, and Use native species in planting schemes.

The proposal represents poor planning as pressure for more dwellings has outbalanced the requirement for environmental protection and enhancement. The current proposal pays little respect to the Council's Environmental Impact Assessment Chapter 6 Landscape Character and Visual Amenity, and the site certainly fails to incorporate any of the recommendations for Green Infrastructure (Policy CS26 Dacorum Council's Strategic Objectives). This policy requires the Green Infrastructure Network to be protected, extended and enhanced with the conservation and restoration of habitats and species and the strengthening of biodiversity corridors paramount. Given the amount of development, not only the increase in dwelling numbers but also the road network and community facilities, little land is left for this purpose.

The site is clearly visible from long distances and the proposals present a hard edge to the open countryside. The site abuts the Green Belt and clearly affects the setting of the Chilterns Area of Outstanding Natural Beauty which is a mere 0.8km to the west. It is essential that the overall plan for the site creates a clear and defensible boundary to the Green Belt, and to this end, structural landscaping along the western boundary adjacent to Pouchen End Lane must be provided. However, the plans appear to show development right up to the site boundary with no provision for this required substantial planting. The retention of the existing native trees and hedgerows together with additional planting within the site will, to some extent, reduce the impact on the wider countryside and views from the AONB, but this will require reduction in buildings.

Even the developer acknowledges that the proposals will have an indirect 'negative adverse' effect on the AONB. (para 6.7.2). It should be remembered that the AONB has the second highest level of landscape protection and great weight should be given to conserving and enhancing landscape and scenic beauty (NPPF para 172 and para 16.2 of Dacorum's Strategic Objectives).

The Council's own policy states in para 16.10 that 'Green Infrastructure brings a range of benefits acting as natural 'air conditioning', assisting with pollution control and food management, improving the health and well being of residents by providing space for leisure activities, reinforcing the character and identity of places, helping support renewable energy production as well as having a positive impact upon social interaction and property prices'.

However, this objective has been sacrificed by the considerable increase in the number of dwellings. The space for environmental enhancement on the boundaries and within the site has been severely compromised. eg. There is clearly an opportunity to enhance the Chiltern Way which crosses the site along the eastern boundary, which could provide not only a leisure facility for residents and visitors alike, but also provide an important wildlife corridor. However, this has been compromised by the provision of parking laybys within the open space. There must be provision for the extension and enhancement of Shrubhill Common Nature Reserve and wider green infrastructure links.

Since the Site Allocations were adopted considerable housing development has taken place elsewhere in the Borough which was not previously envisaged eg. on Maylands Industrial Estate. Therefore, it is questionable whether a further 200 dwellings are required for this site. The government is currently revisiting the calculations for housing numbers and therefore it is premature to assume that such a vast increase is necessary on this site especially as the plan clearly indicates a gross overdevelopment.

Therefore, it is clearly beneficial to reduce the number of houses to create a less dense and more sustainable development incorporating substantial environmental enhancements for the existing and new residents, the area as a whole and for the flora and fauna in and around the site.

For these reasons, the Chiltern Society strongly objects to the proposals as submitted.

#### Comments Following Re-consultation

The Society are disappointed to note that a number of the issues raised by us previously in responses to scoping opinions and consultations have not been addressed. In particular the revised figure of 900 to 1000 and then 1100 units reflects a rise of 22% density on the site. This has an impact on the ability of the development to provide substantial public amenity land and to space the units in a way which reflects the former green belt status of the land.

We agree with the comments from the Dacorum Environmental Forum and in particular in relation to points 1,2 and 3 of their submissions - the Chiltern Way

Wildlife Corridor should be enhanced as a wildlife corridor by including a strip to the west of the footpath to increase its width. This Way has been DBC's policy for many years and backed by Martin Hicks the HCC Environment Officer.

A binding commitment to fund the management of the wildlife corridor and the green areas should be obtained.

Looking at the plans, our calculation is that the removal of approx. 20 houses from the eastern boundary of Phase 1 and by pushing the road over would give the required width.

The plans show parking spaces along a strip in front of plots 60,61,69-75,151,152,168. We strongly believe these should be taken out of the green corridor and relocated by a reconfiguration of the plots to accommodate parking with the units and more garaging. Any surface car parking in the green corridor will create a negative impact that we believe is unnecessary. Again, a small reduction in the number of units being squashed onto the site will alleviate this impact. Plots 145-152 again show surface parking which should be removed and integrated into fewer units.

Encouraging use of public transport by subsidies on new bus routes serving the development would reduce the number of vehicle movements and possibly car ownership, and binding commitments to fund public transport should be obtained.

In conclusion, a reduction in the number of units and a greater emphasis on the Wildlife Corridor and green nature of the development will create a development which properly reflects the nature of the area and the land on which it is being built.

### **Dacorum Environmental Forum (DEF)**

(In summary)

DEF welcomes a number features in the recently released planning application, namely:

1. The retention of most of the existing hedgerows and trees;
2. A relatively high proportion of land not occupied by built infrastructure, and proposals for chalk grassland and other wildlife friendly features.
3. Proposals for the Sustainable Urban Drainage System (SUDS) designed to mitigate the changes to the water cycle which are inevitable as a consequence of changing the land use from farmland to urban.

However, DEF opposes granting planning permission unless the ideals of a Flagship Development can be achieved; detailed proposals for this are included under the

headings below. DEF is strongly of the opinion that this ideal will not be reached unless the following points are addressed:

1. The planning documents do not adequately distinguish between Public Open Space, and areas reserved for wildlife, such as Wildlife Corridors, or grassland sown with chalk grassland flower seeds.
2. It has been DBC's policy for many years, backed up by Martin Hicks (HCC environment advisor) that the best wildlife corridor to link Shrubhill Common LNR to the wider countryside is the line of the Chiltern Way public footpath. While the other retained hedgerows in the estate will have a conservation value, the Chiltern Way (effectively a double hedgerow) needs to be enhanced as a wildlife corridor by including a strip of land to the west of this footpath.
3. There needs to be binding agreement concerning management plans for wildlife areas, in particular the Wildlife Corridor for Shrubhill Common LNR.
4. Many opportunities to encourage wildlife in suburban landscapes at very little cost have not been included in the plans, and these should be implemented in line with the Letter 1 - see appended text, and the link in the Preamble - which DEF has already sent to Barratts.
5. There do not appear to be any proposals for housing to be "sustainable" or "zero carbon" in the true meaning of these words. Buildings should be built to the code 6 level, rather than minimum requirements.
6. As thermal insulation does not prevent all heat loss, to be "Zero Carbon" buildings must include active energy generation. Solar power (PV) generation is able to partly offset these losses, and is a tried and tested technology. All SW, S and SE facing buildings should be equipped with solar panels. The extra cost of this (and 5 above) could be borne by the purchaser, but in the light of the Government's policy to phase in electric cars we consider that this is a price that most purchasers would be willing to pay.
7. DEF notes that changes to the road layouts affected by LA3 are planned, but is concerned that despite the proposed increase in junction capacities the extra road traffic will cause considerable congestion at pinch points throughout Hemel Hempstead. This issue is being pursued more actively by the West Hemel Action Group.
8. There are no details of any bus services to the estate, except the current routes 3 and 4 that are of inadequate frequency.
9. The Application must demonstrate that throughflow and groundwater flow to the Shrubhill Common LNR will not be reduced.
10. The Application must demonstrate that water can be supplied to the proposed development without detriment to the flows in either the Gade or Bulbourne Valleys.

## Comments Following Re-consultation

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?}

## **WHAG**

Please find as follows comments from the West Hemel Action Group (WHAG), in response to the subject planning application for land at LA3, application reference - 4/03266/18/MFA. This should be considered as WHAG's initial & headline response to the subject Planning Application & further comments may be submitted by WHAG at a later date. It should be noted that we have been made aware by both James Doe & Ross Herbert of Dacorum Borough Council and also Councillor Fiona Guest, that further comments and feedback will be accepted and formally considered against this Planning Application, after the 15th February 2019.

We have provided comments against those key subject areas that we consider are significant in relation to the current planning application for land at LA3.

Housing numbers & Impact due to (~22%) increase in the number of dwellings

### *Numbers:*

The maximum of 900 dwellings stated in the Core Strategy, but the application now proposes 1,100 in a reduced area (HCC land excluded in these numbers, thus the final numbers will further increase), and not agreed at any level by Dacorum or its residents, making the green spaces and a soft edge to the green belt almost disappear with such high density development. At the Core Strategy, Site Allocations and Master Plan public consultations, residents have been consulted on 900 dwellings. At no previous stage have local residents been consulted on a higher figure. As a result previous consultations would be effectively voided if a higher number is now considered and agreed, residents having had no opportunity at any previous stage to consider a higher number.

### *Traffic:*

Previous traffic studies (Jacobs report) pointed for the original 900 dwellings, "We have run the 2031 scenario with full-demand i.e. with 100% of the expected trips. This scenario became very congested within both the AM and PM peak hours. As such, we were unable to complete model runs for either period. The full demand scenario has been discussed as far as possible but given the level of congestion and the curtailment of the model runs due to gridlock we feel that taking forward this scenario for further testing would be impracticable. On the basis of the modelled assumptions to date, this indicates that the current road network would be unable to

cope with the full level of proposed development.” The Planning Application with an increase of 22% on the 900 dwellings only indicates minor alterations to the existing road network. A clear case for gridlocking the already congested roads of Hemel Hempstead.

### *Eco-Housing:*

The Core Strategy committed to Sustainable housing (Sustainable Home code 6) including roof lines so that solar panels can be installed on the roofs with maximum effectiveness, the panels to be fitted by the developers to avoid the extra costs of retro-fitting, Installing charging points for electric cars at all houses with parking spaces, where possible use locally sourced and low carbon materials during the construction and incorporate District Heating, Combined Heating and Power, or Heat pumps in homes and community buildings, in line with the most efficient technology available at the time of construction. None of these are mentioned in the Planning Application.

The existing road infrastructure outside of LA3 will not cope with increase in traffic numbers for either 900 or especially 1,100 on already congested roads

Safety impact to existing residents due to the extra traffic – care needed to ensure that this is not compromised

Mitigations proposed by developers are inadequate based upon experience and also based upon the most recent traffic analysis being the Jacobs Report from several years ago. This latter indicated that at 100% based on the extra 900 houses in LA3 there would be gridlock in Hemel Hempstead and a reduction of 15% in traffic was required to allow the model to work. Rather than a reduction of 15%, LA3 is now proposed to have an extra 23% houses. The impact on Hemel will be significant. This does not appear to be recognised in the planning application.

The assumptions about increased traffic – number of cars, number and timing of extra journeys – need to be critically assessed. We not believe that these are correctly assessed at present.

The timing of the proposed changes to road layouts needs to be critically assessed to ensure the timing reflects the increasing traffic as the LA3 phases are delivered. We believe that these should be earlier than is proposed in the planning application to reflect the increased traffic flows, which, as stated above, we do not believe have been accurately assessed.

Without the community hub, school or GP surgery in phase 1, there will be extra traffic outside of LA3 in the earlier phases, which has not been taken into consideration.

The extra traffic generated down Chaulden Lane from the G&T site and servicing the Pumping Station will change the nature of that road, which is defined as a rural road.

This will be in conflict with DBC's own policy for not impacting rural roads and as restated by developers themselves in their planning application.

### *Negative Impact on Rural Roads*

WHAG is particularly concerned about the proposals in respect of the rural roads, notably Chaulden Lane, Pouchen End Lane and Winkwell.

The hitherto greenbelt area of LA3 has been declassified, on the strict understanding that there should be no further impact on the surrounding greenbelt with protection of the rural environment beyond.

However, we note:

An increase in the dwelling numbers of LA3 to 1100 plus, with no control over use of the rural roads, especially Pouchen End Lane/Winkwell, as a "rat run"

Proposals to widen rural Chaulden Lane

We strongly object to the above for reasons detailed below.

WHAG supports the suggestions made in the Design & Access statement to encourage pedestrian and cycle access from LA3 to Pouchen End Lane, via green corridors, but contend that this is simply not possible on grounds of safety, without traffic control measures to limit car usage.

In an additional point of note WHAG considers a cohesive approach is required to review the impact of all developments planned on the local roads. In particular, the 56 dwelling development in Pix Farm Lane will increase the traffic through the rural roads described here.

### *Chaulden Lane*

The eastern end of Chaulden Lane (by the houses and playing fields) is a two way highway, but it is narrow. Where cars are parked only single lane traffic can pass. Houses are cut into the slope meaning that driveways exit directly into the road with poor visibility, and an increase in traffic will render negotiation onto the road even more dangerous than it is now.

More notably however, the western part of Chaulden Lane, from the houses to Pouchen End Lane, is a narrow, winding, single track rural lane. At the junction with Pouchen End Lane, a hill further reduces visibility and ability to pass. Traffic must take care to avoid collision and often is prevented in its progress due to the single track nature. The road is particularly unsuitable for heavy vehicles.

Moreover it is especially dangerous to pedestrians/dog walkers and cyclists, who can be pushed into edge/undergrowth to evade collision with a vehicle. This is further exacerbated by the steep banks on the northern edge of this lane. An added issue is

the proximity of the railway to the south, with a busy train network causing significant noise affecting pedestrians ability to hear approaching traffic.

Hence any plan that may increase the level of traffic should be avoided.

We note the plan to widen Chaulden Lane but consider this to be an insult to the local community, by further impacting on the rural area outside of the actual development itself which has already resulted in loss of green belt. WHAG considers this proposal is against national and local strategy regarding rural roads.

Hertfordshire Highways have stated:

‘Chaulden Lane is definitely rural in character west of number 167 (just outside the speed limit change). It is narrow (one vehicle wide) with no footways and heavy undergrowth/ hedge on both sides.....’

The Stomor report ‘Means of Access and Transport Appraisal’ opines:

‘Chaulden Lane is “Country Lane” in nature, and is not considered suitable for vehicular access to the site. This road is narrow, has poor visibility and no associated footways where it abuts the site’

‘It would be possible to form an exit from the site to Chaulden Lane, which would enable pedestrians or cyclists to use this road to gain access to the hamlet, Grand Union Canal and the A4251’

Further references are detailed below.

### *Pouchen End Lane and Winkwell*

Pouchen End Lane and Winkwell are again single track, very rural roads that are only suitable for a low volume of smaller vehicles accessing houses and facilities. Pouchen End Lane has particularly poor visibility, due to the high banks on either side as the road winds through.

Notably at Winkwell, access is via the delightful and old swing bridge with a 3 tonne weight limit, and a small bridge over the River Bulbourne. The swing bridge is obviously important and functional – in summer months it is frequently used by long boats causing further delays to local traffic, with a build up waiting on either side until the bridge reopens.

Residents and visitors to the area enjoy walking and cycling along these routes and their safety must be paramount. Dog walkers frequently complain about being pinned against the edge to enable a vehicle to pass.

There is a large car park on Pouchen End Lane opposite the junction with Pix Farm Lane. This is used by walkers and fishermen, as well as visitors to the boat yard and Three Horseshoes pub. The pub is extremely popular and frequented by many. The

walk from the car park to the pub, even at the present time, can be concerning as traffic tries to wend its way through and navigate on-coming vehicles.

To the south where Pouchen End Lane joins the London Road (A4251) congestion already causes a dangerous situation with traffic reversing onto London Road to clear on-coming vehicles. There are a very limited number of passing spaces which work reasonably well with low volume traffic and local drivers who understand “the etiquette” – not “rat runners” who are not familiar. Accidents have occurred and any proposal that might exacerbate this should be avoided.

The current situation is that a combination of Pouchen End Lane, Winkwell, Chaulden Lane and/or Pix Farm Lane are used as a “rat run” for traffic from the London Road/A41 through to Hemel Hempstead and from the north via Field End Lane down Pouchen End Lane. This is increased significantly when there are problems on major roads such as the junction at Box Lane and London Road and also when the A41 is closed due to an accident (a regular occurrence).

This “rat run” traffic can be fast and dangerous and frequently causes congestion and blockages, especially around Winkwell and the swing bridge. “Road rage” is not uncommon as drivers appear to be unable to work out who should move aside to let on-coming traffic through.

WHAG also draws attention to the Pix Farm Lane development which will lead to additional pedestrians and cyclists (including children) using Pouchen End Lane and Winkwell to access London Road, bus stops and the station. There will be an increase in pedestrian and cycling activity – which is to be welcomed as long as it is safe.

WHAG additionally contends, for all the reasons expressed above, that Chaulden Lane is not in any way suitable for construction traffic. It goes without saying that neither is Pouchen End Lane / Winkwell, and this should include construction workers access to work vehicles.

WHAG notes the county council statement that it will develop and maintain strategies for roads within the urban and inter urban network that:

“D On Rural Local Distributor and Access Roads: - Deter through traffic including rat running from using these roads; - Resist developments which would generate an unacceptable change in the amount or type of traffic.”

Hertfordshire County Council Transport Policy Document states (3.8G) The County Council will resist development where:

The proposals would increase the risk of accidents or endanger the safety of road or rights of way users. Such risk exists at the present time and would be exacerbated by any increase in traffic.

The proposals would cause or add significantly to road congestion, especially at peak travel times. Road congestion, especially at peak times, occurs now.

The proposals would generate a significant change in the amount or type of traffic using local or rural roads or rights of way. Without controls the volume of traffic

using the lanes as a “rat run” would undoubtedly increase, especially from those wishing to access the north of LA3 via Field End Lane and Pouchen End Lane. The location of the Foul Water pumping station and Travellers site will generate large vehicles not suitable for rural lanes.

The proposals would either significantly affect the rural or residential character of a road or right of way, or would significantly affect safety on rural or local roads or rights of way especially amongst vulnerable users, or would be located by a poorly designed road. This would undoubtedly be the case.

In terms of Road Hierarchy and Network Development (3.20) it is stated that developments on Rural Local Distributor and Access Roads which would generate a change in the amount or type of traffic will be resisted in the following circumstances:

Where there is an increased risk of accidents;

Where the road is poor in terms of width, alignment and/or structural condition;

Where increased traffic would have an adverse effect on the local environment either to the rural character of the road or residential properties alongside it.

All of the above are applicable to the rural lanes bordering LA3 to the west and south.

Additionally at 3.21 we are informed that the county council’s approach to rural transport policy, takes into account most recent Government guidance on rural issues which encompasses key themes including to “improve rural road safety”; reduce the impact of traffic in rural areas and encourage cycling and walking.” i.e. not to implement strategies that will have a negative effect on rural road safety by increasing traffic (either in volume or size).

At 3.25, under the subject of Sustainable Distribution and Freight, the strategy is to “Resist applications for new operators licences involving property served off the rural road network.” How, therefore can this be reconciled with the provision of HGV licenses to service a Foul Water Drainage plant and a G&T site? WHAG contends that it cannot.

In summary,

WHAG objects to any proposals that impact on the safety of walkers, cyclists and the local community, who use the rural roads to access houses and local facilities

WHAG objects to any proposals that exist to alter rural nature of the rural roads

WHAG is supportive of proposals to reduce traffic, thus improving safety for non car driving road users

WHAG is supportive of proposals to reduce traffic, thus improving access and functionality for local vehicle road users

Further references include:

Policy CS2(B) criteria includes the need to:

Respect local character and landscape context

The Master Plan includes the requirement to:

Ensure no vehicular access from Pouchen End Lane – however without controls Pouchen End Lane can be accessed from the north and London Road

Reinforce and enhance the existing structural landscape features adjoining Pouchen End Lane to enable a new, clear and defensible Green Belt boundary to be defined and to reduce further the limited views of the development from the west – what good is this if traffic in the rural roads is increased causing danger and congestion

Prevent further access onto rural lanes

Protect the amenities and character of Pouchen End Hamlet

Maintain the rural character of Pouchen End Lane and Chaulden Lane

#### *Proposed Gypsy & Traveller Site*

Reference is made to the October 2016 Planning Inspection on Site Allocations and its acceptance of the strategic principle of housing numbers, including G&T sites, as opposed to the planning detail. The April 2017 Site Allocations Main Modifications Report of Representations, MM21, states clearly that “Detailed site issues will be considered through the planning application process”. Therefore, many of the concerns raised historically are now germane.

As shown below, the developers’ ‘Planning Statement’ (clause 7.47) that “This masterplan has been produced with reference to relevant Government guidance in the form of Designing Gypsy and Traveller Sites – Good Practice Guide” is fallacious. Further, the developers’ response to issues raised in their Statement of Community Engagement’ (p15) is nebulous: A footpath through the barricades does not constitute integration. Conversely, locating the sewage pumping station adjacent to the G&T site can only be interpreted as a highly offensive statement as to the social standing of gypsies and travellers.

The siting and design of the proposed G&T site does not accord with national or local policy as follows:

PLANNING POLICY FOR TRAVELLER SITES (DCLG, AUGUST 2015):

POLICY A - Using evidence, 7 a) Pay particular attention to early and effective community engagement with both settled and traveller communities

COMMENT: While the 2006 and 2008 consultations were supported with a detailed report, the CS/LA3 consultation has been generic; with the “potential location” for the

traveller site now being presented as a foregone conclusion without any apparent design or sustainability review (DBC Council meeting – January 2016 – Minutes p8, quoting question by Leo Bedford (WHAG) and reply by Andrew Williams:

“The location of the Gypsy and Traveller site within the LA3 sites will however be a matter for the independent Inspector to consider when he examines the Council’s Site Allocations document.

The independent inspector DID NOT consider the location of the G&T site within LA3, merely the principle of housing needs within the overall Site Allocations

Policy B - Plan Making, 10 a) Identify and update annually, a supply of specific deliverable sites

COMMENT : No update since 2008, providing no ‘proportionate evidence’ in favour of the Traveller sites on LA3 nor options should a compliant location on LA3 not be deliverable. This is delinquent on the part of DBC.

POLICY B - Plan Making 10 b) Identify a supply of specific, developable sites or broad locations for growth

COMMENT: The 2008 study provides a dated but detailed appraisal by comparison to the broad proposals in the LAs

POLICY B - Plan Making 10 c) Consider production of joint development plans that set targets on a cross-authority basis

COMMENT: Not seen

POLICY B - Plan Making 10 d) Relate the number of pitches or plots to the surrounding population

COMMENT: As currently proposed, the hamlet of Winkwell is the relevant population

POLICY B – Plan Making 13 Ensure that sites are sustainable economically, socially and environmentally

COMMENTS (including those relevant to the Good Practice Guidance cited by the developers):

The proposed site is marginalised at the lowest most South Westerly corner of the site, with main egress South away from the main development and minimal physical linkages to the main site and amenities.

It is the furthest point from local services; as the crow flies 600m uphill on foot and a circuitous route of 2.7km via the minor road and already strained infrastructure of Chaulden Lane, a “Rural Lane” (see also comments on lack of compliance with Rural Roads policy)

The proposed site is only 600 metres from an A41 junction but only via minor rural roads with specific weight and width constraints; in particular, over canal bridges



which are notorious bottle necks including the unreliable swing bridge which is narrow and has a weight limit

The proposed site seems designed to turn its back on the community and vice versa.

The location is too far to walk (especially if in need of healthcare) and the lack of internal road linkages necessitate a circuitous drive.

There is no convenient bus route

The London – Manchester mainline is less than 100m away from the proposed site, a significant health & safety and environmental (noise) risk

The site as proposed is exposed to the prevailing wind from the SW

POLICY C – Sites in Rural Areas, 14 Local authorities should ensure that the scale of such sites does not dominate the nearest settled community.

COMMENT Given the “potential site” and orientation, the nearest community is the hamlet of Winkwell; the 6 residential properties will be dominated by 7 traveller pitches.

POLICY E: Traveller Sites in Green Belt, 17 Green belt boundaries should be altered only in exceptional circumstances.

COMMENT: The failure to deliver compliant G&T facilities undermines any exceptional circumstances used to justify the alteration of the green belt boundary under the Site Allocations.

DACORUM ‘CORE STRATEGY’ , 2013

POLICY CS22, New Sites will be:

(b) Located close to facilities

COMMENT: The proposed site is the furthest point from local services in LA3; as the crow flies 600m uphill on foot. The location is too far to walk (especially if in need of healthcare or carrying shopping) There is no planned bus route. The lack of internal road linkage means the alternative is circuitous route of 2.7km via the minor road and already strained infrastructure of Chaulden Lane, a “Rural Lane” (see also comments on lack of compliance with Rural Roads policy)

(e) designed to a high standard with: (i) an open frontage similar to other forms of housing; and (ii) landscaping or other physical features to provide an appropriate setting and relationship to existing residential areas.

COMMENT: The developer proposals provide for a segregated laager, akin to apartheid, do not meet these standards in any way.

POLICY CS22 Any new transit pitches should also:

(a) achieve good access to the M1 or A41 main roads; (

COMMENT: The proposed site may only be only 600 metres from an A41 junction but only via minor rural roads with specific weight and width constraints; in particular over canal bridges which are notorious bottle necks including the unreliable swing bridge which is narrow and has a weight limit

b) minimise potential disturbance to adjoining occupiers.

COMMENT As currently proposed, the hamlet of Winkwell is the relevant population which will be dominated by the presence of the G&T site.

Laager = An encampment formed by a circle of wagons. An entrenched position or viewpoint that is defended against opponents

Amenities for Phase 1 and future phases of development, e.g. Retail, GP Surgery, School, Care Home

There is nothing included in Phase 1 other than housing, therefore how will existing retail amenities outside of LA3 cope with 350 houses in Phase 1 when they are already unable to cope with existing people and vehicle traffic flow. An already dangerous situation develops daily at the Warners End, Stoneycroft shops, with traffic backed up along Long Chaulden Road blocking one side of this road due to access issues to the existing shopping area.

What will be the timing of new amenities compared to the development of Phase 1? Phase 1 will generate 350 new properties, therefore in excess of double that number in terms of new residents over a number of years, including children and older residents. Existing local schools and GP surgeries are already over-subscribed. Where will new Phase 1 LA3 residents seek school places or medical facilities if nothing is provided within LA3 as part of Phase 1.

Commitment MUST be provided that facilities and amenities, including a GP surgery, school & shops are built as part of Phase 1 and not deferred to a later date or Phase, the timing of which we have no current view of and therefore could be many years in the future.

HCC Land in the southeast corner, below the site identified in the planning application

WHAG is concerned about the piece of land owned by Herts County Council (known to residents as the "Horses' Field") as follows:

Why is this not included in the Outline Plan?

In the DBC Core Strategy, the Site Allocations DPD (as adopted 12 July 2017) and the Master Plan document, this land was considered part of the LA3 Site Allocation (see SADPD Site Allocations Map Book GB/3 – LA3, also p 86 Local Allocation LA3 West Hemel Hempstead.) Plan 2 of the Master Plan area shows the HCC field and is announced in para 3.1 of the Master Plan.

This field formed part of the area of land which was considered suitable for the provision of up to 900 new dwellings.

Now this land is omitted from the planning application, yet still the number of houses has risen to 1,100.

When this land is eventually built on the total number of houses will well exceed the 1,100 now proposed by the developers in this current application.

This in turn would exacerbate all of the issues mentioned above, including transport, pressure on school places, on access to health care.

Another issue has always been access to this site. It must be made clear that any access should be through the LA3 site and not along the existing narrow and congested Chaulden road.

#### Comments Following Re-consultation

WHAG is replying to the latest consultation on LA3 [application reference 4/03266/18/MFA]. WHAG commented on the original consultation via our planning consultant, as well as subsequent consultations (please refer to these previous formal responses). In this we raised a number of issues, relating to the impact of the development both on existing neighbouring residents and future residents of LA3:

1. Procedural Issues associated with the application
2. Principle of Development
3. The Quantum of proposed development
4. Highway Impacts
5. Scale of Development
6. Affordable Housing
7. Community facilities
8. Gypsy and traveller Site Provision
9. Delivery

We are disappointed that the latest set of documents do not provide any further information that helps to address any of these issues in line with our original submission.

We note that Herts CC Highways has now responded to a previous consultation recommending refusal of the application on the grounds that several of the changes proposed to junctions are not appropriate/in line with policy. WHAG supports and welcomes this intervention.

However, it is disappointing to note that the HCC Highways response does not cover Chaulden Lane which it is proposed to widen in places to accommodate heavier/longer/ additional vehicles that will result from the proposed new access to the Gypsy and Travellers' site and the foul pumping station. We have commented previously that there had been no previous mention of an access to the G&T site prior to the application being submitted and the resulting widening of Chaulden Lane would appear to be against Herts Highways own policy of preserving the character and nature of the county's rural roads. We would argue that access to the Gypsy and Travellers' site must be through the main LA3 site in accordance with the allocation documents and masterplan. The provision of integral access to all parts of LA3 (as opposed to separating parts of the site from one another), would assist integrating all future residents of the site as one community, as required by national policy. This would avoid the need to change Chaulden Lane as part of the rural environment, enhancing safety, for the betterment of pedestrians and cyclists (as required by the Core Strategy and Master Plan).

To re-iterate, WHAG strongly objects to any action that will detract from the established rural character of Chaulden Lane as a country lane, and considers DBC Planning should reject the proposals regarding Chaulden Lane which will seriously impact on the safety of all users of this lane, with a knock on effect to Winkwell and Pouchen End Lane.

In addition, issues associated with the delivery of affordable housing in accordance with the description of development are again side stepped and no answers are provided in respect of how the scheme will deliver 40% affordable housing when phase 1 is failing to deliver such levels. This is particularly concerning especially in the context of 7.21 of the planning statement, which indicates that the provision is subject to viability considerations. However, no such viability information is provided at this stage to justify anything other than delivery of 40% affordable housing.

In terms of infrastructure and the impact of the proposed development on the existing community the new information is conspicuously silent on the provision and phasing of infrastructure in terms of education, medical and community facilities.

Finally, we note the planning statement now includes a breakdown of the proposed housing tenure and size mix. We note the inconsistency between the proposed mix and the findings of the SHMA with the proposal weighted heavily toward 4 and 5-bedroom houses compared to the more balanced approach of the SHMA. In that respect we note that over half of the open market housing units are 4 and 5+ bedroom houses.

As a general observation it appears to us that the applicant has failed to have regard to the matters raised at our liaison meeting and it is disappointing to note the failure to properly engage with the community and yet the process continues.

### **DBC – Waste and Refuse**

From a waste collection perspective more detailed information would be required about access and waste storage at different types of residencies however the waste stratagy should be consulted.

Houses should have space to store 3 x wheeled bins and a food caddy and a similar space to present them outside their boundary nerest to the road that the collection vehicle collects from on collection day.

Dependant on the type of flats they can share 1 x 1100ltr eurobin between 6 residenceis, the same again for recycling and 1 x 240ltr wheeled bin for food waste.

Commercial properties should each have sufficient space to store at least 2 x 1100ltr eurobins and a 240ltr wheeled bin for food waste. This should be seperate to any domestic storage area.

Access is required for a 26t ridged freighter for domestic collections and up to 32t for commercial.

Where eurobins are used to contain waste there should be no steps beween the storage area and the collection vehicle

### **Bourne End Village Association (BEVA)**

For some time now we have been discussing the traffic problems at Winkwell both within the village and with Richard Roberts and Nick Gough. We have now put together proposals which we have submitted to Odette Carter at HCC. One particularly interesting aspect of these proposals is the considerable improvement in the environment surrounding both LA3 and the Buttons redevelopment. Rat runs would become safe walking and cycling areas giving access to the train station and canal.

Do please give it you careful consideration.

#### *Traffic at Winkwell and the Local Rural Lanes*

For some time, Bourne End Village Association (BEVA) has expressed concerns regarding rural lanes in the vicinity of Bourne End.

Increasingly, the lanes in this area are being used as 'rat runs' from the western side of Hemel Hempstead to the A41 intersection at Bourne End. This situation is only likely to worsen with the coming developments, as discussed below.

We would like you to consider a proposal, which we believe would ameliorate the problem, improve road safety, support alternative modes of transport in line with Hertfordshire County Council Transport Plan and is actionable at minimal cost.

### *Proposal*

The two rural lanes (Chaulden Lane and Pouchen End Lane) blocked off to through traffic.

### *Background*

Expansion of Hemel Hempstead westerly has led to increased traffic flow in the rural lanes of Chaulden Lane and Pouchen End Lane as a route to the A41 intersection at Bourne End. Both these lanes are single track with no footpaths and steep banks at various points. The lanes converge into Winkwell via a single-track road under a railway bridge, meeting the A251 by passing over a single lane canal swing bridge. The points at which these rural roads cross the railway canal were designed to suit traffic in the early 19<sup>th</sup> century.

At various points along this route there is no room for both car and pedestrian to pass. Pedestrians are often unable to safely move away from the traffic. In other areas, pedestrians are unable to hear approaching traffic due to noise from passing trains. Given the volume and nature of the traffic, which is largely commuter, these situations present a serious safety hazard.

Recent proposals for local development in the area have the potential to exacerbate the problem, considerably raising potential safety issues to an intolerable level. Our proposal aims to mitigate these problems and support alternative modes of transport.

### *Increasing Pressure*

The LA3 development will lead to an additional 900 to 1200 homes which will result in increased traffic in the area. Chaulden Lane and Pouchen End Lane from the southern and western boundaries to the development.

It has been acknowledged that the lanes are unsuitable as access points for the development (LA3 Master Plan, Stomer Report) and there are concerns about the pressure on the main access points (Jacobs Scenario Testing). There will inevitably be spill-over into these lanes from the development, as many motorists will favour these routes for access to and from the A41. The planning appears to show no mechanism for restricting flow along these lanes.

Additional traffic pressure is also coming from a second development in the area, plans for which are out for consultation now (4/02061/18/MFA). This second development involves the redevelopment of a former industrial estate into 56 new homes. Again, it is widely acknowledged that this development will also increase the traffic through Winkwell.

### *Changing requirements for access to the area*

Previously, BEVA had not pressed for road closures along these lanes, as it was understood that the nature of the 'Buttons' business required access for large earth moving equipment which could only happen via Chaulden Lane.

As this business is now moving away with the redevelopment of the site, the business requirement for access is also disappearing; changing the requirements of the area.

### *Overall Improvement*

The developers of the 'Buttons' site have highlighted the proposed provision of a footpath along Pix Farm Lane to encourage pedestrian access to public bus services on the A4251. In the current situation, this merely serves to increase the risk to pedestrians when they enter Winkwell with the increase in both pedestrian and vehicular traffic.

Our proposal, apart from the safety aspect, would mean that both Chaulden Lane and Pouchen End Lane would become more attractive and accessible to pedestrians and cyclists alike; from both the existing housing, new developments and more widely those enjoying the country lanes for outdoor activities.

Access from both LA3 and the proposed development in Pix Farm Lane, to the railway station would become a pleasant cycle ride or walk along the canal towpath. Access to the amenity of the canal and local historic public house at Winkwell and others in Bourne End would become a leisurely stroll. Our proposals would considerably enhance the attractiveness to potential residents of the housing in both of these developments.

### *Wider Support*

We have discussed the matter with our local county councillor, Richard Roberts and Nick Gough of Hertfordshire Highways who has visited the site with us. Both acknowledge the problem and have expressed support for our proposals.

### *In Conclusion*

We appreciate that the initial reaction may be one of dismissal, however, we face very real and mounting safety concerns around traffic in the area. We can either accept the current transport infrastructure design of the 19<sup>th</sup> century and wait for the accidents and mounting congestion (which is already seen on a daily basis at the swing bridge), or alternatively, we can pro-actively give meaning to the aspirations of HCC Highways by ensuring the safety of pedestrians and cyclists through demonstrably dramatically reducing the risks they face in accessing public transport. But the benefits to future residents go far beyond this in ensuring a safe rural environment, friendly to the needs of all.

## Comments Following Re-consultation

### *Rural road safety in Bourne End*

We note the most recent updates on the planning portal. We wish to express our concern that yet again there appears to be no reference the traffic in the lanes surrounding Bourne End. These concerns have been expressed on numerous occasions including our initial response to the LA3 plans, at a meeting with Nick Gough, a meeting with the developers in May and subsequent correspondence.

In summary, our concerns relate to the existing problem of safety in the lanes and congestion and safety at Winkwell. Both Chaulden Lane and Pouchen End Lane are used as rat runs to access the A41 via the A4251. Given that the bulk of traffic currently emanates from Chaulden and Warners End area and that LA3 exits are in this area it is inconceivable that there will not be a significant impact. With no remediation, the situation will become severe. Highways are failing in their statutory duty to assess and ensure mitigation of impact of LA3 to the lanes.

We note the statements in the Highways report expressing concern at the potential for congestion at various junctions in town. These support analysis in the Jacobs report. It is inevitably that more traffic will be driven through the existing rat runs. The proposal to widen Chaulden Lane (albeit by improving passing places) will increase the potential for volume and speed of traffic leading to a decrease in safety for pedestrians, cyclists and the occasional horse. The proposal seems quite extraordinary given HCC policy on rural roads and the commitment to protect the rural roads in Dacorum's LA3 Master Plan.

But it is the issue of safety that concerns us most.

In their report, Highways makes reference to developments which impact on the LA3 development. In this, the 56 houses in Pix Farm Lane are noted. This development will generate pedestrians and cyclists accessing the public transport on the A4251. This public transport includes school buses, buses to Watford, Berkhamsted and Hamel Hempstead. This pedestrian route will also serve the traveller site and eventually residents in the southern area of LA3.

The route to public transport will present a severe risk. In addition to being the only pedestrian route for residents at the Pix Farm Lane development it will be also be the route for residents at the traveller site and those from the southern part of LA3.

We see no acknowledgement of this problem. There is reference to an ATC in Pouchen End Lane but silence over Chaulden Lane and Winkwell.

We ask that this matter is addressed with urgency.



### *Continuing issues of exclusion of the traveller site at LA3*

We are commenting on the most recent documents to be submitted regarding the LA3 development.

We have written separately regarding the traffic issues. We here concentrate on those pertaining to the traveller site access.

The traveller site is part of the overall plan. It is its integral relationship to the rest of development that legitimised removal of the land from the green belt. Yet there is scant reference to it in any of the documentation.

1. There is no reference to the traveller site in the Urban Design Framework.
2. There is concern over noise in the southern area of the development. This is addressed in terms of house construction. No reference is made to the impact on the travellers.
3. The LEAP is at the furthest point from the traveller site. This creates yet another sense of exclusion.
4. We have raised the more general question of traffic as referred to above. In addition, no mention is made of pedestrians. Both HCC and DBC have failed to answer the question of access to school for traveller children. We believe that this will be Pixies Hill School and this will require walking along Chaulden Lane. One hopes nobody would be promoting walking for smaller children in Chaulden Lane to get to Pixies Hill School.

The following points (5 and 6) are common to all those who will occupy the southern edge of the development.

5. Chaulden Lane is regarded as a pedestrian and cycle route to access the railway station via Old Fishery Lane.
6. No bus routes are planned for the southern part of the development. Both in the initial stages and on completion, the closest bus routes to Watford, Berkhamsted and Aylesbury etc. will be via Winkwell.

Our views of the exclusion of the traveller site from LA3 have been seen as a matter of opinion. Combining the access issues and the points made above, it is quite clear that planners have taken little if any notice of either government or local policy.

### **Councillor Allen**

#### *Boxmoor Submission for LA3*

As Borough Councillor for Boxmoor, I have grave concerns about the scale of the LA3 development. This is on three levels:

- 1) The impact this development will have on traffic flows and pedestrian safety beyond the development
- 2) The importance of infrastructure being completed in the first phase in mitigating the environmental impact of the development
- 3) The precedent set in terms of open space and housing density and the impact of this on future developments in Hemel Hempstead

## *TRANSPORT*

The independent transport report undertaken by Jacobs in 2015 highlighted that the surrounding road system was not able to cater for the increased traffic from LA3 and recommended a reduction of 15% to the 900 houses being planned. Rather than a reduction, the development is now 1100 houses. There are no indications that car ownership and usage patterns have changed in recent years and so, one can infer that the pressures anticipated by the Jacobs report will be even greater. If Jacobs felt that the additional traffic created by 765 houses could be accommodated by existing roads, then the proposed development will increase the pressure on roads by 44% beyond what Jacobs considered to be the capacity of the surrounding road structure.

Boxmoor already experiences a number of traffic pressures at peak hours on St Johns Road, Station Road and Fishery Road. Increasingly Boxmoor residents complain about the volume and speed of cars travelling through the 'village'. In particular, Fishery Road, Green End Road and St Johns Road can be perilous to cross, especially with children. As a key route into Hemel and to the Station, Boxmoor also experiences pressure from commuters parking in various locations in the area. Unless measures are put in place to mitigate against this extra pressure, these will only get worse.

The traveller site proposed for Chaulden Lane is also a cause for concern. This lane is already very busy at peak times and also with people parking at the weekend for Camelot rugby club. The swing bridge at Winkwell and the lane connecting it to Bourne End are now notorious bottlenecks which at times can lead to tailbacks to the A41 slip roads. Not only will the large lorries and mobile homes accessing the development from Chaulden Lane add extra traffic pressure, but the size of the vehicles that will be channelled into these lanes are inconsistent with the County Council's policies of protecting rural roads. The Department for Communities and Local Government's Planning Policy for Traveller Sites specifically mentions avoiding undue pressure on infrastructure (Policy B 13f) and locating sites where there is mixed residential and business use (Policy F 18). These considerations have been overlooked

## *INFRASTRUCTURE*

One of the key lessons of developments the world over is that if you do not have infrastructure in place when the new residents settle, then they will establish unhelpful patterns of transport. Innumerable studies show that the frequency of

buses and the distance that people have to walk to a bus stop are key factors in determining whether public transport solutions are used instead of private cars. Also essential for people to develop environmentally-friendly transport habits, it is important to have a network of cycle paths in the area. The current plans only show cycle paths that serve to get residents into the countryside or out of the estate. It is imperative that infrastructure is put in place in phase one to ensure that the development does not fall into a number of traps, including:

- a) If there is not sufficient capacity in the local doctor's surgery, then residents will need to travel further afield to other surgeries
- b) If there is not a local primary school, residents with primary age children will be likely to use schools further afield. Whilst there may be places at schools nearby (Micklem and Chaulden), if these are not of a quality parents desire, they are likely to seek places in higher performing schools in the wider area.
- c) If there is not an efficient and regular bus service with a bus stop nearby to be able to get to Hemel town centre, the station or the nearest supermarkets, then people will use their cars.
- d) If there is not an effective, safe cycle route to Hemel town centre and the station, then people are less likely to be persuaded to use more environmentally-friendly means of transport.

### *DENSITY*

The density of the development and its increase to 1100 units has led to the reduction of amenity space and the narrowing of green corridors into mere slithers of open space. This is a pale imitation of the Jellicoe vision for Hemel Hempstead that the Borough Council states it is intent on maintaining in the current plans for expanding the town. Hemel Hempstead residents often hold up the amenity community spaces and the spacious green corridors as much-valued assets to living in the town. Erosion of the Jellicoe vision so that community hubs and green corridors are scaled down and possibly tokenistic will undermine local confidence in the up and coming Hemel Garden Villages development. It is important that Hemel residents are brought along on this journey by seeing that current developments are sensitive to such issues.

Therefore, it is important that the following modifications are implemented:

- 1) The scale of the development is reduced to enable wider green corridors, more amenity space and less pressure on infrastructure
- 2) The suitability of the development is reconsidered for a Gypsy and Traveller site
- 3) The bus service is invested in to ensure it provides an efficient and regular service to both the Town Centre, the Railway Station and the nearest supermarkets
- 4) Bus stops are introduced in the heart of the new development in phase 1 so that residents in the new development see it as 'their' bus service, rather than one designed for Warners End and Chaulden

- 5) There are cycle paths to the railway station (via Long Chaulden/Northridge Way and Old Fishery Lane and linked to the canal?) and the town centre (using the paved over verges of Warners End Road?)
- 6) A pedestrian crossing on Fishery Road to ensure pedestrian safety when the traffic gets even heavier (the plans look at pedestrian safety on Northridge Way and the station where there are already pedestrian crossings and neglects Fishery Road)
- 7) Traffic calming and pedestrian crossings on other roads used as rat runs through Boxmoor, such as the Beechfield Road end of St Johns Road, Gravel Hill Terrace and Green End Road.

**HCC – Growth and Infrastructure**

I refer to the above mentioned development application (4/03266/18/2253/MFA - Land at West Hemel Hempstead LA3) and the planning obligations sought towards education, childcare, library, youth and waste services to minimise the impact of development on Hertfordshire County Council Services for the local community.

We note that this a hybrid application, of which a full application has been submitted for 350 dwellings and the remaining 750 dwellings have been submitted in outline, with all matters reserved except for access.

This site falls into one for the CIL rated £0 areas of Dacorum Borough Council’s CIL Charging Schedule. Accordingly, planning obligations in their restricted form are the only route to address the impact of this development.

HCC’s standard approach is to request a table (setting out the contribution figures by type, size and tenure of individual dwelling) is referred to and included within any Section 106 (index linked as specified). This approach provides the certainty of identified contribution figures with the flexibility for an applicant/developer to amend the dwelling mix if required and the financial contribution to be calculated accordingly. This ensures the contributions remain appropriate to the development and thereby meet the third test of Regulation 122 of the Community Infrastructure Levy Regulations 2010: “fairly and reasonably related in scale and kind to the development”.

For reference the contributions are based on the following indicative development mix and trajectory that was confirmed in August 2019:

<b>HOUSES</b>		
Number of bedrooms	A) Open Market and Intermediate	B) Affordable Rent

1	0	0	
2	125	108	
3	246	31	
4+	421	0	
<b>Total</b>	<b>792</b>	<b>139</b>	<b>931</b>

<b>FLATS</b>			
Number of bedrooms	A) Open Market and Intermediate	B) Affordable Rent	
1	4	32	
2	28	105	
3	0	0	
<b>Total</b>	<b>32</b>	<b>137</b>	<b>169</b>

Year	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	TOTAL
<b>Number of Completions</b>	110	110	110	110	110	110	110	110	110	110	<b>1100</b>

Although the likely levels of contributions have been provided in this email it is important to note that these are only indicative figures. Therefore HCC require mechanisms to be included in the legal agreement such that if the number and mix of dwellings was to change (e.g. at the Reserved Matters stage) then the level of contribution could easily be recalculated and without the need to enter into a Deed of Variation.

In order to facilitate this and enable a formulaic approach to be applied the contributions for Childcare, Youth facilities and Library facilities have been set out by type, tenure and size of dwellings (in the form of Table 2 of the HCC Toolkit) see Table 2 below.

Based on the information to date for the development we would seek the following financial contributions from the 1100 dwellings towards the following projects.

### *Primary Education*

As part of the development of the Dacorum Local Plan the West Hemel Hempstead LA3 development was always envisaged as needing to provide a new 2FE primary school. This requirement is included within Policy LA3 West Hemel Hempstead as set out within Dacorum Borough Council's Site Allocations DPD which was adopted on 12th July 2017. Hertfordshire County Councils (HCC) strategy is that this primary school will help mitigate the primary-aged children arising from this 1,100 dwellings development. Based on the level of primary pupil yield which has been modelled to

arise from this development a financial contribution (and land of sufficient size) is sought towards a new on-site primary school. HCC's standard land specification is attached to this email.

Using the HCC Development Model HCC have modelled the potential pupil yield arising from the 1,100 dwellings, based on the housing mix provided. This shows a peak primary yield of circa 2.7FE, based on assumptions informed by the applicant, regarding when these dwellings are anticipated to be completed and occupied. The yield is likely to be over 2 FE for 9 years.

1. The provision of additional capacity at existing local school(s) to meet demand from the development, prior to the opening of the new school. Feasibility work is required to establish how best to provide the extra accommodation and determine the necessary contributions, but a current estimate for a cladded, double modular unit is a **£300,000** (costs and indexation to be confirmed). With the passage of time it is possible that this additional capacity may need to be re-provided on the new school site to help provide for the peak yield (see item 3 below).
2. The total cost for a new 2FE primary school (with nursery class) is **£8,900,000** (costs based on 1Q2019, BCIS All in TPI, indexation to be applied).
- 3.

Based on estimated build cost for the new school

£250K prior to Commencement towards feasibility work

£250K 12 months after Commencement for preconstruction costs

Of remainder 40% upon transfer of site

Of remainder 60% Prior to occupation of 330<sup>th</sup> dwelling

1. Following establishment of the new school a financial contribution estimated at **£600,000** (indexation to be confirmed) to provide further additional capacity to accommodate any peak yield above 2FE. This additional capacity is likely to be in the form of modular buildings. HCC's demographic model indicates that yield is likely to exceed 2FE for 9 years. Financial contributions will therefore be sought to meet this additional demand, likely on the new school site. HCC suggests a trigger in the S106 agreement to set out a future review mechanism and to draw down the necessary funding. HCC would need to articulate the level of need and the resultant requirements for additional accommodation. The current trajectory indicates peak demand in year 2032, so if demand has not exceeded 2FE 3 years after that date (it should be noted that this is based on the current build trajectory), HCC agrees that no additional contribution would be sought.

### *Childcare*

In addition to Nursery (free early education) provision which will be operated as part of the Primary School, a day care nursery is proposed as part of this development which will be placed in the community hub, to the north east of the Primary school. The estimated set-up costs for equipment to facilitate the operation of a 60 place on-site nursery/crèche is circa £50,000 (index linking required). Further quantification of this element will be required within the S106 negotiation or as an alternative the HCC Toolkit contribution of £153,204 will be required (index linked to PUBSEC 175).

### *Youth Service*

Amount to be calculated based on the Table above (index linked to PUBSEC 175) to be used towards the refurbishment of the XC Centre, Jarmans Park, Hemel Hempstead. This is to install a training kitchen, in order to help young people to develop their independent living skills and resilience, as well as towards outreach work in the local area.

The indicative level of contributions towards Youth provision which HCC would be seeking from this development for 1,100 dwellings are **£51,685**.

Based on Table 2 of the HCC Toolkit (index linked to PUBSEC 175)  
Instalments on commencement of each Phase  
Phasing Plan to be included within S106

### *Library Provision*

A financial contribution is sought towards library provision based on the table below (index linked to PUBSEC 175). This would be used to review and reconfigure the layout of Hemel Hempstead Library in order to increase stock capacity through the purchase of additional materials in order to meet the additional demands that will be made on the service by this size of development.

The indicative level of contributions towards Library provision which HCC would be seeking from this development are **£196,148** These are based on the HCC Toolkit costs and index linked to PUBSEC 175.

Contributions arising from the care home element (70 units in total) are **£5,390** (calculated on the basis of each unit being treated as a one-bedroom market flat).

The total amount to be sought is therefore **£201,538**.

Based on Table 2 of the HCC Toolkit (index linked to PUBSEC 175)  
Instalments on commencement of each Phase  
Phasing Plan to be included within S106

## **Fire and Rescue Services**

The Fire and Rescue Service would urge and encourage the installation of residential sprinkler systems to reduce the impact of this development on both the residents and the increase in calls that will come from a development of this size.

Based on the information provided to date we would seek the provision of fire hydrant(s), as set out within HCC's Planning Obligations Toolkit.

All dwellings must be adequately served by fire hydrants in the event of fire. The County Council as the Statutory Fire Authority has a duty to ensure fire-fighting facilities are provided on new developments. HCC therefore seek the provision of hydrants by the developer, through standard clauses set out in a legal agreement. If the developer does not provide hydrants where necessary (and this is a matter which is not considered until a more detailed design stage), the responsibility and cost would fall upon the County Council. Accordingly the provision of fire hydrants is sought from this proposal.

In addition, buildings fitted with fire mains must have a suitable hydrant provided and sited within 18m of the hard-standing facility provided for the fire service pumping appliance.

Paragraph 6.1(c), of BS 5588-5 2004 states that every building needs to have a suitable hydrant:

- . not more than 60m from an entry to any building on the site;
- . not more than 120m apart;
- . preferably immediately adjacent to roadways or hard-standing facilities provided for fire service appliances; and
- . not less than 6m from the building or risk so that they remain usable during a fire (generally a water supply capable of providing a minimum of 1500 litres per minute at all times should be provided).

The provision of public fire hydrants is not covered by Building Regulations 2010 (Part B5 as supported by Secretary of State Guidance 'Approved Document B').

The requirements for fire hydrant provision are set out with the Toolkit at paragraph 12.33 and 12.34 (page 22). In practice, the number and location of hydrants is determined at the time the water services for the development are planned in detail



and the layout of the development is known, which is usually after planning permission is granted. If, at the water scheme design stage, adequate hydrants are already available no extra hydrants will be needed.

The CIL Regulations discourage the use of formulae to calculate contributions however; the County Council is not in a position to adopt a CIL charge itself. Accordingly, in areas where a CIL charge has not been introduced to date, planning obligations in their restricted form are the only route to address the impact of a development. In instances where a development is not large enough to require on site provision but is large enough to generate an impact on a particular service, an evidenced mechanism is needed to form the basis of any planning obligation sought. HCC views the calculations and figures set out within the Toolkit as appropriate base costs for the obligations sought in this instance.

HCC's standard approach is to request Table 2 of the Toolkit (below) is referred to and included within any Section 106 deed. This approach provides the certainty of identified contribution figures with the flexibility for an applicant/developer to amend the dwelling mix at a later stage and the financial contribution to be calculated accordingly. This ensures the contributions remain appropriate to the development and thereby meet the third test of Regulation 122 of the Community Infrastructure Levy Regulations 2010: "fairly and reasonably related in scale and kind to the development".

**Table 2: Hertfordshire County Council Services planning obligations contributions table**

Bedroom s*	1	2	3	4	5+	1	2	3
		<b>HOUSES</b>					<b>FLATS</b>	
	<b>Market &amp; other</b>					<b>Market &amp; other</b>		
Childcare	£1 4	£6 4	£1 38	£1 99	£2 44	£8	£5 7	£89
Youth facilities	£6	£1 6	£5 0	£8 2	£1 05	£3	£1 3	£41
Library facilities	£9 8	£1 47	£1 98	£2 41	£2 65	£7 7	£1 29	£164
	<b>HOUSES</b>					<b>FLATS</b>		
	<b>Social Rent</b>					<b>Social Rent</b>		
Childcare	£1 2	£1 21	£1 88	£2 26	£2 77	£4	£6 5	£113

Youth facilities	£2	£8	£3 1	£5 1	£5 5	£1	£6	£21
Library facilities	£4 8	£9 1	£1 30	£1 56	£1 55	£3 8	£8 2	£107

\*uses an assumed relationship between bedrooms and habitable rooms

All figures are subject to indexation and will be indexed using the PUBSEC index base figure 175

Please note that current service information for the local area may change over time and projects to improve capacity may evolve. This may potentially mean a contribution towards other services could be required at the time any application is received in respect of this site.

### *Justification*

Unless stated otherwise, the above figures have been calculated using the amounts and approach set out within the Planning Obligations Guidance - Toolkit for Hertfordshire (Hertfordshire County Council's requirements) document, which was approved by Hertfordshire County Council's Cabinet Panel on 21 January 2008 and is available via the following link: [www.hertsdirect.org/planningobligationstoolkit](http://www.hertsdirect.org/planningobligationstoolkit)

Fire hydrant provision based on the approach set out within the Planning Obligations Guidance - Toolkit for Hertfordshire (Hertfordshire County Council's requirements) document, which was approved by Hertfordshire County Council's Cabinet Panel on 21 January 2008 and is available via the following link: [www.hertsdirect.org/planningobligationstoolkit](http://www.hertsdirect.org/planningobligationstoolkit)

The County Council seeks fire hydrant provisions for public adoptable fire hydrants and not private fire hydrants. Such hydrants are generally not within the building site and are not covered by Part B5 of the Building Regulations 2010 as supported by Secretary of State Guidance "Approved Document B".

In respect of Regulation 122 of the CIL Regulations 2010 the planning obligations sought from this proposal are:

*(i) Necessary to make the development acceptable in planning terms.*

Recognition that contributions should be made to mitigate the impact of development are set out in planning related policy documents. The NPPF states "Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Conditions cannot be used cover the payment of financial contributions to mitigate the impact of a development (Circular 11/95: Use of conditions in planning permission, paragraph 83). In addition, for education requirements, paragraph 72 of Section 8 of the NPPF states "The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new

communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education."

The development plan background supports the provision of planning contributions. The provision of community facilities is a matter that is relevant to planning. The contributions sought will ensure that additional needs brought on by the development are met.

All developments must be adequately served by fire hydrants in the event of fire. The County Council as the Statutory Fire Authority has a duty to ensure firefighting facilities are provided on new developments. The requirements for fire hydrant provision are set out with the Toolkit at paragraph 12.33 and 12.34 (page 22).

*(ii) Directly related to the development;*

The occupiers of new residential developments will have an additional impact upon local services. The financial contributions sought towards the above services are based on the size, type and tenure of the individual dwellings comprising this development following consultation with the Service providers and will only be used towards services and facilities serving the locality of the proposed development and therefore, for the benefit of the development's occupants.

Only those fire hydrants required to provide the necessary water supplies for firefighting purposes to serve the proposed development are sought to be provided by the developer. The location and number of fire hydrants sought will be directly linked to the water scheme designed for this proposal.

*(iii) Fairly and reasonably related in scale and kind to the development.*

The above financial contributions have been calculated according to the size, type and tenure of each individual dwelling comprising the proposed development (based on the person yield).

Only those fire hydrants required to provide the necessary water supplies for firefighting purposes to serve the proposed development are sought to be provided by the developer. The location and number of fire hydrants sought will be directly linked to the water scheme designed for this proposal.

I would be grateful if you would keep me informed about the progress of this application so that either instruction for a planning obligation can be given promptly if your authority is minded to grant consent or, in the event of an appeal, information can be submitted in support of the requested financial contributions and provisions.

I trust the above is of assistance. However, please let me know if you have any questions or require clarification on any points.

## Appendix B

### Public Consultation

A pre-application consultation exhibition took place on 6 February 2017 at John F Kennedy Catholic High School, with representatives of the Applicant present in order to assist members of the public and elected Members of the Council who were in attendance. This event was publicised by the circulation of 2,215 newsletters to houses in the locality of the site. Those who did attend were given until 13 February 2017 in order to submit their comments on the proposals, but could also do this at the event itself.

260 members of the public signed in to register their attendance and 65 feedback forms were received, either at the venue, or later via post. The key concerns raised are as follows:

- transport concerns;
- gypsy and traveller issues;
- housing numbers; and
- provision of local services.

The detail of these concerns and the Applicant's response to them are stated within the accompanying Statement of Community Engagement, which was submitted in support of the application. They are also addressed in the considerations section of this report with reference to the above concerns.

A further public consultation event took place on 27 June 2017 at the same location. This was again publicised by the circulation of newsletters to the same residents previously targeted. The number of attendees was reduced from the first event at 108 and 28 feedback forms were received. Issues raised remained largely constant as traffic and the gypsy and traveller site were most frequently raised. Again the Applicant's response to these concerns is detailed within the Statement of Community Engagement and addressed later in this report.

As part of the public consultation process, and in addition to public exhibitions, the Applicants set up a consultation website at [www.westhemel.co.uk](http://www.westhemel.co.uk) supported by a free phone number for information. The website contained information and plans explaining the proposals as well as an electronic feedback form. The website was visited by 1,200 people.

The Applicants have taken on board the comments received during the public consultation process and, where possible, amended the scheme to address these concerns.

A summary of the applicant's responses to concerns raised as part of the public consultation process is set out below, as drawn from the Statement of Community Engagement.

*Traffic congestion especially in the local roads*

The biggest concern by far that residents had with the proposals for West Hemel has been the impact that it would have on local roads. Many felt the existing road network would be incapable of coping with the increase of vehicles.

*Applicants response:*

Detailed traffic surveys have been conducted on local roads relating to their capacity to deal with additional traffic levels. A series of improvements will be made to local roads to improve traffic flow to ensure that local roads can adequately handle the increased number of vehicles. Improvements will be made to Long Chaulden, Warners End, Leighton Buzzard Road, Northridge Way and Fisheries Road to cope with the additional traffic levels. We have also submitted a further Transport Assessment to show how the increased traffic levels will be managed.

*West Hemel would increase the strain on local services such as the GP surgery and local schools*

Some residents have raised concerns about new residents at West Hemel increasing the strain on local services such as the NHS and local schools

*Applicants response:*

The West Hemel development will fund additional capacity in the local doctors services which will either be provided as part of the community hub, or as a new addition to the existing doctors surgery. A new two form entry primary school will be built in West Hemel to serve the needs of West Hemel and also alleviate the pressure on existing local schools. In addition to this our proposals for West Hemel will see new investment in local secondary schools as well as services such as increasing the frequency of local buses, investing in additional library provision and working with utilities such as water and electricity.

*The site is liable to flood*

Some local residents have commented that the site has previously flooded, and were concerned about this occurring in the future.

*Applicants response:*

A thorough drainage and flooding assessment has been undertaken, which has created a robust Sustainable Drainage System designed to retain water on-site and percolate back into watercourses in a way which mimics the existing greenfield run off rates. The water will be stored in surface balancing ponds and oversized underground pipes, allowing significant capacity without exacerbating existing issues.

*The gypsy & traveller site is not an inclusive part of the development*

Following the first exhibition some residents said that the new development would exclude the gypsy and travellers site, and that its location would mean that it would be cut off from the new facilities being provided by the development.

*Applicants response:*

Following on from the concerns raised after the first exhibition we have altered the landscaping around the gypsy and traveller's site to make it more open and allow easier access to the development. The site will have its own access from Chaulden Lane and will provide 7 semi-permanent pitches for the gypsy and travelling community. We will be working with officers to ensure that the site is integrated into the proposals development and that it is designed to be delivered early and meet the need for such sites across the borough. We will therefore review connections to the site during the early stages of construction.

*The increase in the housing number*

Residents have been concerned about the rise in the number of homes from 900 to 1,100, with many viewing this number as being unsustainable on the site.

*Applicants response:*

The number of new homes has been set based on detailed technical studies undertaken by the team which have clarified the amount of land that can be developed on the West Hemel site. The work has identified land which is suitable for homes which wasn't in the original LA3 Masterplan calculation. This means that the density of the development will remain the same but carry a larger number of housing due to having a larger area of land to develop. The Planning Inspector has confirmed that the number suggested in the LA3 Masterplan is not a maximum level and that the figure of 900 was a conservative estimate regarding the total number of dwellings the site was capable of accommodating.

*Wildlife habitats & greenspace*

Some residents have been concerned about the loss of green space, and the impact that West Hemel would have on wildlife habitats.

*Applicants response:*

West Hemel has been designed to retain existing trees and hedgerows as well as creating new wildlife areas such as meadows and woodland. These areas form corridors through the development and link into the wider countryside and Hemel Hempstead. West Hemel will also create play areas such as a children's trim trail as well as opportunities for a community orchard. These landscaping proposals have been worked up to a greater

level of detail and sought to maximise the width of these corridors and ensure that native planting creates a rich and varied habitat.

## **Neighbour notification/site notice responses**

### **Objections**

#### **Neighbour 1**

##### **OBJECTION**

I would firstly like to say how dismayed that the Green Belt land In Hemel Hempstead could have ever been considered being built on. The impact of LA3 and other proposed ventures will be horrendous, leaving Dacorum, especially West Hemel gridlocked and like a 'concrete jungle'.

I strongly object to increase in the original numbers of proposed properties on LA3 and look to you for confirmation that the parcel of land owned by HCC on Chaulden Lane will not be used for residential properties in the future.

I would also seek answers as to why there should be any access into the rural road Chaulden Lane - emergency access or by the proposed Gypsy and Traveller site - this is a rural road and already a 'rat race'. Indeed having a pumping station in that area is completely inappropriate, unsafe and it is against your own policy!

The Gypsy and Travellers site is positioned to exclude social inclusion and would be difficult to police. It is against the 2015 National Policy and they should not be given priority access onto Chaulden Lane, thereby creating safety issues with large caravans and lorries.

I understand the first phase is to be for 350 houses with no GP surgery, school, shop, etc. As local residents already know, it is difficult to access a doctor now and this will impact enormously. When more houses are built, where will they park and how will the roads surrounding cope with these additional numbers which are already excessively busy? Pollution caused by these developments is not good for residents welfare.

I am sorry to say that I think Hemel Hempstead is becoming a mess. I feel it is becoming a dumping ground whereas other areas in Dacorum are unaffected. It is time for a good look into the future of the madness you are creating.

## **Neighbour 2**

### OBJECTION

Comments: I wish to OBJECT to this planning application for the following reasons:

#### General Comments -

- I have not been notified by the planning authority by post, email or observed any notices on lamp posts as to this application. It has been poorly publicised and it appears not to comply with the council's own statement of community involvement. Therefore this application should be re advertised and the consultation extended.
- The application is misleading suggesting a modest development of around 350 properties but in actual fact includes a clause to build over a 1100 residential properties, schools, lakes, traveller sites, doctors, shops etc etc.
- The application is on green belt land and no reason has been provided to justify the need to build on it.
- The Councils own Authority Monitoring Report for 2016-17 states targets for building of residential dwellings have been exceeded so there is no demonstrable need to such a large development.
- The Core Strategy Documents produced by Dacorum BC are out of date and not a true reflection on the needs of the community. Therefore if the assessment tool used to determine the application are out of date how can the application be considered?
- The Local Plan 1991 -2006 adopted in 2004 are similarly out of date and not a true reflection on the needs of community. Therefore if the assessment tool used to determine the application are out of date how can the application be considered?
- The Local Allocation Plan 3 appears to have been produced in conjunction with the developer (in fact their logos adorn the front cover). This is anticompetitive and suggest that the application will not be judged fairly and upon their merits. The LA3 Plan should be rewritten by another local authority to ensure transparency going forward.
- Several other areas of land in Dacorum are more suitable for development.
- The development reduces the availability of arable land for farming and food production.
- The local community does not want the development.
- The access provision is very poor.
- The development proposes community improvements for the new properties but nothing is proposed to offset the misery the existing residents will be required to suffer during the building and post construction.



- The development is a significant burden on the local community.
- The use of Community Infrastructure Levy needs to be considered by DBC to offset their additional costs.

1) Reviewing the document entitled Phase I and II Geo-Environmental Site Investigation, Land West of Hemel Hempstead, October 2016 1CO101380p2r1:

a) It states that a search for historical landfill sites has been carried out by contacting the Environment Agency. It should be noted that the Environment Agency does not hold ALL the records of historical landfill sites and in many cases Hertfordshire County Council will have been the waste regulation authority for sites that were operated before 1995. This failure to check records accurately means it is not possible to confirm if historical waste deposits are in place. In addition given the proposed development area is adjacent to several farms it is important to carry out a detailed site investigation to ensure that farming waste, not subject controlled waste legislation until recently, is present. As the applicant has not provided all the necessary information or taken due diligence to prepare an accurate application then the application should be refused.

b) The presence of solution features in the chalk is a cause for concern. The solution features are where the chalk strata is subject to dissolving over geological timescales. As the chalk dissolves the overlying soils, sands etc collapse into the void space. This "solution feature" if not correctly identified, remediated will pose a risk of subsidence for any properties built over the top of them. A full site investigation should be carried out using cone penetrometers and a treatment plan put forward to ensure the solution features which the report accepts are in the area are remediated. Until a suitable site investigation and treatment strategy is proposed then it is not possible to assess the risk accurately and the application should be refused.

c) The presence of made ground found during the intrusive site investigation suggests that waste has been deposited in some areas of the proposed site but no effort has been made to determine the type and scale of the waste deposits in the area. It should be noted that the excavation and re-deposition of the made ground will require an Environmental Permit from the Environment Agency.

d) The commentary on ground anomalies can only be taken to confirm the points raised in b) above. Therefore once again until a suitable site investigation and treatment strategy is proposed then it is not possible to assess the risk accurately and the application should be refused.

e)The statements on groundwater monitoring suggesting that groundwater levels were low at the times of the monitoring suggest that the report has not developed an accurate picture of the hydrogeology under the site so it does call into question the assumptions that have been made in the rest of the document. It is not clear if the report has looked at any BGS data in the local area to determine historical ground water levels in the area. Collecting historical data would provide a more complete data set for making any groundwater assumptions in the rest of the document. The applicant has not taken care to provide accurate information and is using only very limited and as it admits in it's own reports, unusual data due to extreme dry weather the application should be refused.

f)The presence of a high pressure gas line under the site is noted but we are not aware of what mitigation is proposed by the developer to reduce the risk of damaging the pipeline during the construction phases or long term controls that are proposed to ensure future property owners do not damage the high pressure pipeline in subsequent years. The use of S106 power to prevent new structures being put up or excavations greater than 30cm should be considered for areas either side of the gas pipeline. Hemel Hempstead has already suffered from the largest explosion since WWII so taking some small steps to mitigate the risks in the long term would be prudent.

g) Soakaway drainage will exacerbate the generation of new solution features across the site and increase the risk of subsidence across the site. The proposals should not have any soakways in order to prevent this risk. We note the presence of made ground has been identified so the installation of soakways into made ground may mobilise any contamination contained within them. For this additional reasons soakways should not be permitted on the site. As this will leave the proposed area without suitable drainage this is in contrary to Planning Policy CS29 on 'Sustainable Design and Construction' so the application should be refused.

2) When reviewing the document "APPENDIX 4.1: Formal EIA Scoping Opinion Report and DBC Formal EIA Scoping Opinion"

a) we note that the developer is proposing to use a CEMP (assumed to be a Construction Emission Management Plan). It goes on at point 1.122 to state that "a visual examination will be used to monitor whether unacceptable levels of airborne dust are travelling beyond the boundary". As the principle components of dust that are harmful to human health are PM10 and PM2.5 and are not visible to the naked eye then this control measure is entirely ineffective. Given the close proximity to sensitive receptors adjacent to the property and sensitive receptors on the site as development is underway, we suggest the council impose conditions to require comprehensive ambient air monitoring for PM10 and PM2.5 around the site perimeter using a reference or continuous indicative monitor with a limit of 75ug/m<sup>3</sup> average over a 5 minute period to comply with government Air Quality Management

Standards for PM10. This is in accordance with the planning guidance issued by the GLA and Institute of Air Quality Management. As the application does not protect human health, the environment or comply with UK Air Quality Standards then the application should be refused.

b) we note a rather dismissive statement at point 1.1.24 suggesting all air quality impacts will be determined but it fails to provide any meaningful detail on how this will be done. Therefore as the application does not protect human health, the environment or comply with UK Air Quality Standards then the application should be refused.

c) We note that according to the document; "2015 Updating and Screening Assessment for Dacorum Borough Council in fulfillment of Part IV of the Environment Act 1990 - Local Air Quality Management dated July 2018" that there is no monitoring of nitrogen dioxide levels or PM10 or PM2.5 in the west of Hemel Hempstead. It appears that no monitoring has been conducted in this area or adjacent to the roads that the developer proposes to access the land. Therefore even if the developer did determine the air quality that they fail to provide details on in point b) above, they cannot accurately determine if the levels are currently giving cause for concern (ie exceeding the Government's Air Quality Standards) or will do in the future. It should be noted that any attempts to model the levels of air pollution without detailed pre-existing information would be viewed as misleading. In order to overcome this the developer should install a network of diffusion tubes around the site, on the proposed access roads and on property to the North East before the development is given consent to ensure it is not contributing to exceedances of the Government's Air Quality Standards. Clear limits should be agreed before the development can proceed and monitoring should continue during and after the construction (at the developers cost) to ensure the limits are followed. Therefore as the application does not protect human health, the environment or comply with UK Air Quality Standards then the application should be refused.

d) We note that M-EC Acousticair referred to in the document "Environmental Statement, Land at West Hemel, BDW Trading Ltd (Barratt David Wilson), Taylor Wimpey UK Ltd, Stimpsons and Bletsoes" are predominantly technical experts in noise and vibration but they do not seem to be as well regarded for air quality impacts following a quick search on the internet. No detail is provided of the actual qualification of the staff carry out the noise and air quality work where as other areas of expertise the staff are named and their qualifications and experience are defined. Has a less qualified and experienced officer carried out this work? As this information is missing it is not possible to determine the information that been provided by the applicant as being accurate and therefore this application should be refused.

### 3) Footpaths -

We note that according to the definitive map - footpath 90, 91 and 21 are adjacent to the proposal site. Access routes to the site that have been proposed by the developer will cross several of these footpath with busy roads. These footpaths are well used and enjoyed by the local community. They are a wildlife corridor and need to be protected. It is not clear what the developer proposes to protect these footpaths and wildlife corridors.

Planning Policy CS29 on 'Sustainable Design and Construction', states that,

- "New development will comply with the highest standards of sustainable design and construction possible. With regard to floodrisk and drainage, the following principles should normally be satisfied:

? Provide an adequate means of water supply, surface water and foul drainage;

? Minimise impacts on biodiversity and incorporate positive measures to support wildlife;

? Minimise impermeable surfaces around the curtilage of buildings and in new street design"

Unfortunately the proposals will inevitably impact on biodiversity as the footpaths will be surrounded on houses on either side and they will cease to be wildlife corridors. They will also reduce the local wildlife value significantly and diversity. In order to overcome this the developer should be asked to provide a significant buffer around the footpaths to maintain their amenity and wildlife value. As this has not been provided the application should be refused.

### 4) Community Value

We note the proposals include an offer to provide some community facilities. It is not clear if the developer is required to provide these or if they "may" include them as part of the proposals. We would appreciate clarity on this important point. The community infrastructure is already at breaking point with local shops at Stoneycroft and Long Chaulden already beyond capacity. The proposed development should not add additional burden on these community areas as their isn't sufficient capacity. In order to overcome this the development must have it's own community shopping area provided BEFORE the housing is constructed to minimise the impact on the Stoneycroft and Long Chaulden Areas. As the proposal will place local community facilities under additional strain the application should be refused.

### 5) Access

We have concerns over the use of The Avenue to access the proposal area. The Avenue is already congested with car parking due to insufficient parking provision on

the adjacent roads and properties. Additional traffic on this road accessing the proposed development will cause significant and ongoing congestion which is compounded in winter months as the road is effectively single lane due to icy road conditions on adjacent roads, forcing residents to park cars all along The Avenue. In addition the additional traffic will have a significant amenity impact in the form of additional noise, vibration, poor air quality. The strength of feeling in the local community on this issues is very high and the developer should take note. We propose that proposed point of access to the development via The Avenue is downgraded to an Emergency Access only with gates secured by fire brigade keys. As the application will cause noise, vibration, poor air quality, congestion to communities adjacent to the access points and no mitigation has been proposed then the application should be refused.

## 6) Drainage -

### a) Foul Sewerage Water

It is particularly concerning to note in the "Preliminary Foul Drainage Strategy" the comments from Thames Water who have stated "that the existing sewerage networks adjacent to the site do not have sufficient capacity to cater for the full development beyond 100 units." It goes on to state "A number of drainage options were discussed with Thames Water for providing both network and treatment capacity for the development beyond these 100 units. These are summarised below;

- Upgrade existing downstream sewerage networks to Maple Lodge STW.
- Provide a separate dedicated connection from the development to Berkhamsted STW and provide upgraded treatment facilities.
- Provide a hybrid system utilising existing capacity in the Maple Lodge networks for early development phases with later phases taken to Berkhamsted.

To address this Thames Water appear to be planning to expand their network to cope with 329 properties by 2028 but the proposed in this planning application are for at least 1100 properties. Even with the a significant improvement to capacity at the Berkhamstead WWTW their still is a shortfall and a total lack of headroom at the WWTW. It should be noted that Thames Water have only confirmed they have no concerns about the proposals for 100 additional units to their sewer system. We feel that the developer should bear the cost of the proposed 1.96km new sewer that is required to connect the proposed development up to the Berkhamstead WWTW and not Thames Water who will pass the cost on to the community. The use of S106 should be explored to enable this.

It should be noted that the foul drainage proposed for the development relies entire of an active management system of pumping the sewage up to the Berkhamstead WWTW. The current pumping station on the south side of the Potten End Swing Bridge over the GUC has been responsible for significant pollution incidents. In these cases raw sewage has entered the Grand Union Canal (GUC). The reliance of an active control system, with a proven track record of failure is in appropriate for such a

large development. We suggest that the developer amends their application include a back up pumping station that can operate in parallel or a duty and back up to provide additional resilience and protection of the environment. We believe that the points raised above identify that the proposed development is contrary to Policy CS29 on 'Sustainable Design and Construction' as the foul drainage capacity is lacking and so the application should be refused.

#### b) Surface Water

The application includes the construction of several large lakes or attenuation ponds with the intention of slowing the surface water as it travels across the proposed site. No detail is available on to the construction or maintenance of the lakes. Lakes such as this will be effective at slowing surface water flow across the site but it is appropriate to know the design, construction, depth, design of the edges how the ponds will be managed to ensure they are healthy and the safety of the residents, particularly young children especially close to the primary school and the well used adventure playground. This needs to be provided. Details on the provision and maintenance of lifesaving equipment, warning signage also needs to be provided. Until this information is provided in full we believe this is contrary to Policy CS29 on 'Sustainable Design and Construction' in that the proposals for surface water drainage are insufficient.

The drainage ditch shown on drawing 16-21-1005 and other in that series appears to be a straight featureless design. It does not include meanders to slow the flow of surface water, or increase the bio-diversity. Once again this is contrary to Planning Policy CS29 on 'Sustainable Design and Construction' and therefore the application should be refused.

We note the use of Poured pavement in drawing 16-21-1005 and others in that series but no detail is provided to ensure the provision of porous pavement remains in place in the long term or on future built parking area to maintain the run off figure provided in the calculations. As no details have been provided on how this will be done then this application should be refused.

#### 7) Cost to the Community

The application includes proposals to widen roads, make new access points, close roads, disruption caused by road works, instal new sewers, build roads across footpaths, increase the costs of road maintenance, require air quality monitoring and places additional burden on local amenities to name just a few. These costs are felt by the local community in the form of increased rates or a drop in service provision by the local council. We request that Dacorum BC fully explore the additional costs that this significant development will place on them and we ask that measures are put in place to recover all of the costs they incur either via a CIL or a Section 106

agreement for the life of the development. As no application has been provided by the applicant then this application should be refused.

### **Neighbour 3**

#### **OBJECTION**

Looking at the overall site plan there are a number of things that concern me. Firstly the increased volume of traffic to the area in general and whether the infrastructure will cope with that amount of additional vehicles.

Secondly should there not be more amenities being provided for youngsters to enjoy and use to avoid them wasting their time hanging around shops etc.? Has anyone engaged with the local clubs to see if there can be some co-ordinated and thought through approach to share existing resources?

Thirdly having a travellers site so close to a highly populated housing development doesn't do either parties any favours unfortunately the travelling community don't have the best of reputations when it comes to integrating. Also access off the lane could lead to vehicles being left in the lane as opposed to on the site creating a potential hazard and danger to all users. This is not a good spot for a site such as this in my humble opinion and will cause a lot of unnecessary hostility and objections to the development.

### **Neighbour 4**

#### **OBJECTION**

I object strongly to this proposed development, which is plainly ill thought out, unsustainable, unpopular with all local parties bar landowners and the developers and reprehensible. Listen to local people and save the site!

### **Neighbour 5**

#### **OBJECTION**

I object this development primarily because I believe it to be far too large and will cause complete chaos to already strained roads and traffic in the west Hemel area.

I agree there is a need for new houses to be built but 1100 homes and the huge loss of greenbelt land on the proposed plot is unacceptable. A smaller development with the correct infrastructure would be a much more viable solution.

Furthermore I feel the proposed gypsy/traveller site should not go ahead in any LA3 plans Hemel Hempstead already has a large traveller site while plenty of other places within Dacorum with adequate locations have none.

### **Neighbour 6**

#### **OBJECTION**

The community can not cope with an increase in houses and the roads are not built to sustain this sort of traffic. The reason the area thrives is because of the landscapes that surround us.

### **Neighbour 7**

#### **OBJECTION**

There are too many dwellings planned for the space designated. The land is green belt and has public footpaths and supports wildlife. The development will lead to intolerable congestion and our roads, doctors surgeries and local shops cannot support the added pressure, it is already almost impossible to park at our two local shopping centres. If this development does go ahead the amount of planned dwelling must be reduced, green space, play areas ,shops, doctors and a school must be included. There must also be a wildlife corridor and a continuation of access to Pouchen End lane by public footpath.

### **Neighbour 8**

#### **OBJECTION**

As with all planning matters issued either locally or by county there appears a reluctance to draw attention to applications where possible detrimental changes are to be agreed. The proposals to build 900 dwellings on an area previously designated as 'Green Belt' could be seen as disadvantageous to the district but to further increase it to 1100 dwellings on the same footprint is outrageous. When questioning the developers and planning department regarding the impact on the local infrastructure the reply has been, 'it is a matter for the highways department, the area health authority, the education department' etc. As it was made clear that these were not issues to be considered by the planning department or the developers a conclusive response about how the residents' concerns would be addressed has never been given. The detailed assessments carried out by consultants is buried deep in the planning application and difficult for the laymen to understand. It has also been left ambiguous as to the responsibility as who and how the proposed medical facilities, shops, recreational areas etc. will be built and funded. These are very real concerns for all the residents in the local area so how they will be resolved should be



made clear at the start of the application. It is difficult to understand why Pouchen End Lane is sacrosanct with plans for a very substantial barrier between the development and Pouchen End Lane. Why has this not been replicated on other roads?

It also appears strange that the 'Traveller Site' is situated in a position where it is excluded from the main development. This is unhelpful in integrating them into the community and will marginalise them in the future. This is not the best position for travellers or the local community but is probably the best solution as far as the developers are concerned. The Planning Statement West Hemel Hempstead Paragraph 6.48 states that the application should 'Incorporate 7 pitches for gypsies and travellers at the site with good access to the primary road network.' Access via Chaulden Lane does not comply with this.

The consultants assessment of Chaulden Lane is misleading and is not representative of the day to day use of the Lane especially on a Sunday. The provision of refuges will potentially increase the volume of traffic and also increase speeds. This lane is already suffering from both light and heavy traffic and is unsafe for pedestrians and cyclists. There should be no access of any kind into Chaulden Lane which would make current matters worse.

#### Summary of Objections:

The appropriation of Green Belt Land to the detriment of the local and general environment.

The density of the development with the associated social and environmental consequences.

The requirement for a Traveller site on this development with its inappropriate positioning making for a lack of integration and poor site accessibility.

The lack of realism in transport considerations for the impact on the local area. Also the consideration for the mobility for the disabled, elderly and young within the site.

The lack of detail regarding the suggested amenities within the site.

#### Conclusion:

The Planning Department should reappraise the scale and detail of this this development.

#### **Neighbour 9**

## OBJECTION

your consultations was for 900 dwellings when did you hold a consultation to change this to 1100 dwellings? The road infrastructure for the west side of Hemel cannot take the proposed development in your letter. Widening junctions will not help with the traffic situation, the roads are bad now so this development will only make for very unpleasant journeys for all residence. using the excuse that the new development will be encouraged to use public transport is rubbish.

Noise and disturbance from the finished development will impact on us and all the residence of Lindlings, and we will lose our privacy. Your cutting services within Hemel Hospital, how will we all cope with the amount of building you are doing in Hemel without a hospital? I'm against the development on such a large scale in will definitely impact on the people who actually live and work in the west of Hemel.

Herts county council are moving out of Apsley, getting out while they can, they know it will not a good area to work in! Please rethink the scale of your development. Do the people who are making theses decision actually live in Hemel. Think our our town and what you are doing.

### **Neighbour 10**

## OBJECTION

The development numbers need to be decreased, for the following reasons:

1. The area can not deal with increased numbers in many ways.
2. I live on Northridge way, this road has commuters parked there continually it will not be able to deal with more. Many currently drive down from fields end and surrounding areas. The traffic in the morning is queuing along Northridge way, this will be increased greatly.
3. The train station can not deal with increased numbers. The car park is over crowded and not capable to deal with Increased numbers.
4. The town has no A&E.
5. Any development of any size needs a school and GP built in phase 1 not later - you need to give back and show early on that this is happening.
6. Shrubhill common can not become an 'isolated' nature reserve, this defeats the object.
7. Any construction parking / amenities have to be on the site.
8. Chaulden lane is a 'country road' and already a rat run, there are apparently plans for development on Camelot - this does not seem to have been taken into account?

9. There will be no green areas dividing the areas of Hemel, the new town is losing its culture and identity.

Overall the current plans are totally unsuitable for the area designated.

### **Neighbour 11**

#### **OBJECTION**

Please accept this email as a vehicle to express my grave concerns & disappointment over the Planning Application LA3 ref 4/03266/18/MFA.

I have lived in Chaulden for coming up to 20 years and always enjoyed the surrounding beautiful Green Belt countryside which is soon to be taken from us existing homeowners by the development LA3.

I sincerely appeal to the common sense of Dacorum Borough Council to :-

Review the siting of an unwanted Gypsy and Traveller site proposed to be sited on Chaulden Lane within phase One of Proposed works :- with access to the site being via Chaulden Lane.. Chaulden Lane is currently struggling with the rat run of traffic using it in peak hours as access to A41 & surrounding area .. The proposal of the Gypsy Site will increase vans and lorries using a Lane not capable of accommodating such usage.

I also believe the housing of a Drainage Pump facility on Chaulden Lane with access also off Chaulden Lane in Phase One, will also add to above traffic and thus unacceptable congestion.

The original application was for 900 dwellings in LA3, this is now to be 1100 x dwellings plus a care home (70 Residents) with the added future proposed development of the 'Horses field'. How can this possibly be feasible !!! At the time of the 900 x dwelling application an independent traffic report stated that the development would bring GRIDLOCK to Long Chaulden and surrounding roads ..The Infrastructure is simply not in place to accommodate such an increase in traffic to area.

Please advise what are the plans for the 'Horses Field' Off Chaulden Lane ?

Our beautiful little corner of Hemel is soon to be destroyed by :-

"A Gypsy and Traveller Site unwanted by local residents.

"A housing development LA3 to be sited in an area with insufficient infrastructure ref traffic , schooling , medical facilities.

"Promised Green Land within development being constantly reduced by expansion of houses within LA3 proposal.

I implore you to please take on board the thoughts, concerns and comments of existing householders in the surrounding area & West Hemel Action Group WHAG acting on our behalf.

I genuinely feel bullied by this development and the constant stream of bad news brought as a result of this application.

Please take into consideration & look after us existing residents!

## **Neighbour 12**

OBJECTION

Dear Sirs,

I wish to make comments on the proposals for the LA3 development. I accept that new housing is essentially required, but my concerns surround the overall impact certain aspects of it will have on the local area for me, my Children and other residents of Hemel Hempstead.

The first point is overall Housing provision and the impact on the roads.

Firstly 1100 new homes represent a 23% increase in the volume of new homes originally consulted in 2016, which at that time proposed 900. This number of homes is likely to add an additional 2000 + cars to the area. The sheer volume of new homes and therefore cars in the area will have a terminal impact on local roads, leading to total gridlock of the West Hemel area, and raise significant safety issues.

The Road infrastructure improvement proposals do not deal with the increase in traffic. It proposes minor changes to road junctions, with no provision for new roads or for parking.

These 'improvements' whilst already insufficient must be the priority BEFORE beginning the development. Too many question marks remain on the timing, scale and effectiveness of the road infrastructure proposal and will ultimately have a

detrimental impact on the local business and community needs through an unacceptable impact on local roads.

The second point surrounds the HCC site which is not in the application - what is the future of that site?

It needs to be made clear what the intended future development proposal looks like for the HCC site located to the South of the overall LA3 development, adjacent to Chaulden Lane.

There has been rumours that this too will be used to build houses. Is this being considered by the Planning Department at Dacorum Borough Council in a joined-up way with LA3 and other proposed new homes sites including Pix Farm, Marchmont Fields and Station Gateway?

The impact of LA3 on local roads and amenities is already untenable in terms of the number of new cars expected to the local road network.

The HCC site has no viable access opportunities unless through the LA3 development. Access via local roads including Chaulden Lane and Lindlings are not viable; Chaulden Lane is a single track road with insufficient passing places, is not served by public transport and has no pedestrian footpath. Lindlings has a high volume of traffic already. It does not allow 2 cars to pass each other as it has residents parked cars along the whole stretch of the road.

The third point surrounds the proposed G&T and foul pumping station.

The proposed site presents untenable issues surrounding access, safety and the environmental impact. Its proposed access is served by a rural single-track lane with insufficient passing places that is regularly used as a rat run by car drivers. Chaulden Lane and Pouchen End Lane, both rural lanes, does not provide a footpath, yet it is regularly used by pedestrians. Increasing volume of vehicles, especially large vehicles will pose a significant safety issue, and inevitable danger to life.

Additionally, it is not served by any public transport. The flaw here is that neither Chaulden Lane or Pouchen End Lane would be able to handle a footpath or buses as it's a single track, nor would it give provision for cycling.

Whilst I'm no expert, I am aware of the national Planning Policy Framework. Clause 84 in this document states that planning policies and decisions should recognise that

sites meet local business and community needs and does not have an unacceptable impact on local roads.

Granting any access from Chaulden Lane or Pouchen End Lane represents significant danger to life.

## Inclusion

The other issue in the proposal for the G&T site is inclusion.

By virtue of the fact the G&T site cannot be accessed from the LA3 development, this is a wholly exclusive proposal, segregating the G&T community from the overall development.

Other issues with the proposed phased construction surrounds what's NOT being built in phase 1.

Primary School - with recent closure of Martindale School which would have been one of the closest schools to Phase 1 LA3, there is already a severe shortage of primary school places in the area of West Hemel. With an additional 350 homes, school places will simply not be available for people so it seems essential that Phase 1 includes primary school provision.

Community hub - The only 2 local retail and community areas of Warners End and Chaulden are already hugely oversubscribed. Finding somewhere to park in these areas is already impossible, and the proposal not to include the Community Hub in Phase 1 will put unsustainable pressure on these local retail areas.

GP surgery - Is also not included in Phase 1. It can already take 2 weeks for a Surgery appointment, with Parkwood Drive Surgery not taking on new patients as a result. Where then do the occupants of the 350 new homes go for a doctor's appointment.

## **Neighbour 13**

### OBJECTION

I believe that the current infrastructure is totally inadequate to support the proposals. There is also the Bugler development on the former Martindale school site to

consider. The 65 new dwellings currently being built here in addition to the planned 350 houses of LA3 phase 1 will significantly increase traffic on Boxted Road and in the surrounding area which is already a commuting 'rat run' to and from Berkhamsted. Pressure will also be put on the existing doctors surgery, nursery, schools and local community centre/shops of Warners End. High traffic and parking are currently a BIG issue here without any further increase in the local population.

### **Neighbour 14**

#### OBJECTION

I wish to register my objections to the proposed LA3 development based on the following questions:

An increase in the number of proposed houses - 900 to 1100 resulting in more crowded housing and reduced green space. Why has DBC allowed the developers to make this increase ?

Parking estimation for each house is reported as half a car per household - unrealistic and does not allow accurate planning for parking and road usage. On what evidence was this decision made ?

What are the improvement plans for managing increased traffic and averting gridlock ?

Hemel Hempstead railway station - LA3 is likely to attract commuters - what plans are there for the increased traffic and parking at the station?

NO GP surgery is planned for phase 1 - how will local surgeries cope with increases in practice population ? Parkwood Drive has been unable to take on new patients for 6 months due to a lack doctors staff, mainly retirees. Current Dacorum residents will be adversely impacted by their surgeries needing to accommodate an influx of new residents, estimated at 800 in the first phase.

What provision has been made to prevent houses to be purchased on a 'buy to let' basis ?

The plans indicate houses being built right up to the Chiltern Path which is adjacent to my property - why is there not a green corridor to preserve some privacy and for conservation of wildlife ?

Will there be restrictions on where construction vehicles can be parked and cleaned ? Not on public roads hopefully.

Why is the Gypsy and Traveler site going to be managed by an independent organisation and not by DBC ? This creates exclusion rather than Inclusion which I understand is HCC policy.

### **Neighbour 15**

## OBJECTION

I OBJECT to these plans.

The proposed traveller camp and access to the pumping station from Chaulden Lane are completely inappropriate. Travellers use mobile homes and drive large lorries. Chaulden Lane cannot be enabled for this type of traffic just by providing passing places at the west end. Currently, Chaulden Lane is a quiet road used by pedestrians to walk from Chaulden to access the canal side at Winkwell. Some motorists use it as a rat run to avoid the congestion on London Road at the Box Lane and Felden Lane junctions. I personally don't because it is frustrating to meet and give way to other vehicles. At weekends the whole lane is blocked in the built-up part to the east by cars parked for the Rugby Training.

There is hedgerow both sides of Chaulden Lane, which provides a wonderful habitat for bird and animal life. While most of the world now rates such habitats as important to preserve, these developers are seeking to destroy the habitat. I am sure there are more appropriate places for a travellers' site in the borough with the correct accessibility and not on green belt land.

There is only talk of a proposed doctors' surgery in these plans. The nearest surgery at Parkwood Drive is overloaded and unable to take on new patients. Access and Car Parking is difficult most the time.

### **Neighbour 16**

## OBJECTION

We, my husband and I, recently attended a meeting giving details of the LA3 development.

The number of proposed houses has increased significantly from the original 900 to 1,100 not including whatever is planned for the remaining plot by Chaulden owned by the Herts county council. It seems that the developers are allowing enough car parking for 1/2 car per dwelling which is unrealistic. Most dwellings will have at least one car, sometimes 2 and even up to 3 or 4.

Phase 1 also does not include the school and Doctors surgery. The local surgery, Parkwood Drive surgery, is at full capacity. It is not taking on any more new patients. Where are the new residents going to send their children to school? Will more GPs be provided for them in this area during phase 1?



During peak hours, traffic from Chaulden builds up at both ends of Northridge road as these are the main junctions by which Chaulden residents access the main roads out of Hemel. When any incidents occur on the A41 or the London rd/B4505 the local roads become very congested. With the addition of the extra traffic from LA3 when will the roads be adapted to fit the increased number of cars? I think the road improvements should happen before or early in phase 1.

### **Neighbour 17**

#### **OBJECTION**

I am writing with some of my concerns regarding the proposed LA3 Development.

If my information is correct, I am shocked to learn that the proposal to commence Phase One is to go ahead without any of the infrastructure put in place. The original proposal was for 900 dwellings and now that has been increased to 1,100. I would hope that revised studies have taken place. Where are these families going to have access to school places, doctors, hospital etc. as we are led to believe we are at breaking point already?

Chaulden Lane is a rural single track country lane, totally unsuitable for large and emergency vehicles. It is already used as a rat run for people wanting to get to Berkhamsted. We are saturated with cars at peak times and when there are hold-ups on the motorways, traffic all comes through Hemel. Our roads will become gridlocked. Parking is already a problem and developers do not take this into consideration. Wherever you look in Hemel, more properties are being built. We need common sense and logic to protect our environment.

### **Neighbour 18**

#### **OBJECTION**

I passionately object to this development on the following grounds:

1) Access to the proposed gypsy site at Winkwell is proposed to be via Chaulden Lane. As a resident on this road I am greatly concerned by the the profound increase in traffic over the past couple of years. It is used a shortcut by locals to by-pass congestion on London Road and easy access to the A41. The road is not designed for 2 lane traffic and I am increasingly alarmed at speeds along the residential stretch. As a parent it is also a continual danger particularly when we live directly opposite a park. Increase in traffic for access will significantly impact the road and increase concerns of safety.

2) I am aware that the Buttons yard beyond Chaulden Lane has also been given permission to build new dwellings which will impact this area even more.

3) The entire LA3 plan has been slightly ambiguous in terms of final size and access/emergency access. Chaulden Lane/Winkwell will ultimately be impacted even if access to the new estate is from the northern side via The Avenue. Traffic/locals will avoid London Road during busy times and utilise the farm roads off Winkwell to Potten End. Larger vehicles will have to access the proposed area via Chaulden Lane (Camelot end) due to the constraints of the Winkwell swing bridge.

4) This is a beautiful part of Hemel and we moved here to enjoy the freedom and outlook across the rugby fields and canal. I strongly feel that this development will have a significant impact on the poor infrastructure during building and when complete. I urge you to re-consider.

### **Neighbour 19**

#### **OBJECTION**

The initial development of 350 houses does not include any additional services such as shops, school or doctors. These should all be included as well as the existing doctors cannot cope with any additional patients, and parking is already at a premium.

A bus service should also be part of the initial development and, although DBC do not support financially, the developer should be asked for a contribution towards running costs. This would encourage the new residents to use public transport rather than drive and cause additional traffic on already congested roads especially at school times.

The development of 7 pitches and a Foul Drainage pumping station on Chaulden Lane is inappropriate as this is a rural lane and cannot cope with any increased traffic. It is already used as a rat run during commuting time. If it was to be widened which is the obvious solution it would totally destroy the rural nature of this lane.

The increase from 900 houses to 1100 houses is too many as the green corridors appear to have been used to cram these additional houses in ie the existing footpath across to Pouchen End Lane and the footpath from Shrubhill Common. This is detrimental to both people and wildlife.

Also of concern is the HCC site off Chaulden Lane which is not included in the application. Is this going to be another housing development as this would increase even more traffic onto Chaulden Lane as well.

## **Neighbour 20**

### OBJECTION

Really concerned about growing number of houses being squeezed in (20% increase on what was already a huge development- surely not?) and lack of infrastructure to support it, particularly pressure on roads, GP's, shops, wildlife. Very concerned re safety issues with Chaulden Lane as a cut-through for greatly increased traffic. I am Senior Citizen with son with learning difficulties and have two cats. Very busy road, over-used by massive lorries and transporters already. Increased traffic on this route insupportable. Also concerned about Travellers Site being funded by travellers themselves - what control will there be regarding additional littering/health hazards, unsafe driving, increase in local crime (based on experience of traveller invasion in Wigginton while living there some years back - local Tesco store introduced security at front door and shoppers were issued with chains to lock their handbags to their trollies securely - doesn't bode well for safety of locals). Very concerned about extra access onto Chaulden Lane by drivers from travellers site. Cannot be safe for them or locals surely? H-H always known for green spaces between housing areas - where are green spaces for human and wildlife in new development - disappearing in direct relationship to increasing number of houses with related decline in quality of life for inhabitants. The cramped nature of new housing and pressure on existing householders is a combination guaranteed to destroy quality of life for all in West Hemel area with little concern being shown by planners/Dacorum. Very depressing prospect.

## **Neighbour 21**

### OBJECTION

I am writing to object very strongly to the building of 1100 new houses planning application re: 4/03266/18/MFA in the close proximity of my property and home on greenbelt land. I have been trying to sell my house in vain for 2 years, reducing the price considerably. All to no avail. Protective buyers who made an offer always come back to cancel it as soon as they find out about this plan. Further more to make matters worse the plan was originally passed for the building of 900 houses only. 300 have been added without any consultation or warning. All surrounding existing and oncoming properties are further blighted by the building of a group of houses for gypsies which is very very worrying for existing and prospective owners alike. Chaulden Lane and its neighbourhood are one of the nicest quietest and safest areas of Hemel this wrecking development is going to impoverish the neighbourhood financially and physically beyond all recognition, destroying the countryside and increasing noise levels and pollution exponentially for thousands of inhabitants whose children will inherit greatly devalued property. The lanes around the gypsy camp are very narrow and this gypsy camp should be build somewhere far more convenient for vans or caravans, near the M1/ Maylands industrial estate where access is easy and there aren't any existing residents likely to be rightly upset. This development is pure vandalism.

## **Neighbour 22**

### OBJECTION

Please accept this email as a vehicle to express my grave concerns & disappointment over the Planning Application LA3 ref 4/03266/18/MFA.

I have lived in Chaulden for nearly 15 years and always enjoyed the surrounding beautiful Green Belt countryside which is soon to be taken from us existing homeowners by the development LA3.

I sincerely appeal to the common sense of Dacorum Borough Council to :-

Review the siting of an unwanted Gypsy and Traveller site proposed to be sited on Chaulden Lane within phase One of Proposed works :- with access to the site being via Chaulden Lane. Chaulden Lane is currently struggling with the rat run of traffic using it in peak hours as access to A41 & surrounding area .. The proposal of the Gypsy Site will increase vans and lorries using a Lane not capable of accommodating such usage. I walk down Chaulden Lane on a daily basis to the station and have noticed over the last few years a huge increase in traffic even at the early time of 6.30am. Further development will make this untenable as you get to peak periods. I also believe the housing of a Drainage Pump facility on Chaulden Lane with access also off Chaulden Lane in Phase One, will also add to above traffic and thus unacceptable congestion.

The original application was for 900 dwellings in LA3, this is now to be 1100 x dwellings plus a care home (70 Residents) with the added future proposed development of the 'Horses field'. How can this possibly be feasible !!!

At the time of the 900 x dwelling application an independent traffic report stated that the development would bring GRIDLOCK to Long Chaulden and surrounding roads ..The Infrastructure is simply not in place to accommodate such an increase in traffic to area.

Please advise what are the plans for the 'Horses Field' Off Chaulden Lane ?

Our beautiful little corner of Hemel is soon to be destroyed by :- A Gypsy and Traveller Site unwanted by local residents.

A housing development LA3 to be sited in an area with insufficient infrastructure ref traffic , schooling , medical facilities.

Promised Green Land within development being constantly reduced by expansion of houses within LA3 proposal.

I expect you to please take on board the thoughts, concerns and comments of existing householders in the surrounding area & West Hemel Action Group WHAG acting on our behalf .

### **Neighbour 23**

#### OBJECTION

To Whom It May Concern:

My wife and I live right next to where the new access road for LA3 development will be.

We have some concerns:

#### 1. Increased Housing:

The planning application talks about 1100 housing, although we were only consulted on 900. What I don't understand is, now that the hoc land is excluded from the development, how it is possible to increase the number by 200 within the designated la3 land development excluding HCC land?

Have properties been crammed in?

Does that mean that the buildings will be higher than the original 2 storeys? It would be unacceptable seeing high rise blocks on the beautiful green belt space.

In the original plan which has probably gone through so many changes, the shrub hill common nature reserve was going to be extended. But in the current plan only a small area will include trees and green space. Can't more trees be planted?

We need more green spaces to prevent air pollution!

Also according to the plan, close to our house there is a lake or something like that. What will be the long term effects to put property with water being so close to our house? Normally House insurance premiums would increase if a house is close to water, as it might have a risk of flooding.

## 2. Facilities:

We have noticed that schools, shops, doctors are not in Phase 1. Where will all the tenants go? Parkwood surgery is not accepting more patients and it's already a long waiting time for appointments.

Is Parkwood going to expand or will it be a new doctor clinic? Parkwood surgery hasn't been taking new patients for 6 months.

What about parking? I didn't see any. Where will all these new tenants park?

Doctors surgery, shops schools and a parking should be in phase one!

## 3. Increasing traffic, road, public transport infrastructure:

I understand there have been proposals for some road improvements, but when will this take place?

Has the extra traffic from other developments namely Marchmont Fields, Station Gateway, Pix Farm Lane etc been taken into consideration?

It would be sensible to carry out road and infrastructure improvement before building new houses. Shouldn't this be in place before all projects are finished?

Roads and trains are already very congested!

Will the station layout be changed and the parking at the station increased?

There is only 1 bus stop in the whole LA3 development. How will this give new residents alternative public transport links to station etc. and prevent roads from becoming extremely congested?

There should be more designated bus stops in the new development.

Vehicle weight limit road signs in Long Chaulden and surrounding areas have already disappeared. Vehicles weighing more than 7.5t are not allowed in these roads. Will our council tax have to pay for the road improvements after the development is completed or will developers pay to repair the roads?

Please note that air quality will eventually be affected by the increased number of vehicles.

No changes to rural roads should be made!

#### 4. Working vehicles:

As we are so close to where all the works will take place, is there a guarantee that work vehicles will be parked within LA3 and not outside?

Will vehicle washing facilities be provided on site?

Can't workers be transported from the station via bus to the various work sites?

#### 5. 7 travellers sites:

How many caravans will be on the site?

Who will make sure litter is cleared from these sites?

We have a housing crisis, developers have already added 200 housing to LA3, why are we giving up land to build a travellers site? Can't this land be given back to the developers to build more affordable housing/ spread out the ones they are planning to build?

#### 6. G&T site/ pumping station:

There is an access to Chaulden lane, but this will impact on our rural lanes- which i understand needs to be protected and according to a policy, they cannot have anything done to them and/or be expanded on.

According to Barrats planning statement "Prevent further vehicular access onto rural lanes." The current plan contradicts this statement.

Why are developers allowed to change housing numbers, sizes of houses, potentially increase the height of building etc.?

Who will be making sure they stick to the planning statement?

Will residents see the final plan before it goes ahead and could we/dacorum then oppose these changes?

## **Neighbour 24**

### OBJECTION

The purpose of this email is to provide feedback on the proposed development of dwellings in the LA3.

I strongly oppose to this development as it does not take into account both the impact on the existing community as well as the future needs of a wider community in the area.

It appears to be a pure property development speculation as the areas in question are in proximity of the convenient train station but no consideration has been given at all at the amount of infrastructure and additional facilities that such a large development will require to bring it in line with a minimum of living standards.

I therefore ask you to take this as well as the many feedback not in favour of the development you will have received by local concerned residents to stop this insane and ill thought project.

## **Neighbour 25**

### OBJECTION

I am writing to express my concerns regarding planning application listed above

I have lived in the area for 11 years after moving here from St. Albans because of the volume of traffic and parking problems. We love the fact that there are lots of beautiful green belt areas around us which might soon be taken by the new proposed development

We would ask you to review the siting of an unwanted Gypsy and Traveller site on Chaulden Lane which would only add to an increase of Lorries and Vans and more traffic, and the enormous strain on our resources.

Originally it was 900 dwellings which has now increased to 1100 plus care home for 70 residents this is unacceptable.



Our lovely peaceful area of Hemel is soon to be destroyed

Please consider how this will affect the existing householders within this area. We feel deeply upset and stressed about the whole situation. Please consider how this will affect us existing residents.

### **Neighbour 26**

#### OBJECTION

After studying the plans there seems to be little thought to the inclusion of the traveller's site. It is Government policy that travellers should be included within the development, particularly for easy access to shops and schools, there is only a footpath linking the development. The access to the travellers site is by rural lanes that cannot take caravans of 3.6m wide.

I am concerned that with the large number of houses in this development that the surrounding roads will not be able to cope, particularly the rural roads. Some of these roads already overloaded and have a safety issue for pedestrians and cyclists. This is issue made worse as there is no foot paths on Pouchen End Lane, Chaulden Lane and Winkwell.

### **Neighbour 27**

#### OBJECTION

Given the limited access to LA3, and restricted road infrastructure of the surrounding areas, the total number of houses planned for LA3 is excessive. There is also inadequate guaranteed provision of local shops, doctors, dentists and schooling.

The development will put excessive traffic onto already difficult areas such as Galley Hill, Boxted Road and especially Warners End near the Stonycroft shopping area. Stonycroft already causes traffic problems even before LA3 is developed.

Emergency access and ccess to the proposed Travellers site is at best dubious due to the restricted nature of Chaulden Lane.

### **Neighbour 28**

#### OBJECTION

Under the rural roads act no rural road should be used for access, yet the plans state that the G&T site will be accessed from Chaulden Lane

The emergency access onto Chaulden Lane can be unlocked/damaged causing increased traffic flow onto an already busy Chaulden lane which is currently used as a rat run

In phase 1 you are proposing to build 350 houses and the G&T site, therefore there will be an approximately 350 extra cars using the surrounding roads to access the site. Any changes to surrounding roads need to be implemented in phase 1 and not when the development is complete

No provision for a doctors surgery, yet Parkwood drive surgery hasn't taken any new patients for 6 months, parking and getting a doctor's appointment is already a problem at this oversubscribed surgery

A school needs to be built as part of Phase 1

All construction traffic needs to be parked on site and not on surrounding roads

The G&T site should be managed by the council to ensure that the site is managed correctly

On the original outline document there was more green spaces and cycles paths. This has been replaced with an additional 200 houses

The council needs to consider the impact of all the developments that are currently being planned in Hemel Hempstead as our road and rail infrastructure won't be able to cope the town will be gridlocked.

## **Neighbour 29**

### **OBJECTION**

Bourne End just cannot cope with any further traffic. Already the lanes are used as a rat run to get to the A41 which causes all sorts of traffic problems especially at the Winkwell end with aggressive behaviour from drivers and people travelling at high speeds round the lanes which is very dangerous. Especially with the further Buttons development that is being proposed down Pix lane bring further traffic to an already congestion area.

The travellers pitches also seem very randomly positioned completely cut off from the community that they are supposed to be included in which doesn't fit with the government guidelines for traveller's pitches, coupled with the access point coming off Chaulden lane with the gradient of the land it's totally inappropriate to be used for this sort of access as the lanes are just not suitable as they are not a proper highway which it should be for these sort of heavy vehicles it has also been advised within the documents that it's unsuitable. Therefore we object based on these grounds as a better solution needs to be found to alleviate the pressures on the lanes not add to them making them even more dangerous than they are already.

### **Neighbour 30**

#### **OBJECTION**

Strongly object to the changes proposed in the new application in LA3/Phase 1, on the grounds of:

- increased number of properties in excess of 900 specified in the original application put to the public
- the infrastructure will not be in place for the first phase, and even for the other phases with planned facilities we are already aware that there are not enough GPs to staff the surgeries or dentists for the current populations. Whilst looks feasible on planning papers, in reality it is quite different
- serious concerns about the proposed new access route into the traveller community site from Chaulden Lane whereby in the original plan it was specified that there would be no access route in and therefore no additional traffic on a small county lane
- Chaulden Lane is narrow with many bends, enabling only one car to pass at some sections of the road
- The lane is already busy with commuter traffic which impacts on the health, wellbeing and safety of the residents including children living in the road. This also creates road safety issues for the children using the park, the field and attending the nearby primary schools. This area of danger and risk will only increase with additional traffic and access routes.
- for the majority of the Lane there is no footpath. If the Council is interested residents getting fit where are they supposed to walk safely on the Lane without the chance of increased accident from motor vehicles?
- the planning permission for 90 units at Buttons Yard will also additionally put a strain on the road's capacity and safety, and together with heavy machinery in use for this site having to access via Chaulden Lane the road will become impossible to use safely as a pedestrian.
- any access and machinery for the Phase 1 proposal will only add to this.

- the road surface was recovered in 2018, and when residents queried the standard of the road covering we were informed that since the road was a lane and did not have heavy usage (we would question this fact!) a different type of road surface which is less expensive was sufficient. How will this Lane surface cope with such increase traffic flow?
- Chaulden Lane is a county lane, which boarded on classified green belt land when many of purchased here. The countryside around us must be preserved and a balance in place.
- considerable concerns about the removal of the hedgerow and what that means for wildlife and the surrounding ecosystem.
- what hedgerow, ecosystems, wildlife left will be severely be impacted by the increase road use, number in vehicles, and congestion.
- the pollution levels will significant increase and damage the health of the children and older persons living locally.
- too much is happening the local area with planning and developments which will change the character, structure and the look of the environment.

Finally this Lane is the local route used by locals travelling to work in Berkhamsted and Tring, who do not use the London Road route due to the significant congestion there. With the proposed build at the Hemel Rail Station to incorporate flats and a new transport hub, I have serious concerns about the capacity of this area to cope. How does the Council really think all of this is manageable???

### **Neighbour 31**

#### **OBJECTION**

I would like to make a submission to the request for responses to LA3.

#### **Access Roads:-**

The current situation as to the surrounding roads to the planned LA3, these are full of traffic with queues getting longer and longer month on month as the need for people to travel to work, etc. has increased as the opportunities for employment in the local area has diminished.

All the traffic from this development has been designed to exit to the east along these already loaded roads, there is no exit from LA3 to the west, even though the A41 bypass is in very close proximity. I understand that a connection of this type would not be cheap, so you have chosen to allow all the traffic to load existing clogged roads because it's cheap.

One of the Main Access Roads (The Avenue) already has usage issues for pedestrians which the council have chosen to ignore.

1. The number and positioning of pedestrian access crossings of The Avenue are too few, which makes them have to walk through the muddy grass to cross the road.
2. The newly installed streetlights (LED) along The Avenue now leave the pathway on the south side in complete darkness, as the lights only illuminate the road which is a bit pointless as cars have lights pedestrians don't. This makes people feel unsafe as they walk in complete darkness and with the hedges overgrowing the path they are forced into the muddy grass in the dark.
3. The Avenue is a relatively straight road which currently has speeding motorists driving up and down it, only slowed down by the parked cars at one end. When this road is extended into the new development it will avail motorists an even longer run up to speed. Thus causing a huge future problem/danger for local residents.

Facilities:-

The original planning application stated that there would be a doctor surgery, shops, community centre and a school. All of these appear to have been excluded from the latest plan of phase one, is this to make the development more profitable rather than test community, if you don't believe it, try getting a place in one for your child !

With the nationwide reduction in Doctors Surgeries there is a need for one in a development of this huge size, especially as you have increased the packing density from 900 homes to over 1100.

Development:-

The development has as I said increased in packing density from 900 to 1100 which makes this one of the most densely built estates.

I understand that each property is to have 0.5 parking spaces allocated to it.

Can I ask what world are you people living in ????

Might I suggest you have a drive round some of these modern estates during the day and again at night and see the parking mayhem that exists, and these are ones with a 1.5 parking spaces per property. Many people now have vans for their businesses which they park near their houses due to thefts of tools from vans, where are they

going to park ?. Have a look around the Fields End estate at night and note the number of vans.

Public transport is not good or frequent enough combined with an ever reducing service due to financial constraints means that this is not an alternative to a car.

So if you need an emergency vehicle to a property 'Forget it'.

Building a development with no space will not stop people buying vehicles, it will just mean these left over vehicles will spread out into the existing roads and fill them up.

Just have a look at junction at, Ashtree Way and Gravel Hill Terrace, which is clogged with cars after the parking restrictions were extended out from the railway station. There are going to be many collisions at this point in the future as it's a blind "S" bend.

Conclusion:-

In conclusion the planning of this development has been carried out without any understanding of reality and the way that the community in the area live, designed by people motivated by profit or a life based on theoretical design possibly achieved on illegal substances, because "Common Sense" or reality has not been used.

In spite of many public meetings where the community have expressed their views, these have just been ignored completely with the consultation process just as a SOP because of government requirements to make it look like you have, knowing full well at the end you just disregard all input.

### **Neighbour 32**

#### **OBJECTION**

I wish to OBJECT to this planning application for the following reasons:

##### 1. Extension of deadlines for comments

There should be an extension of the deadline for comments:

1.1. I haven't seen this planning submission advertised / published anywhere

1.2. The developer has taken years to get to this stage of applying for planning permission for a part of the development, yet it is expected of residents who are impacted by this, to work through almost 300 documents and to comment within 21 days! This is unreasonable

2. Increase in number of houses and other changes compared to the original consultation

2.1. The original consultation was based on 900 dwellings, the outline application is for 1,100, an increase in 22%. We, as the residents, were not consulted on this significant increase and have not approved this increase. This is not acceptable.

2.2. The plan also includes a foul drainage pumping station, which wasn't mentioned before

2.3. What other changes will the developers jump on us, without consulting us?

3. Infrastructure and services

The infrastructure and services should be put in place before the building of the 350 houses start. The total plan will add at least 2,200 more cars (2 per house) to roads that are already under pressure.

3.1. Traffic and parking

I request that the Council set the condition to the Developer that the road infrastructure should be put in place before any house is built.

3.1.1. Main roads connecting Western Hemel to the rest of town sensitive to any change

The Western side of Hemel has only 2 major roads serving as connections with the rest of Hemel, the motorways, the shops and places of work. These two roads are already under pressure and are extremely sensitive to any changes, for example during the recent roadworks on London Road at the Bovingdon junction, traffic was backed up all the way up Fishery Road and as far as half-way up Northridgeway. Adding all this new traffic before the infrastructure is put in place, will cause gridlock and significantly increased air pollution.

Are any new connecting roads being planned?

3.1.2. Lorries and other traffic during the build

Traffic will increase and roads will probably be blocked during the build process. The infrastructure must be put in place first

3.1.3. Long Chaulden and Northridgeway junction

I am very concerned about this junction. If only a simple roundabout is used as the junction, all these new cars that want to join Northridgeway from Long Chaulden, will cause traffic to build up in Northridgeway on Warner's End side.

#### 3.1.4. Parking spaces per dwelling

The developers are planning too few parking spaces per dwelling. This area is far away from all large the shops and businesses as well as the train station. Houses in Chaulden have at least 2 cars per household and in many cases up to 4.

#### 3.2 Public transport

The current provision of bus services to the rest of the town, especially to the Maylands area is insufficient. Most people have to drive, as the current bus service connecting us to the Maylands area, runs only at certain times. The bus services must be increased to give an alternative to using cars.

#### 3.3 GP

Parkwood Drive surgery is currently the closest GP surgery. My understanding is that they are not taking any new patients. Therefore a new GP practice will have to be built as part of this phase 1 to accommodate new residents.

#### 3.4 Trains and Station parking

3.4.1 Many of these additional people in this area are likely to use the train to get to work. The trains are already packed to more than capacity during rush hour. What improvements will there be to increase trains?

3.4.2 Where will all these additional cars park at the station? Currently cars are parked in Camelot rugby club's car park and in between our Chaulden House Gardens garages. After this increase they will probably start parking in our street, Chaulden House Gardens as well.

#### 3.5 Shops

3.5.1 Three or four retail units are included in the plan. That is not sufficient. The closest grocery shop is Aldi's on London Road.

3.6. Building the school should also be part of phase 1 to ensure the necessary school capacity for the new houses



#### 4. Other developments

4.1. There are several other planned / ongoing developments: 65 new houses are being built on the Martindale school grounds, 56 houses are planned on Pix Farm Lane, further houses in Marchmont Arms Field and the Station Gateway are planned. According to hear-say, more houses are being planned on Camelot Rugby Club's grounds as well!

4.2. It appears as if the Council is considering each development in isolation, rather than looking at the overall impact.

4.3. Has the Council considered the overall combined impact on Hemel of all the developments being planned and currently taking place?

4.4. From a resident's point of view, Hemel has actually now reached its maximum capacity

#### 5. Affordable housing

5.1. What covenants will there be to ensure that the affordable housing remains affordable and doesn't become more buy-to-let accommodation?

5.2. Phase 1 includes only 35% affordable housing. Does that mean the rest of the development will be even more dense to bring the total up to 40%

#### 6. Gypsy camp and Chaulden Lane Access

6.1. By placing the access to the planned gypsy camp on Chaulden Lane, the developers are effectively excluding the camp from their development, i.e. this is social exclusion, in clear contravention of Government Policy. The government's 2015 planning for travellers document states that "local planning authorities [should] ensure that their Local Plan includes fair, realistic and inclusive policies".

6.2. If the Gypsy site is not included as part of the development, it should not be there at all, so I request that the Council ensures that the developers change the access to be the same as the rest of the development or that the gypsy camp is totally excluded from the development

6.3. The Council's own requirements are that gypsy camps are close to facilities. This site is about the furthest away from any facilities that you can get in Hemel.

#### 7. Rural Roads: Chaulden Lane, Pouchen End Lane and Winkwell

7.1. Widening Chaulden Lane will be in breach of Herts County Council policy and will further cause a rural lane to be used for the rat run

7.2. The developers state that they aim to maintain and minimise the changes to the rural character of Chaulden Lane, yet they are proposing to flatten and widen

Chaulden lane, make it the access for large caravans and other vehicles that need to access the foul drainage pump station and the emergency access. They also plan to use it as access for prefabricated portable buildings. This lane is just too small to accommodate this. Many of our trees will be damaged or destroyed in the process.

7.3. Chaulden Lane is a small rural road that cannot accommodate large vehicles. It is inappropriate to be used by caravans or other large vehicles.

7.4. As the lane is so narrow, hedgerows will have to be demolished and the lane widened to allow caravans to turn into the site, further diminishing our wild life.

7.5. Half way down Chaulden Lane, there are no pavements anymore. Allowing large vehicles or an increase in traffic, will place lives at risk

7.6. Furthermore: why is it necessary to have emergency access to the development from Chaulden Lane? How will the Council ensure that this access is not used by all other vehicles as well?

## 8. HCC site on Chaulden Lane

8.1. No clarification has been provided around the plans for this site. What is the future of this site? How many houses will be built here?

## 9. General

The increased traffic will cause further noise and pollution in our area.

### Comments following reconsultation

Although this seems to be a new consultation period the proposal of a 1100 new dwelling build seems to be unaltered from the previous proposal. My objections from before therefore remain unchanged. In short:

1. The new development will place pressure on the already struggling infrastructure:

1.1 Traffic access via Long Chaulden will cause immense pressure on Northridge Way and traffic coming from the top of Northridge Way will effectively be blocked if it remains a simple roundabout junction. Other roads that will need to be reviewed are Warners End Road, ST Johns Road and Fishery Roads. These roads are already busy and one hold-up causes long delays. The impact on the Magic Roundabout is also long delays.

1.2 The local doctor surgery already struggles to cope with the existing population, with 17000+ patients. It's already almost impossible to get an appointment, so with 900-1,100 new households I'll probably never see my doctor again.

1.3 Making the traveller access in Chaulden Lane effectively separates this from the new development, which is not within the Council's guidelines where it is supposed

to be part of the development. It effectively makes it part of the existing community. Chaulden Lane is too small and narrow for caravan access and major works will be required to make access possible. This is the worst possible, most inaccessible corner to squash a traveller site into. DON'T DO IT.

1.4 Statistics show that at least one person per current household travels to work by car. Sufficient parking needs to be created for these additional vehicles.

1.5 The little existing bus service is insufficient to draw people out of their cars, so traffic will increase by at least 1,100 cars,

1.6 Everything is on the other side of town: all the businesses where people will get work, all the shops, all the supermarkets. The traffic to the other side of town will just congest the streets even more than now. It would have been better to do a new development on the other side of town. As an example, over the last 2 weeks, there have been several days where it took 40minutes to travel from Chaulden to the Maylands business park due to weight of traffic. Another 1,100 houses on the West of Hemel does not make sense.

2. The 40% affordable housing measure will completely change the character of this neighbourhood where flats form only 13% of housing (slightly higher at 20% in Gadebridge).

3. The general design and style of house shown, looked nice. 900-1,100 new houses squashed into that inaccessible corner, is just too great a number.

4. To help that people won't have to drive to the other side of town for all shopping, include a bigger shop than just for example a Tesco Extra. Also a post office, hair dresser, pharmacy, gym.

### **Neighbour 33**

#### **OBJECTION**

Allocation of a primary school, GP surgery and community centre in the updated planning application is a welcomed and essential change. However, the infrastructure of Hemel Hempstead including healthcare and education provision, as well as transport links and consideration of traffic and congestion remains inadequate for such a large development. Access provision is poor and does little to address inevitable increase of congestion. The lack of a fully-functioning hospital in Hemel continues to be of grave concern. Up to 1,100 more homes will generate an even greater pressure upon Watford hospital which is currently overburdened. Whilst we recognise the need for new homes in Hemel Hempstead, the effect of this huge development with lack of a proper regard for existing infrastructure is extremely concerning, especially as an expanding population will have to travel to the next town for hospital treatment. Moreover, it is not clear whether the current proposed community facilities will definitely be provided. Clarification of this is required as well as proposed extensions to Parkwood Drive surgery and whether this particular idea would be adequate for local needs.

Dacorum Borough Council has failed to properly inform local residents of LA3 from conception. There has been inadequate communication from the Council to inform residents of planning and subsequent progress and changes in the planning applications. The majority of information and updates regarding LA3 have been conveyed through WHAG. Increases of the number of houses, as well as lack of specificity regarding social housing allocation, does not ease concerns of local residents. Local government and management has been extremely disappointing in terms of reassuring local residents and taking grievances seriously. The majority of the local community strongly opposes the development and nothing has been proposed to mitigate the long-term negative consequences of construction which existing residents will inevitably experience.

Concerns remain for the allocation of a travellers site including caravan access, and clarification is needed on its size and expansion potential. Allocation of this site in an isolated corner of the estate with separate access contravenes the policy of integration. Sections of the hedgerow in Chaulden Lane removed for access to this site as well as emergency access further along the road will be detrimental to the local and historical area and wildlife. Furthermore, it is unclear whether historical footpaths will be protected.

### **Neighbour 34**

#### **OBJECTION**

The continued strategy to build more and more houses in and around Hemel Hempstead, using existing infrastructures, that were not designed for the increased population that is now being forced upon the local community, I find deplorable. Our local planning authority has a responsibility to make sensible decisions on what should and should not be built. The following are key infrastructure areas that need to be carefully considered in this planning application

#### **- Traffic Volumes**

11,000 homes could add in the order of 19,800 cars to the local roads (published figures show that households with more than one car have increased by 8% over the last year).

The impact of such a number of cars, looking to gain access to the A41, the Industrial Estate and the movement of cars on school runs would cause severe traffic congestion around Warners End, along the Leighton Buzzard Road and down Northridge Way in to Boxmoor.

If surveys were made at peak times along Fishery Road, it would be seen that traffic backs up along the whole length of Fishery Road and back along Northridge Way

and St Johns Road. The traffic in London Road around the station is at a standstill for long periods of time. Large increases in traffic volumes will grid lock the surrounding areas of Chaulden, Boxmoor and Hemel Hempstead.

- Foul Sewerage Water

Thames Water who have stated "that the existing sewerage networks adjacent to the site do not have sufficient capacity to cater for a large development (maximum of 100 units)".

Local planners need to take this into account.

The trunk sewer through Gadebridge Park shows capacity problems, the system regularly blowing off manhole covers.

Is this what is planned for the Chaulden area.

Any cost to upgrade trunk sewers would typically be passed on to the local community.

- Surface Water

The area of Fields End farm, which will be built on, absorbs a lot of surface water. Covering this area completely with housing will create many problems of flooding as surface water will find its way down to the valley bottom.

- Schools

What assessments have been made on what the impact will be on schools, due to the obvious rise there will be on children requiring places in local schools.

**Neighbour 35**

**OBJECTION**

This proposal represents a significant and negative departure from previously stated plans. Issues I have with it include -

1. Lack of initial provision of infrastructure services (school, doctor) that will drive increased pressure on existing services to detriment of existing residents.
2. Huge increase in traffic to roads in surrounding area, with impact on local residents trying to get onto these roads and clear out of surrounding areas to work locations.
3. Unacceptable use of Chaulden Lane, with increased traffic that will make pedestrian use even more hazardous than it currently is.... further use as a 'rat-run' will create additional traffic back-ups and safety issues.
4. Plan is uncoordinated with other large scale housing proposals in area (Button demolition) that will further compound points above.
5. Unprecedented demand on sewerage system - something that struggles at this point in time and has previously caused issues in Chaulden Lane area.

All of these points are further compounded by the proposed increase in number of houses. This represents a creeping scope of deployment whose only intent is to generate profit for the house builders at the expense of existing residents and the local community.

### **Neighbour 36**

#### **OBJECTION**

My family home is in Chaulden. Backing onto back field, the Chaulden lane side of road.

I have lived and grown up in the area. It was a lovely place to grow up, rural, safe and we had plenty of areas to keep healthy giving us freedom while young family members.

Unfortunately Bourne Valley School was then closed and a housing estate was built. These builds are taking the character and rural environment away.

We attended meeting re LA3 in Warners End community centre on February 10th.

The issues listed that are concerns and highlighted objections with reference to the LA3 development:

Phase 1 - 350 properties being built with no GP service (Parkview not taking people at the moment, so what will happen with at least 700 people with no GP). They will not have school, local hospital and local shops. The shops for example are packed at this stage before anything is built!

The increase in properties built. What is going to happen reference parking and the increase in traffic within the local areas of Warners End, Chaulden and Potten End

Very concerned about the changes and development at Chaulden Lane. This is a very rural country lane. Why enlarge the lane to a road, with increased traffic including travellers' vehicles and building access for the pumping station I am sure this will not be rural country lane access! Why is it being built here and changing the country lane environment when it is a beautiful area that was linked to historical canal access surrounded by beautiful green belt area (before status changed) within scenic Hemel Hempstead etc.

A historical highlight of Hemel being ruined.

Who will be in charge of the travellers' site? I know of people near Cherry tree site who had to have quick alarm response for the police due to issues caused eg. Electric being cut off and other issues for the house owners situated by the travellers' site.

Access for phase 1 development seems to have no road improvements for the amount of vehicles and the access for emergency vehicles I suspect could be a problem. It appears that only Chaulden Lane will be widened.

There is a path into field from Musk Hill. Please could we be advised as to what the plans are around this area, either side of Musk Hill? We would really appreciate it as we are extremely concerned to know about these plans/stages.

When and where will the next stage take place and the future stages?

### **Neighbour 37**

#### **OBJECTION**

Impact to Footpaths / Green corridors

According to the definitive map - three footpaths 90, 91 and 21 are adjacent to the proposal site. Access routes to the site that have been proposed by the developer

will cross several of these footpaths with busy roads. These footpaths are well used and enjoyed by the local community.

They are also wildlife corridors between green spaces and need to be protected. What measure are being proposed to protect these footpaths and wildlife corridors?

Please advise what provisions are being made to protect the wildlife that live there and use the corridors and exactly how much of a green corridor will remain?

I would like the exact measurements of how close the development will be to each of the footpaths?

I would like to be assured that there are tree preservations in place especially for the oak tree, which stands in the field by itself, and for the ancient woodland that borders most of the fields?

The Development is a huge loss of green space, which is enjoyed by many people and by building on this land; you will be destroying many wildlife habitats, which in itself is very upsetting.

#### Unwanted and un-needed Development

The application is on green belt land and no reason has been provided to justify the need to build on it. There are several developments proposed and in progress in Hemel, please provide proof that this development is needed in addition to all of the other development?

Dacorum BCs Authority Monitoring Report for 2016-17 states targets for building of residential dwellings have been exceeded.

Please advise and provide proof that such a large development is needed?

The Core Strategy Documents produced by Dacorum BC are out of date and not a true reflection on the needs of the community. Therefore, if the assessment tool used to determine the application are out of date how can the application be considered?

The Local Plan 1991 -2006 adopted in 2004 are similarly out of date and not a true reflection on the needs of community. Therefore, if the assessment tool used to determine the application is out of date, how can the application be considered?

The Local Allocation Plan 3 appears to have been produced in conjunction with only one developer. This would suggest that the application would not be judged fairly as there is already an agreement in place with said developer. An independent developer should be asked to review the plan to ensure that the development is in the best interests of the community and environment and if necessary rewrite the LA3 Plan.



The development reduces the availability of local arable land for farming and food production. How is this going to be addressed?

#### Impact on the Community and environment

The local community does not want the development; I feel that we are just not being listened to are having this unneeded development forced upon us, regardless of the impact on the community and environment.

The development will have a significant impact on existing residents especially those who live close by, how do you propose to ease the burden on those affected and how do you propose to compensate those that are impacted by the ongoing noise and travel chaos that will undoubtedly ensue?

What provisions will be made for parking onsite so that local roads are not made to suffer further by workers parking in nearby roads ?

#### Surface Water and Impact on Biodiversity

The application includes the construction of several large lakes with the intention of slowing the surface water as it travels across the proposed site. No detail is available on to the construction or maintenance of the lakes. Lakes such as this will be effective at slowing surface water flow across the site but it is appropriate to know the design, construction, depth, design of the edges how the ponds will be managed to ensure they are healthy and the safety of the residents, particularly young children especially close to the primary school and the well-used adventure playground. This needs to be provided

Until this information is provided in full we believe this is contrary to Policy CS29 on 'Sustainable Design and Construction in that the proposals for surface water drainage are insufficient.

The drainage ditch shown on drawing 16-21-1005 and other in that series appears to be a straight featureless design. It does not include meanders to slow the flow of surface water, or increase the bio-diversity. Once again this is contrary to Planning Policy CS29 on 'Sustainable Design and Construction' and therefore the application should be refused.

We note the use of Porous pavement in drawing 16-21-1005 and others in that series but no detail is provided to ensure the provision of porous pavement remains in place in the long term or on future built parking area to maintain the run off figure provided in the calculations. As no details have been provided on how this will be done then this application should be refused.

Planning Policy CS29 on 'Sustainable Design and Construction', states that;

- "New development will comply with the highest standards of sustainable design and construction possible. With regard to flood risk and drainage, the following principles should normally be satisfied:

- Provide an adequate means of water supply, surface water and foul drainage;

- Minimise impacts on biodiversity and incorporate positive measures to support wildlife;

- Minimise impermeable surfaces around the curtilage of buildings and in new street design"

Unfortunately, the proposals will inevitably have a negative impact on biodiversity as the footpaths will be surrounded by houses on either side and they will cease to be wildlife corridors. They will also reduce the local wildlife value significantly and diversity. In order to overcome this the developer should be asked to provide a significant buffer around the footpaths to maintain their amenity and wildlife value. As this has not been provided, the application should be refused.

#### Misleading application

The application is misleading suggesting a modest development of around 350 properties, but in fact includes a clause to build over 1100 residential properties, schools, lakes, traveller sites, doctors, shops etc.

This honestly feels like the Council and developers are being greedy and cramming in further houses regardless of the impact. Please justify the need for the extra houses, from the original 900 to now the 1100?

#### Cost to the Community

The application includes proposals to widen roads, make new access points, close roads, install new sewers and build roads across footpaths. This will surely increase the costs of road maintenance, require air quality monitoring and place additional burden on local amenities to name just a few. These costs are felt by the local community in the form of increased rates or a drop in service provision by the local council. We request that Dacorum BC fully explore the additional costs that this significant development will place on them and we ask that measures be put in place to recover all of the costs they incur either via a CIL or a Section 106 agreement for the life of the development. As no application has been provided by the applicant then this application should be refused.

#### Comments following reconsultation

I strongly Object to Planning Application 4/03266/18/MFA for reasons set out below.

in addition to my original objections:

I strongly disapprove of the way in which the land at LA3 was withdrawn from the green belt,

The additional documents submitted by the developers and issued for consultation in July 2019 still do not in any way address the questions originally raised by residents of the area surrounding the LA3 site, questions which were asked in the initial consultation.

#### Original objections

I wish to OBJECT to the planning application for the following reasons:

#### Impact to Footpaths / Green corridors

According to the definitive map - three footpaths 90, 91 and 21 are adjacent to the proposal site. Access routes to the site that have been proposed by the developer will cross several of these footpaths with busy roads. These footpaths are well used and enjoyed by the local community.

They are also wildlife corridors between green spaces and need to be protected. What measure are being proposed to protect these footpaths and wildlife corridors?

Please advise what provisions are being made to protect the wildlife that live there and use the corridors and exactly how much of a green corridor will remain?

I would like the exact measurements of how close the development will be to each of the footpaths?

I would like to be assured that there are tree preservations in place especially for the oak tree, which stands in the field by itself, and for the ancient woodland that borders most of the fields?

The Development is a huge loss of green space, which is enjoyed by many people and by building on this land; you will be destroying many wildlife habitats, which in itself is very upsetting.

#### Unwanted and un-needed Development

The application is on green belt land and no reason has been provided to justify the need to build on it. There are several developments proposed and in progress in Hemel, please provide proof that this development is needed in addition to all of the other development?

Dacorum BCs Authority Monitoring Report for 2016-17 states targets for building of residential dwellings have been exceeded.

Please advise and provide proof that such a large development is needed?

The Core Strategy Documents produced by Dacorum BC are out of date and not a true reflection on the needs of the community. Therefore, if the assessment tool used to determine the application are out of date how can the application be considered?

The Local Plan 1991 -2006 adopted in 2004 are similarly out of date and not a true reflection on the needs of community. Therefore, if the assessment tool used to determine the application is out of date, how can the application be considered?

The Local Allocation Plan 3 appears to have been produced in conjunction with only one developer. This would suggest that the application would not be judged fairly as there is already an agreement in place with said developer. An independent developer should be asked to review the plan to ensure that the development is in the best interests of the community and environment and if necessary rewrite the LA3 Plan.

The development reduces the availability of local arable land for farming and food production. How is this going to be addressed?

Impact on the Community and environment

The local community does not want the development; I feel that we are just not being listened to are having this unneeded development forced upon us, regardless of the impact on the community and environment.

The development will have a significant impact on existing residents especially those who live close by, how do you propose to ease the burden on those affected and how do you propose to compensate those that are impacted by the ongoing noise and travel chaos that will undoubtedly ensue?

What provisions will be made for parking onsite so that local roads are not made to suffer further by workers parking in nearby roads ?

### Surface Water and Impact on Biodiversity

The application includes the construction of several large lakes with the intention of slowing the surface water as it travels across the proposed site. No detail is available on to the construction or maintenance of the lakes. Lakes such as this will be effective at slowing surface water flow across the site but it is appropriate to know the design, construction, depth, design of the edges how the ponds will be managed to ensure they are healthy and the safety of the residents, particularly young children especially close to the primary school and the well-used adventure playground. This needs to be provided

Until this information is provided in full we believe this is contrary to Policy CS29 on 'Sustainable Design and Construction in that the proposals for surface water drainage are insufficient.

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Unfortunately, the proposals will inevitably have a negative impact on biodiversity as the footpaths will be surrounded by houses on either side and they will cease to be wildlife corridors. They will also reduce the local wildlife value significantly and diversity. In order to overcome this the developer should be asked to provide a significant buffer around the footpaths to maintain their amenity and wildlife value. As this has not been provided, the application should be refused.

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## **Neighbour 38**

### OBJECTION

There has been a lack of notice to householders in the area from the council re the development especially re the increase in proposed houses from 900 to 1100. The consultation period is inordinately short bearing in mind the number of documents to review and the amount of time the developer has taken to produce these documents. In addition the documents (especially mitigating items) are based on out of date data and incorrect assumptions. The increase in traffic in the area (and some of the mitigating items) will result in safety issues.

I have the following comments/questions/ on the documents:

Fields End is a no open fire zone due to wooden cladding. Is the new development, especially the first tranche of development going to be designated as a no open fire zone? In addition, during the initial construction are the developers going to be banned from burning refuse etc.?

Transport assessment is out of date. Specifically mentions No 3 bus route as having 3-4 buses per hour during the day. This has been 2 per hour for over a year. Also refers to ML1 bus and refers to bus transport to the industrial estate via the ML1. Currently, there are very few services after 6.00pm from the station to The Avenue. If the bus companies were to increase the service (at a time when services are being reduced nationwide because of a reduction in council subsidies) it would take a huge commitment on their part and would involve a considerable amount of subsidies from the developer/council. Is this likely to happen on the scale that would be required?

Transport assessment refers to trip rates from 8-9am and 5-6pm. These are the wrong time to assess trip rates - "rush hour" for commuters to London in Hemel is 7-8am and 6-7pm - both by rail and by road. The times used in the assessment may be more appropriate for school traffic and commuters to industrial estate. Travel to and from A41 and Hemel station needs to be factored into the calculations. Majority of tenants in Fields End use the station and A41.

Also states that site visit to Hemel Station to assess capacity for cycle spaces was undertaken on Friday 18/11/16 stating weather was warm and sunny. November is not an ideal time to assess this as fair weather cyclists will have taken the car and Friday is definitely not a good time as most popular day for spending evening in

London and those commuters will definitely not be cycling. If reliance is to be placed on this it needs to be reworked.

Mentions that Pouchen End Lane is a "good route for cycling". Cyclist on a single track road with car trying to pass is tantamount to disaster for the cyclist. Pouchen End Lane is likely to become more used with the additional traffic finding shortcuts to the A41 especially as this is the preferred route on Satnav to get to Fields End.

Parking spaces - the number of these would appear to be very low. I note that the number of spaces per type of property has been agreed with DBC. One space each for flats and 2 bed houses is insufficient - majority of 1 and 2 bed houses in Fields End have 2 cars with only one allocated parking space. This will lead to people parking on the roads/pavements thus creating a danger of emergency vehicles being unable to have access.

Improvements to road junctions in area - appreciate a lot of work seems to have gone into this. However, re the junction of Boxted Road/Long Chaulden/Warners End Road the plan would appear to reduce the size of the pavements to incorporate 2 lanes around the junction. This junction is close to a primary school and is a major route for secondary pupils walking to school. It would appear that traffic may flow easier but, at the same time, have made it more unsafe for children.

Also there is no account taken or provided for the increased traffic down Galley Hill - the site of another primary school. This major route to the industrial estate should be taken into account.

Deep bore soakaways (25m down) - will this water "soak away" into the canal (i.e. the lowest point) thus increasing the flood risk along junctions adjoining the A4251? Will these soakaways result in an increased risk of subsidence in the area?

Flood Risk Assessment - if you are concreting over grassland there will inevitably be an increased amount of water draining down the hill. Appreciate that there is a "flood risk assessment" but, given the amount of concreting that will be involved, the amount of flood water that currently accrues at the junction of Fishery Road and London Road and the proposed development to that junction (which will involve more concreting) will this not lead to London Road becoming impassable at times of high rainfall? Should the measures proposed by the developer to mitigate this risk not be independently assessed by DBC?



All of the proposed items to mitigate risks from flooding, improve traffic flows, etc. have been prepared independently of other proposed developments in Dacorum and the surrounding areas. Should DBC not combine all of the proposals from developments in the area and consider these together? (Note that Highways England have stated that there is no need for improvement to junctions to roads governed by them for THIS development based on Trip rates which, as mentioned earlier, do not appear to take account of peak period traffic joining their roads.

In addition should DBC not liaise with other councils in the area (St Albans, Watford and Hertsmere) and present a global effect of all proposed developments?

Affordability homes percentage - for first phase is 35%. Was lead to believe this was to be 40%. Will this percentage be increased in the next phase?

Note the community centre, shop, school etc. are going to be built in the next phase. Is there a guarantee from the developer that this will actually happen? (In the original Fields End development a community centre of sorts was included in the plans but did not happen due to overrunning construction time).

#### Comments following reconsultation

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Note the community centre, shop, school etc. are going to be built in the next phase. Is there a guarantee from the developer that this will actually happen? (In the original Fields End development a community centre of sorts was included in the plans but did not happen due to overrunning construction time).

Perception that developers intend to build more than the 1100 homes from previous documents (certainly more than the 900 homes as previously advised by Dacorum Borough Council;

Perception that developers intend for there to be segregation in the development ("private streets");

Traffic congestion as a result of this development and other developments in the surrounding areas (note that Highways Hertfordshire recommends denying planning permission on this point);

Potential for increased flooding as a result of this development.

#### Comments on recent documents

In the original application the plan stated building a medical facility of up to 100 square metres. The current document now states "Opportunity for Community Building/retail/care home/nursery/apartments." As it now stated "opportunity" and "apartments" this probably means that the developers intend to build apartments rather than the majority of the community hub as originally specified - which would take the number of homes above 1100. What is actually going to be built? (It should be noted that a community centre was proposed in the original application for Fields End - which was never built.)

In the "Urban Design Framework" documents it mentions for SD03.05 "Private streets." Does this mean there is to be segregation in the new development?

The majority of the comments re the original application were around future traffic congestion. The developers have stated they will include cycle paths and walkways within the development and linking with the existing area. The developers' response to reducing traffic congestion is to reduce the width of pavements at key junctions and add new lanes for cars - thus reducing space on the roads and making it more dangerous for cycles. Not sure if this is an oxymoron or a paradox - but 1100 homes will lead to a least 2200 additional cars at some point during the day and this will create gridlock in the area (and probably more so as the traffic assessments from the developer - albeit out of date - do not include other proposed developments in the area (Winkwell, London Road, Boxted Road, etc).

Other than traffic my main concern is in regards to water drainage and the potential for flooding in the area. I am aware of previous flooding in Larkspur Close in Fields End due to issues in the farmland in the area above. All of the documents provided by the developer point to there being no perceived issue. However, being that this is on green belt land and the previous issues with flooding on London Road and the area around the canal (at the bottom of the hill), I would have thought that it would be in the council's best interest to have a separate independent assessment performed of the potential for flooding rather than rely on the developers choice of assessment

company. If you get this wrong I very much doubt you will be allowed to develop to such an extensive area in the future.

Also concerning me is that in the original documents it stated that the development was to take between 8-10 years - now this is more than 10 years. Is this going to drag on further???

In addition to the above I would like to point out that my confidence in DBC's planning department to deal with this satisfactorily and dealing with residents' concerns is dwindling fast. This is as a result of:

Lack of communication - other than original notification of 900 homes to be built have heard nothing since from the council;

No perceived effort to allay residents' fears/worries - comments on previous documents not addressed;

It is perceived that the development is going to go ahead no matter what - documents are up for consultation which includes a note from Highways Hertfordshire recommending that the council denies planning permission;

Do not seem to care about residents - non user friendly website due to documents all having the same name (e.g. proposed plan) and website being down for "maintenance" at a time of asking for comments on such large development (implies doing one's best to deny residents the opportunity to comment.

### **Neighbour 39**

#### **OBJECTION**

We are concerned about the following aspects of the planning application, which variously seem contrary to both National, County and Dacorum planning policy

#### **1. INCREASE IN NUMBER OF HOUSES**

The LA3 Core Strategy Extract in the Master Plan refers to "up to 900 new homes". The clear implication is that it would be 900 homes at most with the possibility of it being fewer. This was for the whole of the LA3 site, including the Herts County

Council parcel of land (aka "Horses' field") for which a consultation for 32 houses was recently put forward by HCC.

Now this Planning Application is for 1100 homes plus a residential care home, excluding the HCC site. In effect 1132 houses plus a care home - more if the higher densities evident in the developers' plan are applied to the HCC site. I note here a suggestion of 4 storey housing (contrary to the 2 storey max in the consultation) in the central area, doubtless to facilitate the increased density.

Further, there is an area marked "2FE SCHOOL LAND/FUTURE RESIDENTIAL", implying that there is potential to forego education in favour of yet more houses.

This is all of non-compliant with the core strategy, disingenuous and undemocratic. Residents have always been concerned at the impact of 900 new homes and to increase this to at very least 1132 at this late stage is insulting. The developers may well be being over-optimistic in order to negotiate a 'compromise' at a lower number, but one that could well exceed the original 900. No compromise is required when there was a bona-fide consultation process.

Notwithstanding the knock-on effect on traffic as set out below, I am concerned that an increase in number of homes goes against the LA3 Core Strategy principle of "The layout, design, density and landscaping must create a soft edge to the Green Belt and the extended open space."

#### ECO Housing

The Core Strategy committed to Sustainable housing (Sustainable Home code 6) including roof lines so that solar panels can be installed on the roofs with maximum effectiveness, the panels to be fitted by the developers to avoid the extra costs of retro-fitting, Installing charging points for electric cars at all houses with parking spaces, where possible use locally sourced and low carbon materials during the construction and incorporate District Heating, Combined Heating and Power, or Heat pumps in homes and community buildings, in line with the most efficient technology available at the time of construction. None of these are mentioned in the Planning Application.

## 2. TRAFFIC - CONGESTION AND ROAD SAFETY

Previous traffic studies (Jacobs report) pointed for the original 900 dwellings, "We have run the 2031 scenario with full-demand i.e. with 100% of the expected trips. This scenario became very congested within both the AM and PM peak hours. As such, we were unable to complete model runs for either period. The full demand scenario has been discussed as far as possible but given the level of congestion and the curtailment of the model runs due to gridlock we feel that taking forward this scenario for further testing would be impracticable. On the basis of the modelled assumptions to date, this indicates that the current road network would be unable to cope with the full level of proposed development."

An as-yet-unjustified and thus seemingly arbitrary reduction of 15% of numbers (equivalent to 765 homes) was required to make the model work as well as the series of road 'improvement' measures being proposed. The Planning Application with a minimum increase of 26% on the 900 homes to a minimum 1132 with the same level of minor alterations to the existing road network, is effectively 48% more than the road network can sustain - a clear risk of gridlocking the already congested roads of Hemel Hempstead with the attendant road safety issues.

The assumptions about increased traffic - number of cars, number and timing of extra journeys - need to be critically assessed. Additionally, the timing of the proposed changes to road layouts needs to be assessed to ensure the timing reflects the increasing traffic as the LA3 phases are delivered.

I not believe that these matters are being correctly assessed at present and that an independent analysis is urgently required.

## RURAL ROADS

The hitherto greenbelt area of LA3 has been declassified, on the strict understanding that there should be no further impact on the surrounding greenbelt with protection of the rural environment beyond.

However, we note:

- i) An increase in the dwelling numbers of LA3 to 1100 plus, with no control over use of the rural roads, especially Chaulden Lane and Pouchen End Lane/Winkwell, as a "rat run"
- ii) Proposals to widen rural Chaulden Lane

Hertfordshire Highways have stated:

"Chaulden Lane is definitely rural in character west of number 167 (just outside the speed limit change). It is narrow (one vehicle wide) with no footways and heavy undergrowth/ hedge on both sides....."

"The Stomor report 'Means of Access and Transport Appraisal' opines:

'Chaulden Lane is "Country Lane" in nature and is not considered suitable for vehicular access to the site. This road is narrow, has poor visibility and no associated footways where it abuts the site"

## OBJECTION

Therefore the overall development in addition to the emergency access and G&T site/pumping station access onto Chaulden Lane, contravene the following policies:

County Council policy on rural roads states

### 3.8 Development Control

G. Resist development where:

- i. The proposals would increase the risk of accidents or endanger the safety of road or rights of way users.
- ii. The proposals would cause or add significantly to road congestion, especially at peak travel times.
- iii. The proposals would generate a significant change in the amount or type of traffic using local or rural roads or rights of way.
- iv. The proposals would either significantly affect the rural or residential character of a road or right of way, or would significantly affect safety on rural or local roads or rights of way especially amongst vulnerable users, or would be located by a poorly designed road.

### 3.20 Road Hierarchy and Network Development

#### Rural Roads

Developments on Rural Local Distributor and Access Roads which would generate a change in the amount or type of traffic will be resisted in the following circumstances:

- o Where there is an increased risk of accidents;
- o Where the road is poor in terms of width, alignment and/or structural condition;
- o Where increased traffic would have an adverse effect on the local environment either to the rural character of the road or residential properties alongside it.

### 3.21 Rural Transport

The county council's approach to rural transport policy is detailed in a Rural Strategy that sets out its aspirations for rural transport though this is to be read in conjunction with the county's other strategies, such as the Bus Strategy and Rights of Way Improvement Plan, and the other policies in this document. The Strategy takes account of the most recent Government guidance on rural issues<sup>7</sup> which presently means the key themes are; to provide local services; a stronger role for communities; recognise the importance of the car; provide quality passenger transport and coordinate services; improve rural road safety; reduce the impact of traffic in rural areas and encourage cycling and walking.



### 3.25 Sustainable Distribution And Freight

" Resist applications for new operators licences involving property served off the rural road network.

That being the case, there can be no case to issue new licenses for HGVs to service the construction sites or to serve the G&T and sewage pumping sites.

### 3. "POTENTIAL" or "PROPOSED" GYPSY & TRAVELLER SITE

The emotive issue of the "proposed" or "potential" G&T site has been ducked by the planning process to date. Whereas Andrew Williams' statement in the Jan 2016 Council meeting that "The location of the Gypsy and Traveller site within the LA3 sites will however be a matter for the independent Inspector to consider when he examines the Council's Site Allocations document." proved erroneous as, in accepting the principle of the housing numbers (including G&T sites) in LA3, she concluded that "Detailed site issues will be considered through the planning application process".

The danger here is that a reluctance to address the matter date, may result in the arbitrary siting of the G&T site in the SW corner of LA3 becoming the default, without any design consideration or options appraisal. The result is a proposal that fails to meet any design principles and will result in a segregated, alienated element of the community.

The siting and design proposals fail to meet National and Local Policies as follows:

PLANNING POLICY FOR TRAVELLER SITES (DCLG, AUGUST 2015):

POLICY A - Using evidence, 7 a) Pay particular attention to early and effective community engagement with both settled and traveller communities

COMMENT: While the 2006 and 2008 consultations were supported with a detailed report, the CS/LA3 consultation has been generic; with the "potential location" for the traveller site now being presented as a foregone conclusion without any apparent design or sustainability review. the developers' response to issues raised in their 'Statement of Community Engagement' (p15) is nebulous: A footpath through the barricades does not constitute integration. Conversely, locating the sewage pumping station adjacent to the G&T site is an insult.

POLICY B - Plan Making,

- 10 a) Identify and update annually, a supply of specific deliverable sites
- 10 b) Identify a supply of specific, developable sites or broad locations for growth
- 10 c) Consider production of joint development plans that set targets on a cross-authority basis
- 10 d) Relate the number of pitches or plots to the surrounding population
- 13 Ensure that sites are sustainable economically, socially and environmentally

and

Dacorum Core Strategy, POLICY CS22,

New Sites will be:

(b) Located close to facilities

(e) designed to a high standard with: (i) an open frontage similar to other forms of housing; and (ii) landscaping or other physical features to provide an appropriate setting and relationship to existing residential areas.

Any new transit pitches should also:

(a) achieve good access to the M1 or A41 main roads;

COMMENTS (including those relevant to the Good Practice Guidance cited by the developers)

There has been no update on the supply of deliverable sites since 2008, providing no 'proportionate evidence' in favour of the Traveller sites on LA3 nor options should a compliant location on LA3 not be deliverable. This is delinquent on the part of DBC. The 2008 study provides a dated but detailed appraisal by comparison to the broad proposals in the Las, with no obvious evidence of joint plans. As currently proposed, the hamlet of Winkwell is the relevant population, which is dominated by the G&T sites.

The proposed site is marginalised at the lowest most South Westerly corner of the site, with main egress South away from the main development and minimal physical linkages to the main site and amenities. It is the furthest point from local services; as the crow flies 600m uphill on foot and a circuitous route of 2.7km via the minor road and already strained infrastructure of Chaulden Lane, a "Rural Lane" (see also Transport comments above). The proposed site is only 600 metres from an A41

junction but only via minor rural roads with specific weight and width constraints; in particular, over canal bridges which are notorious bottle necks including the unreliable swing bridge which is narrow and has a weight limit. The proposed site seems designed to turn its back on the community and vice versa. The location is too far to walk (especially if in need of healthcare) and the lack of internal road linkages necessitate a circuitous drive. There is no convenient bus route. The London - Manchester mainline is less than 100m away from the proposed site, a significant health & safety and environmental (noise) risk. The site as proposed is exposed to the prevailing wind from the SW

The developer proposals provide for a segregated, not integrated, facility which does not meet these policies or standards in any way.

#### 4. Schools, Health, Infrastructure

The LA3 Core Strategy states that LA3 will deliver "shop, doctors surgery, and additional social and community provision, including a new primary school;"

There is only provision for such facilities in the planning application with a suggestion of more homes over educational space (see Housing comments above)

The masterplan and Phase 1 must commit to a timely and proportionate delivery of these facilities by the developers.

Evidence must also be produced by an accountable (and liable) party that the water, sewage and power utilities can cope with the increased demand.

#### 5. Air pollution and noise

We are concerned about the air pollution and noise both during construction and from the increased traffic levels once the new development is concluded. We would urge the council to ensure that the developer monitor both carefully and take necessary actions.

### **Neighbour 40**

#### OBJECTION

The number of houses seems very high for the space.

The original number 900 would be more reasonable.

There is no significant green space, for example to walk dogs.

Due to the extra traffic, Northridge Way needs another zebra crossing about half way, near Green End Road or Ashtree Way. At present there are crossings near each junction of Long Chaulden. These are 700m apart, which leaves a large section

in the middle that is currently very hard to cross. Lots of children cross Northridge Way to attend secondary school (the catchment for Hemel School including the area to the West of Northridge Way). With increased traffic it will be almost impossible to cross the road at peak times.

Access to the travellers site from Chaulden Lane isn't a good idea. The lane (even with extra passing places) and Winkwell bridge can't handle any more traffic. Rather than treating this area like second class citizens, why not just join it to the main development?

### **Neighbour 41**

#### **OBJECTION**

I am unhappy about the traveller site in the proposed location I am also concerned with the proposal to place a foul water wasted facility on the border with my land. The developer has sited these facilities at the furthest point from their initial development and I feel they have not only not considered the existing community, they are also recklessly proposing these facilities are as near to the conservation area and green belt as physically possible.

I am objecting to the traveller site in its present position of the basis that it does not comply with the government guidelines for the siting of a gypsy and traveller site and promise to retain the character of country lanes. This will overwhelm the existing community

- The land is a good 2-3 metres above the road level and therefore the hedgerow and land will need to be gouged out to allow safe descent and exit onto a single track lane which partly falls within a conservation area. This will be in addition to the emergency access further along Chaulden Lane leading to the loss of hedgerow and a detriment to the wildlife that live there
- Chaulden Lane is too narrow road for heavy traffic and is already busy. This would mean to loss of a considerable part of the site for an access and be a danger for local traffic
- Caravans and lorries from the site will be passing through the narrow lanes and restricted bridges of the Winkwell and Pixes Lane.
- The proposed area is on a slope
- The proposed site is adjacent to a conservation area
- The proposed site is near a railway
- There is no vehicular access to the main development to allow access to shops, schools and medical facilities and therefore no inclusion.

I am also objecting to the siting of a foul water pumping station on the border with my land as it will be a detriment to the quiet enjoyment of my property. It will also involve an access for heavy vehicles from Chaulden Lane and will be a second exit (the other being the emergency exit onto a lane that the Council promised would have no vehicular access by the LA3 development). This will inevitably change the nature and character of Chaulden Lane.

I totally concur with the comments made on this forum by WHAG. The planners need to think again about their impact on their neighbours.

## **Neighbour 42**

### COMMENT

I wish to comment on the planning application ref 4/03266/18/MFA (LA3)

I do not see how the area will cope with the amount of traffic the site will generate. I do hope it will not be a rat run or cut through between The Avenue and Long Chaulden. The Avenue is a wide road and I suspect traffic will speed along it. Also at present in snowy weather residents at Fields End often have to park along The Avenue because the side roads are no-go areas.

It is currently difficult to park at Warners End shops, with vehicles often queuing into the upper part of Long Chaulden outside the car park and obstructing the traffic there. Similarly it is often difficult or impossible to park at Hemel railway station car park after 10.00 am. This is without any additional vehicles in the area which the development will generate. I do not see how other roads in the area will cope with the increased traffic.

Green areas and paths need to be preserved, and the plans do not seem to show this, with building encroaching on the present footpath at the side of the fields between Long Chaulden and Fields End. It is particularly important to preserve wildlife and for people to be able to enjoy the green areas.

The primary school should be built at the start of the development, and the doctor's surgery also needs sorting out at a similar time. The existing surgery in Warners End will not cope as at present with extra patients and vehicles. All these extra houses are being built in a town which has lost a lot of the hospital facilities and has no A&E, and there are numerous other sites in the town which are also earmarked for housing.

The Care Home is a welcome addition given that there is an ageing population but this needs to be affordable as well as having adequate visitor and staff parking. Some of the housing on the rest of the development also needs to be suitable for the elderly.

### **Neighbour 43**

#### OBJECTION

I very strongly object to this planning application based on the following key points:

1. It does not comply with the Core Strategy of DBC on the number of dwellings to be built.
2. It does not meet the requirements of the Core Strategy on Sustainable and Eco-design (solar panels, car charging points, water usage etc).
3. The modifications proposed to the road infrastructure are grossly inadequate for the additional traffic in the wider area which has already congested roads.
4. Amenities and essential services (school, surgery, shops etc) proposed are inadequate for the new residents and will further stretch the existing services.
5. No details given on Construction Vehicle movement and parking. It is vital during the long construction period, construction vehicles are parked onsite away from the current road network and also have adequate onsite cleaning facilities.

### **Neighbour 44**

#### OBJECTION

I object to this application.

1. Housing numbers & Impact due to (~22%) increase in the number of dwellings

#### 1.1 Numbers:

The maximum of 900 dwellings stated in the Core Strategy, but the application now proposes 1,100 in a reduced area (HCC land excluded in these numbers, thus the final numbers will further increase), and not agreed at any level by Dacorum or its residents, making the green spaces and a soft edge to the green belt almost disappear with such high density development. At the Core Strategy, Site Allocations and Master Plan public consultations, residents have been consulted on 900 dwellings. At no previous stage have local residents been consulted on a higher figure. As a result previous consultations would be effectively voided if a higher

number is now considered and agreed, residents having had no opportunity at any previous stage to consider a higher number.

## 1.2 Traffic:

Previous traffic studies pointed for the original 900 dwellings, "We have run the 2031 scenario with full-demand i.e. with 100% of the expected trips. This scenario became very congested within both the AM and PM peak hours. As such, we were unable to complete model runs for either period. The full demand scenario has been discussed as far as possible but given the level of congestion and the curtailment of the model runs due to gridlock we feel that taking forward this scenario for further testing would be impracticable. On the basis of the modelled assumptions to date, this indicates that the current road network would be unable to cope with the full level of proposed development." The Planning Application with an increase of 22% on the 900 dwellings only indicates minor alterations to the existing road network. A clear case for gridlocking the already congested roads of Hemel Hempstead.

2. The existing road infrastructure outside of LA3 will not cope with increase in traffic numbers for either 900 or especially 1,100 on already congested roads

- o Safety impact to existing residents due to the extra traffic - care needed to ensure that this is not compromised
- o Mitigations proposed by developers are inadequate based upon experience and also based upon the most recent traffic analysis from several years ago. This latter indicated that at 100% based on the extra 900 houses in LA3 there would be gridlock in Hemel Hempstead and a reduction of 15% in traffic was required to allow the model to work. Rather than a reduction of 15%, LA3 is now proposed to have an extra 23% houses. The impact on Hemel will be significant. This does not appear to be recognised in the planning application.
- o The assumptions about increased traffic - number of cars, number and timing of extra journeys - need to be reviewed. I do not believe that these are correctly assessed at present.
- o The timing of the proposed changes to road layouts needs to be before building work starts, before the increasing traffic.
- o Without the community hub, school or GP surgery in phase 1, there will be extra traffic outside of LA3 in the earlier phases, which has not been taken into consideration.
- o The extra traffic generated down Chaulden Lane from the G&T site and servicing the Pumping Station will change the nature of that road, which is defined as a rural road. This will be in conflict with DBC's own policy for not impacting rural roads and as restated by developers themselves in their planning application.

### 3. Negative Impact on Rural Roads

I am particularly concerned about the proposals in respect of the rural roads, notably Chaulden Lane, Pouchen End Lane and Winkwell.

The hitherto greenbelt area of LA3 has been declassified, on the strict understanding that there should be no further impact on the surrounding greenbelt with protection of the rural environment beyond.

However, I note:

- i. An increase in the dwelling numbers of LA3 to 1100 plus, with no control over use of the rural roads, especially Pouchen End Lane/Winkwell, as a "rat run"
- ii. Proposals to widen rural Chaulden Lane

I strongly object to the above for reasons detailed below.

I support the suggestions made in the Design & Access statement to encourage pedestrian and cycle access from LA3 to Pouchen End Lane, via green corridors, but contend that this is simply not possible on grounds of safety, without traffic control measures to limit car usage.

In an additional point of note I consider a cohesive approach is required to review the impact of all developments planned on the local roads. In particular, the 56 dwelling development in Pix Farm Lane will increase the traffic through the rural roads described here.

#### Chaulden Lane

o The eastern end of Chaulden Lane (by the houses and playing fields) is a two way highway, but it is narrow. Where cars are parked only single lane traffic can pass. Houses are cut into the slope meaning that driveways exit directly into the road with poor visibility, and an increase in traffic will render negotiation onto the road even more dangerous than it is now.

o More notably however, the western part of Chaulden Lane, from the houses to Pouchen End Lane, is a narrow, winding, single track rural lane. At the junction with Pouchen End Lane, a hill further reduces visibility and ability to pass. Traffic must take care to avoid collision and often is prevented in its progress due to the single track nature. The road is particularly unsuitable for heavy vehicles.

o Moreover it is especially dangerous to pedestrians/dog walkers and cyclists, who can be pushed into edge/undergrowth to evade collision with a vehicle. This is further exacerbated by the steep banks on the northern edge of this lane. Pavements are not available everywhere on this lane. An added issue is the proximity of the



railway to the south, with a busy train network causing significant noise affecting pedestrians ability to hear approaching traffic.

o Hence any plan that may increase the level of traffic should be avoided.

o I note the plan to widen Chaulden Lane but consider this to be an insult to the local community, by further impacting on the rural area outside of the actual development itself which has already resulted in loss of green belt. This would also mean destroying trees and hedgerows which would increase noise levels even further and destroy habitats for wild life.

o This proposal is against national and local strategy regarding rural roads.

Hertfordshire Highways have stated:

o 'Chaulden Lane is definitely rural in character west of number 167 (just outside the speed limit change). It is narrow (one vehicle wide) with no footways and heavy undergrowth/ hedge on both sides.....'

o The Stomor report 'Means of Access and Transport Appraisal' opines:

'Chaulden Lane is "Country Lane" in nature, and is not considered suitable for vehicular access to the site. This road is narrow, has poor visibility and no associated footways where it abuts the site'

#### Pouchen End Lane and Winkwell

o Pouchen End Lane and Winkwell are again single track, very rural roads that are only suitable for a low volume of smaller vehicles accessing houses and facilities. Pouchen End Lane has particularly poor visibility, due to the high banks on either side as the road winds through.

o Notably at Winkwell, access is via the delightful and old swing bridge with a 3 tonne weight limit, and a small bridge over the River Bulbourne. The swing bridge is obviously important and functional - in summer months it is frequently used by long boats causing further delays to local traffic, with a build up waiting on either side until the bridge reopens.

o Residents and visitors to the area enjoy walking and cycling along these routes and their safety must be paramount. Dog walkers frequently complain about being pinned against the edge to enable a vehicle to pass.

o There is a large car park on Pouchen End Lane opposite the junction with Pix Farm Lane. This is used by walkers and fishermen, as well as visitors to the boat yard and Three Horseshoes pub. The pub is extremely popular and frequented by

many. The walk from the car park to the pub, even at the present time, can be concerning as traffic tries to wend its way through and navigate on-coming vehicles.

o To the south where Pouchen End Lane joins the London Road (A4251) congestion already causes a dangerous situation with traffic reversing onto London Road to clear on-coming vehicles. There are a very limited number of passing spaces which work reasonably well with low volume traffic and local drivers who understand "the etiquette" - not "rat runners" who are not familiar. Accidents have occurred and any proposal that might exacerbate this should be avoided.

o The current situation is that a combination of Pouchen End Lane, Winkwell, Chaulden Lane and/or Pix Farm Lane are used as a "rat run" for traffic from the London Road/A41 through to Hemel Hempstead and from the north via Field End Lane down Pouchen End Lane. This is increased significantly when there are problems on major roads such as the junction at Box Lane and London Road and also when the A41 is closed due to an accident (a regular occurrence). This "rat run" traffic can be fast and dangerous and frequently causes congestion and blockages, especially around Winkwell and the swing bridge. "Road rage" is not uncommon as drivers appear to be unable to work out who should move aside to let on-coming traffic through.

I also draw attention to the Pix Farm Lane development which will lead to additional pedestrians and cyclists (including children) using Pouchen End Lane and Winkwell to access London Road, bus stops and the station. There will be an increase in pedestrian and cycling activity - which is to be welcomed as long as it is safe.

Chaulden Lane is not in any way suitable for construction traffic. It goes without saying that neither is Pouchen End Lane / Winkwell, and this should include construction workers access to work vehicles.

The county council stated that it will "Deter through traffic including rat running from using these roads", "Resist developments which would generate an unacceptable change in the amount or type of traffic."

Hertfordshire County Council Transport Policy Document states (3.8G) The County Council will resist development where:

- i. The proposals would increase the risk of accidents or endanger the safety of road or rights of way users. Such risk exists at the present time and would be exacerbated by any increase in traffic.
- ii. The proposals would cause or add significantly to road congestion, especially at peak travel times. Road congestion, especially at peak times, occurs now.
- iii. The proposals would generate a significant change in the amount or type of traffic using local or rural roads or rights of way. Without controls the volume of traffic using the lanes as a "rat run" would undoubtedly increase, especially from those wishing to access the north of LA3 via Field End Lane and Pouchen End Lane. The location of

the Foul Water pumping station and Travellers site will generate large vehicles not suitable for rural lanes.

iv. The proposals would either significantly affect the rural or residential character of a road or right of way, or would significantly affect safety on rural or local roads or rights of way especially amongst vulnerable users, or would be located by a poorly designed road. This would undoubtedly be the case.

In terms of Road Hierarchy and Network Development (3.20) it is stated that developments on Rural Local Distributor and Access Roads which would generate a change in the amount or type of traffic will be resisted in the following circumstances:

- Where there is an increased risk of accidents;
- Where the road is poor in terms of width, alignment and/or structural condition;
- Where increased traffic would have an adverse effect on the local environment either to the rural character of the road or residential properties alongside it.

All of the above are applicable to the rural lanes bordering LA3 to the west and south.

Additionally at 3.21 we are informed that the county council's approach to rural transport policy, takes into account most recent Government guidance on rural issues which encompasses key themes including to "improve rural road safety"; reduce the impact of traffic in rural areas and encourage cycling and walking." i.e. not to implement strategies that will have a negative effect on rural road safety by increasing traffic (either in volume or size).

At 3.25, under the subject of Sustainable Distribution and Freight, the strategy is to "Resist applications for new operators licences involving property served off the rural road network." How, therefore can this be reconciled with the provision of HGV licenses to service a Foul Water Drainage plant and a G&T site? I contend that it cannot.

In summary,

- I object to any proposals that impact on the safety of walkers, cyclists and the local community, who use the rural roads to access houses and local facilities
- I object to any proposals that exist to alter rural nature of the rural roads
- I am supportive of proposals to reduce traffic, thus improving safety for non-car driving road users
- I am supportive of proposals to reduce traffic, thus improving access and functionality for local vehicle road users

Further references include:

Policy CS2(B) criteria includes the need to:

- Respect local character and landscape context

The Master Plan includes the requirement to:

- Ensure no vehicular access from Pouchen End Lane - however without controls Pouchen End Lane can be accessed from the north and London Road
- Reinforce and enhance the existing structural landscape features adjoining Pouchen End Lane to enable a new, clear and defensible Green Belt boundary to be defined and to reduce further the limited views of the development from the west - what good is this if traffic in the rural roads is increased causing danger and congestion
- Prevent further access onto rural lanes
- Protect the amenities and character of Pouchen End Hamlet
- Maintain the rural character of Pouchen End Lane and Chaulden Lane

#### 4. Proposed Gypsy & Traveller Site

Reference is made to the October 2016 Planning Inspection on Site Allocations and its acceptance of the strategic principle of housing numbers, including G&T sites, as opposed to the planning detail. The April 2017 Site Allocations Main Modifications Report of Representations, MM21, states clearly that "Detailed site issues will be considered through the planning application process". Therefore, many of the concerns raised historically are now germane.

As shown below, the developers' 'Planning Statement' (clause 7.47) that "This masterplan has been produced with reference to relevant Government guidance in the form of Designing Gypsy and Traveller Sites - Good Practice Guide" is fallacious. Further, the developers' response to issues raised in their Statement of Community Engagement' (p15) is nebulous: A footpath through the barricades does not constitute integration. Conversely, locating the sewage pumping station adjacent to the G&T site can only be interpreted as a highly offensive statement as to the social standing of gypsies and travellers.

The siting and design of the proposed G&T site does not accord with national or local policy as follows:

PLANNING POLICY FOR TRAVELLER SITES (DCLG, AUGUST 2015):

POLICY A - Using evidence, 7 a) Pay particular attention to early and effective community engagement with both settled and traveller communities

COMMENT: While the 2006 and 2008 consultations were supported with a detailed report, the CS/LA3 consultation has been generic; with the "potential location" for the traveller site now being presented as a foregone conclusion without any apparent design or sustainability review (DBC Council meeting - January 2016 - Minutes p8, quoting question by Leo Bedford (WHAG) and reply by Andrew Williams:

"The location of the Gypsy and Traveller site within the LA3 sites will however be a matter for the independent Inspector to consider when he examines the Council's Site Allocations document.

The independent inspector DID NOT consider the location of the G&T site within LA3, merely the principle of housing needs within the overall Site Allocations

Policy B - Plan Making, 10 a) Identify and update annually, a supply of specific deliverable sites

COMMENT : No update since 2008, providing no 'proportionate evidence' in favour of the Traveller sites on LA3 nor options should a compliant location on LA3 not be deliverable. This is delinquent on the part of DBC.

POLICY B - Plan Making 10 b) Identify a supply of specific, developable sites or broad locations for growth

COMMENT: The 2008 study provides a dated but detailed appraisal by comparison to the broad proposals in the LAs

POLICY B - Plan Making 10 c) Consider production of joint development plans that set targets on a cross-authority basis

COMMENT: Not seen

POLICY B - Plan Making 10 d) Relate the number of pitches or plots to the surrounding population

COMMENT: As currently proposed, the hamlet of Winkwell is the relevant population

POLICY B - Plan Making 13 Ensure that sites are sustainable economically, socially and environmentally

COMMENTS (including those relevant to the Good Practice Guidance cited by the developers):

The proposed site is marginalised at the lowest most South Westerly corner of the site, with main entrance/exit South away from the main development and minimal physical linkages to the main site and amenities.

It is the furthest point from local services; as the crow flies 600m uphill on foot and a circuitous route of 2.7km via the minor road and already strained infrastructure of Chaulden Lane, a "Rural Lane" (see also comments on lack of compliance with Rural Roads policy)

The proposed site is only 600 metres from an A41 junction but only via minor rural roads with specific weight and width constraints; in particular, over canal bridges which are notorious bottle necks including the unreliable swing bridge which is narrow and has a weight limit

The proposed site seems designed to turn its back on the community and vice versa.

The location is too far to walk (especially if in need of healthcare) and the lack of internal road linkages necessitate a circuitous drive.

There is no convenient bus route

The London - Manchester mainline is less than 100m away from the proposed site, a significant health & safety and environmental (noise) risk

The site as proposed is exposed to the prevailing wind from the SW

POLICY C - Sites in Rural Areas, 14 Local authorities should ensure that the scale of such sites does not dominate the nearest settled community.

COMMENT Given the "potential site" and orientation, the nearest community is the hamlet of Winkwell; the 6 residential properties will be dominated by 7 traveller pitches.

POLICY E: Traveller Sites in Green Belt, 17 Green belt boundaries should be altered only in exceptional circumstances.

COMMENT: The failure to deliver compliant G&T facilities undermines any exceptional circumstances used to justify the alteration of the green belt boundary under the Site Allocations.

DACORUM 'CORE STRATEGY' , 2013

POLICY CS22, New Sites will be:

(b) Located close to facilities

COMMENT: The proposed site is the furthest point from local services in LA3; as the crow flies 600m uphill on foot. The location is too far to walk (especially if in need of healthcare or carrying shopping) There is no planned bus route. The lack of internal road linkage means the alternative is circuitous route of 2.7km via the minor road and already strained infrastructure of Chaulden Lane, a "Rural Lane" (see also comments on lack of compliance with Rural Roads policy)

(e) designed to a high standard with: (i) an open frontage similar to other forms of housing; and (ii) landscaping or other physical features to provide an appropriate setting and relationship to existing residential areas.

COMMENT: The developer proposals provide for a segregated area, akin to apartheid, do not meet these standards in any way.

POLICY CS22 Any new transit pitches should also:

(a) achieve good access to the M1 or A41 main roads; (

COMMENT: The proposed site may only be only 600 metres from an A41 junction but only via minor rural roads with specific weight and width constraints; in particular over canal bridges which are notorious bottle necks including the unreliable swing bridge which is narrow and has a weight limit, roads that are unsuitable for caravans.

b) minimise potential disturbance to adjoining occupiers.

COMMENT As currently proposed, the hamlet of Winkwell is the relevant population which will be dominated by the presence of the G&T site.

5. Amenities for Phase 1 and future phases of development, e.g. Retail, GP Surgery, School, Care Home

o There is nothing included in Phase 1 other than housing, therefore how will existing retail amenities outside of LA3 cope with 350 houses in Phase 1 when they are already unable to cope with existing people and vehicle traffic flow. An already dangerous situation develops daily at the Warners End, Stoneycroft shops, with traffic backed up along Long Chaulden Road blocking one side of this road due to access issues to the existing shopping area.

o What will be the timing of new amenities compared to the development of Phase 1? Phase 1 will generate 350 new properties, therefore in excess of double that number in terms of new residents over a number of years, including children and older residents. Existing local schools and GP surgeries are already over-subscribed. Where will new Phase 1 LA3 residents seek school places or medical facilities if nothing is provided within LA3 as part of Phase 1?

o Commitment MUST be provided that facilities and amenities, including a GP surgery, school & shops are built as part of Phase 1 and not deferred to a later date or Phase. The timing isn't clarified in the plan and therefore could be many years in the future.

6. HCC Land in the southeast corner, below the site identified in the planning application

I am concerned about the piece of land owned by Herts County Council (known to residents as the "Horses' Field") as follows:

o Why is this not included in the Outline Plan?

o In the DBC Core Strategy, the Site Allocations DPD (as adopted 12 July 2017) and the Master Plan document, this land was considered part of the LA3 Site Allocation

(see SADPD Site Allocations Map Book GB/3 - LA3, also p 86 Local Allocation LA3 West Hemel Hempstead.) Plan 2 of the Master Plan area shows the HCC field and is announced in para 3.1 of the Master Plan.

- o This field formed part of the area of land which was considered suitable for the provision of up to 900 new dwellings.

- o Now this land is omitted from the planning application, yet still the number of houses has risen to 1,100.

- o When this land is eventually built on the total number of houses will well exceed the 1,100 now proposed by the developers in this current application.

- o This in turn would exacerbate all of the issues mentioned above, including transport, pressure on school places, on access to health care.

- Another issue has always been access to this site. It must be made clear that any access should be through the LA3 site and not along the existing narrow and congested Chaulden roads.

## **Neighbour 45**

### OBJECTION

We will be directly affected by the LA3 development, considering our home is adjacent to the south west corner and about 50 metres from the proposed locations of the Foul Water Pumping station and the Gypsy and Traveller site.

We have read the WHAG response and concur wholeheartedly. Our response below reiterates some of the points made with additions that are particularly relevant to us.

### Comments on the planning application

#### 1. Housing numbers & Impact due to (~22%) increase in the number of dwellings

##### Numbers:

The original house numbers proposed in the Core Strategy were up to 900 dwellings. We now understand that 1100 are being proposed, excluding any that may be built on the HCC land in the south east of the site. Additionally the Care Home (which we actually support) was not considered in any previous documents or plans and thus an extra 90 residents, their visitors and staff for the home are to be taken into consideration.

We do not believe there has been any consultation regarding this higher figure.



We note that the key map of the site that was sent to residents and shown on the developers' website had a significant green buffer at the perimeter, but maps on the planning site appear to show this has all but disappeared. Any reduction in green buffer to the surrounding land is not acceptable.

Housing developments for the future should surely look and feel and function in a way that promotes physical and mental well being. We would contend that the original house number of 900 was going to result in a high density development, but to increase this number by over 20% (without the HCC land or the land for the care home being taken into consideration) must result in a level of compaction that is not acceptable.

#### Access and parking within the site

Our personal experience of many modern developments is that road access throughout the site is unacceptably narrow, and this dangerous to pedestrians, frustrating in respect of vehicular access, looks dreadful and promotes unhealthy air quality.

We believe the developers have significantly underestimated the number of vehicles that will access the site and that the road network and parking facilities are inadequate.

With regard to residents' vehicles it has been assumed there will be a reduction on the norm and people are encouraged to walk, cycle or use public transport. Firstly there are no guarantees given about public transport; with the gridlock that is likely to occur outside LA3 to the east, buses will struggle to get to their destinations. Whilst cycling and walking may be laudable aims, they are simply not realistic.

Where is the demographic assessment of the proposed population? Undoubtedly in this number there will be many older and disabled people for whom car transportation is essential. We do not consider this part of the population has been considered at all.

For the rest, the convenience of the car, is a paramount need in busy lives, and while some will use more healthy options, history tells us that most will not. We believe more people will look to greener options of electric vehicles for the future, ensuing they maintain their personal independence.

Additionally, home deliveries have increased massively, and such vehicles are commonplace where they were not 10 years ago. This in addition to the usual service vehicles compounds the obvious problems that will ensue.

#### Traffic outside LA3 - impacting on existing residents

Previous traffic studies, when considering a possible 900 homes, have illustrated that "the current road network would be unable to cope with the full level of proposed development." The Planning Application with an increase of 22% on the 900 dwellings only indicates minor alterations to the existing road network. A clear case for gridlocking the already congested roads of Hemel Hempstead.

The existing road infrastructure outside of LA3 will not cope with increase in traffic numbers for either 900 or especially 1,100 on already congested roads.

The assumptions about increased traffic - number of cars, number and timing of extra journeys - need to be critically assessed. We not believe that these are correctly assessed at present.

The timing of the proposed changes to road layouts needs to be critically assessed to ensure the timing reflects the increasing traffic as the LA3 phases are delivered. We believe that these should be earlier than is proposed in the planning application to reflect the increased traffic flows, which, as stated above, we do not believe have been accurately assessed.

Additionally, this needs to take into account traffic related to the construction of the site

## 2. Negative Impact on Rural Roads

As residents of Pouchen End Lane, with direct experience, we are particularly concerned about the proposals in respect of the rural roads, notably Chaulden Lane, Pouchen End Lane and Winkwell.

The hitherto greenbelt area of LA3 has been declassified, on the strict understanding that there should be no further impact on the surrounding greenbelt with protection of the rural environment beyond.

However, we note:

- i) An increase in the dwelling numbers of LA3 to 1100 plus, with no control over use of the rural roads, especially Pouchen End Lane/Winkwell, as a "rat run"
- ii) Proposals to widen rural Chaulden Lane

We strongly object to the above for reasons detailed below.

We support the suggestions made in the Design & Access statement to encourage pedestrian and cycle access from LA3 to Pouchen End Lane, via green corridors, but contend that this is simply not possible on grounds of safety, without traffic control measures to limit car usage.

Moreover, we consider a cohesive approach is required to review the impact of all developments planned on the local roads. In particular, we note the planned 56 dwelling development in Pix Farm Lane will increase the traffic through the rural roads described here.

Chaulden Lane

The western part of Chaulden Lane, from the houses to Pouchen End Lane, is a narrow, winding, single track rural lane. At the junction with Pouchen End Lane, a hill further reduces visibility and ability to pass. Traffic must take care to avoid collision and often is prevented in its progress due to the single track nature. The road is particularly unsuitable for heavy vehicles.

Moreover it is especially dangerous to pedestrians/dog walkers and cyclists, who can be pushed into edge/undergrowth to evade collision with a vehicle. As dog walkers, this has happened to us on many occasions! This is further exacerbated by the steep banks on the northern edge of this lane. An added issue is the proximity of the railway to the south, with a busy train network causing significant noise affecting pedestrians ability to hear approaching traffic.

Hence any plan that may increase the level of traffic should be avoided.

We note the plan to widen Chaulden Lane but consider this to be an insult to the local community, by further impacting on the rural area outside of the actual development itself which has already resulted in loss of green belt. We believe this proposal is against national and local strategy regarding rural roads.

Hertfordshire Highways have stated:

'Chaulden Lane is definitely rural in character west of number 167 (just outside the speed limit change). It is narrow (one vehicle wide) with no footways and heavy undergrowth/ hedge on both sides.....'

The Stomor report 'Means of Access and Transport Appraisal' opines:

'Chaulden Lane is "Country Lane" in nature, and is not considered suitable for vehicular access to the site. This road is narrow, has poor visibility and no associated footways where it abuts the site'

'It would be possible to form an exit from the site to Chaulden Lane, which would enable pedestrians or cyclists to use this road to gain access to the hamlet, Grand Union Canal and the A4251'

Further references are detailed below.

Pouchen End Lane and Winkwell

Pouchen End Lane and Winkwell are again single track, very rural roads that are only suitable for a low volume of smaller vehicles accessing houses and facilities. Pouchen End Lane has particularly poor visibility, due to the high banks on either side as the road winds through. Indeed egressing our own home is very tricky due to poor visibility and at peak times when the "rat run" is happening we have had a number of "near misses"!

Notably at Winkwell, access is via the delightful and old swing bridge with a 3 tonne weight limit, and a small bridge over the River Bulbourne. The swing bridge is obviously important and functional - in summer months it is frequently used by long

boats causing further delays to local traffic, with a build up waiting on either side until the bridge reopens.

Residents and visitors to the area enjoy walking and cycling along these routes and their safety must be paramount. Dog walkers frequently complain about being pinned against the edge to enable a vehicle to pass.

There is a large car park on Pouchen End Lane opposite the junction with Pix Farm Lane. This is used by walkers and fishermen, as well as visitors to the boat yard and Three Horseshoes pub. The pub is extremely popular and frequented by many. The walk from the car park to the pub, even at the present time, can be concerning as traffic tries to wend its way through and navigate on-coming vehicles.

To the south where Pouchen End Lane joins the London Road (A4251) congestion already causes a dangerous situation with traffic reversing onto London Road to clear on-coming vehicles. There are a very limited number of passing spaces which work reasonably well with low volume traffic and local drivers who understand "the etiquette" - not "rat runners" who are not familiar. Accidents have occurred and any proposal that might exacerbate this should be avoided.

The current situation is that a combination of Pouchen End Lane, Winkwell, Chaulden Lane and/or Pix Farm Lane are used as a "rat run" for traffic from the London Road/A41 through to Hemel Hempstead and from the north via Field End Lane down Pouchen End Lane. This is increased significantly when there are problems on major roads such as the junction at Box Lane and London Road and also when the A41 is closed due to an accident (a regular occurrence).

This "rat run" traffic can be fast and dangerous and frequently causes congestion and blockages, especially around Winkwell and the swing bridge. "Road rage" is not uncommon as drivers appear to be unable to work out who should move aside to let on-coming traffic through.

We are also concerned for the Pix Farm Lane development which will lead to additional pedestrians and cyclists (including children) using Pouchen End Lane and Winkwell to access London Road, bus stops and the station. There will be an increase in pedestrian and cycling activity - which is to be welcomed as long as it is safe.

We additionally contend, for all the reasons expressed above, that Chaulden Lane is not in any way suitable for construction traffic. It goes without saying that nor is Pouchen End Lane / Winkwell, and this should include construction workers access to work vehicles.

We note the county council statement that it will develop and maintain strategies for roads within the urban and inter urban network that:

"D On Rural Local Distributor and Access Roads: - Deter through traffic including rat running from using these roads; - Resist developments which would generate an unacceptable change in the amount or type of traffic."

Hertfordshire County Council Transport Policy Document states (3.8G) The County Council will resist development where:

- i) The proposals would increase the risk of accidents or endanger the safety of road or rights of way users. Such risk exists at the present time and would be exacerbated by any increase in traffic.
- ii) The proposals would cause or add significantly to road congestion, especially at peak travel times. Road congestion, especially at peak times, occurs now.
- iii) The proposals would generate a significant change in the amount or type of traffic using local or rural roads or rights of way. Without controls the volume of traffic using the lanes as a "rat run" would undoubtedly increase, especially from those wishing to access the north of LA3 via Field End Lane and Pouchen End Lane. The location of the Foul Water pumping station and Travellers site will generate large vehicles not suitable for rural lanes.
- iv) The proposals would either significantly affect the rural or residential character of a road or right of way, or would significantly affect safety on rural or local roads or rights of way especially amongst vulnerable users, or would be located by a poorly designed road. This would undoubtedly be the case.

In terms of Road Hierarchy and Network Development (3.20) it is stated that developments on Rural Local Distributor and Access Roads which would generate a change in the amount or type of traffic will be resisted in the following circumstances:

- Where there is an increased risk of accidents;
- Where the road is poor in terms of width, alignment and/or structural condition;
- Where increased traffic would have an adverse effect on the local environment either to the rural character of the road or residential properties alongside it.

All of the above are applicable to the rural lanes bordering LA3 to the west and south.

Additionally at 3.21 we are informed that the county council's approach to rural transport policy, takes into account most recent Government guidance on rural issues which encompasses key themes including to "improve rural road safety"; reduce the impact of traffic in rural areas and encourage cycling and walking." i.e. not to implement strategies that will have a negative effect on rural road safety by increasing traffic (either in volume or size).

At 3.25, under the subject of Sustainable Distribution and Freight, the strategy is to "Resist applications for new operators licences involving property served off the rural road network." How, therefore can this be reconciled with the provision of HGV licenses to service a Foul Water Drainage plant and a G&T site? We consider that it cannot.

In summary,

- We object to any proposals that impact on the safety of walkers, cyclists and the local community, who use the rural roads to access houses and local facilities
- We object to any proposals that exist to alter rural nature of the rural roads
- We support proposals to reduce traffic, thus improving safety for non car driving road users
- We support proposals to reduce traffic, thus improving access and functionality for local vehicle road users

Further references include:

Policy CS2(B) criteria includes the need to:

- Respect local character and landscape context

The Master Plan includes the requirement to:

- Ensure no vehicular access from Pouchen End Lane - however without controls Pouchen End Lane can be accessed from the north and London Road
- Reinforce and enhance the existing structural landscape features adjoining Pouchen End Lane to enable a new, clear and defensible Green Belt boundary to be defined and to reduce further the limited views of the development from the west - what good is this if traffic in the rural roads is increased causing danger and congestion
- Prevent further access onto rural lanes
- Protect the amenities and character of Pouchen End Hamlet
- Maintain the rural character of Pouchen End Lane and Chaulden Lane

### 3. Proposed Gypsy & Traveller Site

We concur completely with the very robust statement made by WHAG.

Importantly we note that the siting and design of the proposed G&T site does not accord with national or local policy.

The proposed site is marginalised at the lowest most South Westerly corner of the site, with main egress South away from the main development and minimal physical linkages to the main site and amenities. It is the furthest point from local services

The proposed site is only 600 metres from an A41 junction but only via minor rural roads with specific weight and width constraints; in particular, over canal bridges

which are notorious bottle necks including the unreliable swing bridge which is narrow and has a weight limit

The London - Manchester mainline is less than 100m away from the proposed site, a significant health & safety and environmental (noise) risk

POLICY C - Sites in Rural Areas, 14 Local authorities should ensure that the scale of such sites does not dominate the nearest settled community.

Given the "potential site" and orientation, the nearest community is the hamlet of Winkwell; the 6 residential properties will be dominated by 7 traveller pitches. This is therefore contrary to policy.

DBC own core strategy 2013 (CS22), states that new sites will be "located close to facilities", but the proposed site is the furthest point from local services in LA3.

POLICY CS22 also states any new transit pitches should also achieve good access to the M1 or A41 main roads;

The proposed site may only be only 600 metres from an A41 junction but only via minor rural roads with specific weight and width constraints; in particular over canal bridges which are notorious bottle necks including the unreliable swing bridge which is narrow and has a weight limit

This policy also states potential disturbance to adjoining occupiers should be minimised.

As currently proposed, the hamlet of Winkwell is the relevant population which will be dominated by the presence of the G&T site.

#### 4. Amenities for Phase 1 and future phases of development, e.g. Retail, GP Surgery, School, Care Home

There is nothing included in Phase 1 other than housing, thus existing amenities are expected to cope with a significant increase residents (presumably in the region of 700, assuming an average of 2 per dwelling). This is unacceptable.

#### Comments following reconsultation

We read the recently uploaded documents with interest in the hope that the numerous comments made by us and so many other residents would have been addressed. They have not, in any way, and therefore all comments made in our previously submitted objection remain valid, and we ask that these are now taken into consideration.

This process has been called a consultation - but that is not what it feels like. At this moment in time it feels like DBC are totally ignoring the views of its residents in favour of the developers; surely this is not right at all, and we hope that DBC will now consider its residents' needs and aspirations properly - residents who have

attempted to engage thoughtfully and constructively with the process, despite the inaccessibility of relevant material documents.

We live in the countryside; we chose to live here. We accept that the green belt opposite our house will become a "housing estate" as we accept the need for housing. The core strategy and master plans clearly indicated a barrier to the south and west to ensure no further creep in terms of loss of green belt, and yet the proposals to widen Chaulden Lane remain, resulting in change to the rural nature of the lane and a significant impact on the safety of pedestrians and cyclists, due to increase in traffic (especially large vehicles) that will surely occur - the very thing that modern transport policy is supposed to prevent.

The continued proposal to locate the gypsy and traveller site in the south west corner has not be consulted upon fully and for the many reasons already expressed by us and others, we maintain this is an inappropriate location.

There has been no consultation whatsoever, regarding the location of the foul pumping station; nor are there any plans to inform residents (or anyone) of the specification of such a station in terms of size and function. We make an assumption that it needs to be at the bottom of the site, but it would be appropriate to have this explained properly. The obvious question to ask is why is it not being placed adjacent to the emergency exit onto Chaulden Lane which would avoid the need for widening of Chaulden Lane? Surely this must be consulted upon and a suitable location agreed before the final site design is agreed - once houses or other facilities are planned, the location of this station will be a fait accompli.

In summary, none of our previous comments have been addressed and we refer you to these in terms of our continued strong objections. There is an opportunity for Dacorum BC to be at the forefront of good, modern, healthy development, avoiding the problems of the past caused by overdevelopment and lack of green space and infrastructure. The impact of poor development on both physical and mental well being is huge and will undoubtedly have an adverse impact on public services, and thus a negative impact on the public purse. A primary concern must be to existing residents whose lives should not be adversely affected by development.

#### **Neighbour 46**

##### **OBJECTION**

I am writing to add my concerns to those of the WHAG in respect of the above application.

My particular concerns are regarding the size of the proposed site which is much to big to add to the demands on the already heavily overstretched local resources such as shops, health provisions and other amenities, and the pressure on the surrounding roads and country lanes.

Also, once again this is taking up greenbelt land and thereby reducing the already heavily pressurised land available for the local wildlife.



I appreciate that new housing has to be built but I do not feel this site is appropriate either in location or size. Have all local brownfield sites been utilised yet? Green belt land should not be taken if there are other brownfield sites available.

I would also suggest that with shops closing everywhere it is strange that a decision was made to build a new shopping centre by the industrial area and wonder about the rationale for that decision and why that was not used for housing instead?

### **Neighbour 47**

#### **OBJECTION**

With reference to the above Planning Application, we wish to comment as follows as to why we object to aspects of this huge development and the loss of the green belt land on which it is to be built:

1. We are very concerned that the Planning Application is now for 1100 new dwellings, where the original Planning Application was for 900 dwellings. The density of dwellings will impact not only on the present residents but also impact on the future residents of LA3 in that they will be 'crammed in' on the site with little or no green or recreational areas. The only green space on the development is where a huge gas pipe runs across the site and has only been left because dwellings could not be built on or near it! Little or no provision has been made to 'green' the site and provide habitat and environment for the displaced local flora and fauna.
2. The increase in traffic will greatly affect the local roads, especially Pouchen End Lane, Fields End Lane, Chaulden Lane, The Avenue, Boxted Road and Hollybush Lane. These roads will all become dangerous 'rat runs' with the increased volume of traffic.
3. Chaulden Lane, Fields End Lane and Poulchen End Lane are exactly that 'lanes'. According to Government and Local Authority policy, a designated lane cannot be widened or altered. We cannot see how these small roads will cope with the increased traffic or how the very high bank leading from the Chaulden Lane into the site can accommodate an entrance for the Traveller Site as it cannot be altered, according to Government policy.
4. The Avenue leads directly onto Boxted Road. Boxted Road gets extremely busy in the morning and evening rush hours and there is always congestion at the T-junction at the Top of The World. The Micklem Primary School is situated at this junction and the increase in traffic will be a serious risk to children and parents.
5. Hollybush Lane already is a 'rat run' for people wishing to get down to the Railway Station or the Bypass. John F. Kenney School is situated on Hollybush

Lane and is always congested in the mornings, afternoon and evenings with the school buses, 6th form children's cars and parents dropping and picking up their children. An increase in traffic along Hollybush Lane will greatly increase the risk of a serious accident.

6. With the Martindale School site (Boxted Road) already under construction - 46 dwellings and 19 flats - and a possible 65 plus cars joining Boxted Road an increase in traffic will certainly happen by next year.

7. We understand that the Phase 1 development is for 350 dwellings only and that the rest of the Planning Application - school, doctor's surgery, old people's home etc. will not initially be built. That is 350 new homes and residents without the local infrastructure to accommodate them. The local doctor's surgery in Warners End is already at capacity and has recently had to instigate a 6 month period when they were unable to take on any new patients.

8. A traveller site is proposed to be built with an entrance on Chaulden Lane only. This goes against Government policy that traveller sites must not be situated on the outskirts of developments but must be inclusive and developed within a planned area.

9. Another 56 houses are planned for Pix Farm along the Chaulden Lane/Winkwell area. This again will increase traffic along the Chaulden Lane and impact on the very narrow roads and the Swing Bridge.

10. Another huge development is planned for the Marchmont Fields. This, with LA3,

makes us, as residents, feel as if we are being completely hemmed in with the resultant impact on our quality of life from increased traffic, pollution, noise and loss of green space. All contributing to our mental and physical wellbeing being affected.

We hope you will consider our comments in your deliberations for this planning consent.

### **Neighbour 48**

#### **OBJECTION**

As a long term resident of the area, I am disappointed that our representatives on the local council have once again demonstrated a complete lack of care or consideration for their constituents.

Indeed the LA3 development appears to have been approved by the most inept bunch of individuals that one has to ask the question, do they even understand where the area is and are they aware of the already major problem with congestion caused by vehicles either moving or stationary.....or is it that they just don't care?

There have been many objections and concerns already made against this ill considered scheme, however, as these have already been voiced I shall not repeat them here but state that I thoroughly concur with them.

My major concern is the impact that this is going to have on Fields End as a whole and in particular The Avenue. This road is already often congested with traffic queuing at the roundabout and parked cars the length of the road which cause blind spots to cars pulling out of the side roads and in the last twelve months there have been at least three serious accidents. The additional traffic that this development is going to create, (may I say here that the calculation of 0.5 cars per household as used in the planning is preposterous and fully supports my earlier feelings about our council leaders), can only add to the risk of further incidents and congestion. There is also an added danger to pedestrians as this road can at times already be difficult to cross particularly for the young and elderly.

I also have a major concern for the disruption that is going to be caused by the developers of the site when works commence and would request that their Construction Phase Health and Safety Plan is properly assessed and includes for consideration to 1) A ban on contractors parking anywhere other than within the boundaries of LA3, 2) Restricted deliveries to the site outside of exceptionally busy periods or those that will affect the local residents ie. early morning, rush hour, school times, all weekend and evenings, 3) A vehicular wheel wash and hose down station at the site egress points, 4) Noise restrictions including considerate working hours and use of radios or other music playing devices on site and 5) Consideration for the environment including waste removal, protection of wildlife and trees.

Finally, to allow Phase 1 of this development to proceed prior to all of the proposed infrastructure being completed, school, health centre etc, in an already heavily over populated area would be yet further demonstration of negligence by our council.

### **Neighbour 49**

#### **OBJECTION**

1) 1100 houses compares to 900 originally quoted. Impact this will have on local traffic conditions does not seem to have been adequately factored in

2) No clarification on type, scale or timing of upgrades required to local road and other infrastructure.

3) There seem to be no plans in Phase 1 for any of the amenities ie school; doctor's surgery; care home. What clarity will be required on this before the application is considered ?

4) Why only 35% affordable homes in Phase 1 when earlier presentations indicated closer to 40%. Will any clarity be sought on future commitments to this before the application is considered ?

5) Can a covenant be placed on the affordable housing to prevent it being quickly sold on to those who can easily afford it ?

6) The green corridors seem to have been carved up to make more room for houses. This not only makes the development more cramped but seems to fly in the face of assurances of the developers at their presentations where they made great play of the linked green corridors

7) The HCC land ( ie horse's field ) is not included in the 1,100 houses. What future plans are there for this plot? Excluding this from the application only increases the density for the remaining land. Put another way, I thought the 900 figure included the HCC land.

8) Parkwood Drive Surgery is already under severe pressure. Until recently, there was a moratorium on new patients. This development can only make matters worse. Who has responsibility to respond to this inevitable consequence ? It would seem sensible for the planned new surgery to be incorporated in Phase 1, especially when there are other new developments in the vicinity ie Boxted Road; Marchmont Fields etc which will only increase demand for the services of doctors.

9) Does the Construction Management Plan allow for parking of all contractors' vehicles on the LA3 site and not nearby side roads ?

10) Does the Construction Management Plan allow for all vehicle cleaning to be completed on the LA3 site and not nearby side roads ?

### **Neighbour 50**

OBJECTION

The increased number of dwellings over that originally scoped for is not sustainable in terms of infrastructure, roads are inadequate, routes are unenforceable, water and sewerage responsibilities are transferred to service providers, no one agency has responsibility for ensuring compliance with standards especially with regard to the traveller site, there is no guarantee of health or education provision for this influx of population.

There is no compliance with local plans to protect rural lanes from being rat runs; there is failure to provide a soft edge to the green belt; there is non compliance with national policy on traveller sites such that what is proposed is a segregated site with inappropriate access, separate from the main development and lacking equal access to proposed community facilities with pre-fab dwellings that undermine the traditional way of life of this ethnic group. There is no evidence of how the planning authority can control development in line with public consultations. For example, the environmental standards proposed by the Dacorum Environmental Forum have been removed. The footpaths and green space pay lip service to policy as Chaulden Lane is already unsafe for pedestrians and cyclists and enlarging passing spaces/widening does nothing for safety. The line of the high pressure gas pipe can't be built on anyway and it doesn't help the isolated Shrubbery Common. There is no evidence of compliance with local policy to ensure separation of existing village communities from the urban sprawl that is this proposed development West of Hemel Hempstead.

### **Neighbour 51**

#### **OBJECTION**

I object to this application for the following reasons:

- The increased size of the development, from the original proposal of 900 in the Core Strategy and Site Allocations documents to the 1,100 proposed now. In addition, this does not include the HCC site in the SE corner of the original LA3 site.

The issues flagged below need to be rigorously assessed in the light of (1) the increased number of houses in the application and (2) the future houses that will inevitably be built on the HCC site.

- Environment, housing standards

- o What has been compromised in the creation of these original houses, in terms of house design and quality and green space?

- o The Core Strategy referred to a "gold standard" development in terms of water usage, environment friendliness and sustainability. There is not hint of such features in the application.

- o I note that the application proposes some 4 storey buildings, as opposed to the maximum proposed originally of 2 - 2 ½ [??] storeys. This will spoil the view/outlook from across the valley and for local residents, again against the original Core Strategy etc propositions.

#### - Traffic

o There were doubts about the ability of the local area to cope with the increased traffic as a result of the 900 houses. Indeed, the Jacobs report in 2015 (I believe) indicated that with the extra 900 houses parts of Hemel would become gridlocked and the model traffic needed to be reduced by 15% for it to flow. Instead of reducing houses, the application increases them by over 20%. Herts CC seem to be ignoring this impending disaster.

o There are some improvements proposed to various junctions around Hemel that are intended to alleviate the extra traffic. I doubt that they will be as effective as is intended - "tinkering around the edges rather than addressing the core issue". It is essential that they are made as early as possible in the development to assist with the extra traffic as it comes "on stream".

o In addition to LA3 there are a number of other significant developments in various stages of proposal around Hemel. These include LA1 to the north of Hemel, Pix Farm Lane to the west and various along London Road to the south. There is no evidence of any "joined up" planning for the impact of all of these on the overall traffic in Hemel. It is no use just developing "point" solutions for each proposal individually.

#### - Facilities

- The current application indicates that a number of facilities around the Community Hub will be built, but not in phase 1. The fact that there will be no shops, school or GP surgery from the start means that the existing facilities in the current neighbourhoods will be stretched even further than at present as they are used by the new LA3 residents.

o The current GP surgery at Parkwood Drive has not been able to take new patients for a while.

o The new families will have to drive to the local schools and shops, imposing further traffic journeys, which will not have been factored in the application.

These facilities must be started in Phase 1.

#### - G&T site

- The application includes a G&T site, which is co-located with the new Foul Drainage station that is co-located with it.

o This is "hidden away" in the SW corner of the site (diametrically opposite to Phase 1), behind a hedge, with only a footpath into the main site.

o This is hardly "inclusion" as required in the NPPF/national G&T policy.

o Putting these sites together does not appear to show any respect to the G&T residents/visitors who will be living on the 7 pitches.

#### - Chaulden Lane

o The two sites above will result in additional traffic down Chaulden Lane - most of it likely to be larger than average vehicles. Chaulden Lane is designated as a rural lane and all documents, including the planning application, refer to retaining the character of rural roads. This additional traffic will mean that this is not done.

o In addition, Chaulden Lane is to have some passing places built - this will further encourage traffic down the lane. All of these will change the nature of the lane.

- Land owned by HCC - SE corner of whole LA3 site

- Further to the comments above about the HCC field:

o When will the plans for this be presented?

o How will we be ensured that:

? They will be compliant with the intentions of the original LA3 masterplan designs?

? The additional housing will be considered in assessing the impact of the whole LA3 site?

? Any vehicular access will be from within LA3, rather than from the Chaulden Vale estate as was proposed by HCC in their aborted proposal in early 2018?

- Affordable housing.

o The Core Strategy and Master Plans referred to 40% affordable housing. Phase 1 delivers no more than 35%. It is unlikely that future phases (by different developers to Phase 1) will make up this shortfall.

o It is recognised that it is essential that there are enough houses in LA3 that are affordable to support the overall and existing Hemel/Dacorum communities, not just providing facilities for newcomers moving out of London.

I hope that DBC Planning will fully consider these points and robustly assess the application, its proposals and developer-supplied information to ensure that the proposed application fits in to the original proposals made by DBC in the Core Strategy and Master Plans/Site Allocation Documents.

### Comments following reconsultation

It is disappointing that this further set of documents does provide any additional information that addresses any of the concerns that I have raised previously.

I support the comments made by WHAG.

### **Neighbour 52**

#### OBJECTION

I would like to pass a number of comments on this proposal, as there are a number of significant and impactful changes from the original plan.

- \* The original Core Strategy was for 900 houses, but this application now proposes 1,100 in a reduced area as the HCC land has been excluded. No consultation has been raised about this increased density on a smaller site.
- \* Understanding of what is happening to the HCC land (Horses Field) needs to be fully understood, so that this can not be sold off in the future for housing, causing even more pressure on the local area.
- \* Traffic - there would be a huge increase in traffic to roads in surrounding area, with impact on local residents trying to get onto these roads and clear out of surrounding areas to work locations.
- \* Increased Air pollution due to the volume of additional vehicles, and also stationary vehicles as they queue in the local area.
- \* Safety of children using local roads - additional crossing provisions need to be considered.
- \* Has there been an independent transport study based on the new volume of housing?
- \* Any changes to road network needs to be made in advance of Phase 1 construction works commencing.
- \* Chaulden Lane is deemed as a rural road, and it is unacceptable to have any entrance from the LA3 development onto this road.
- \* There is no provision as part of Phase 1 for doctors or schools within the development, and the existing doctors and schools are both over subscribed at the current time, let alone with additional housing in the area. A level of provision for these facilities within LA3 needs to be included  
as part of Phase 1
- \* What provision is being made at High Schools within Hemel, since this will create the need for 60 additional pupils feeding from any potential Primary school.
- \* Gypsy and traveller sites should be inclusive of the local community, and the current provision under this application, is not inclusive, as they are placed on the bottom corner with no easy access to facilities.
- \* Pump station is new from the original consultation. This development will cause additional pressure on the existing system, and there has already been local sewerage and pollution issues in this neighbourhood.
- \* Green corridor - Shrubhill Common will become an isolated nature area if the density of housing is increased to 1,100 houses, as any green corridor is removed for wild life.
- \* Plans need to be co-ordinated with other housing proposals in the area, as otherwise this will compound everything written above.



\* Should this go ahead, provision needs to be made for all contractor vehicles and wash facilities to be located within the LA3 development, and not on the surrounding area. Ideally contractors should be bused from the station to decrease impact and pollution.

### **Neighbour 53**

#### OBJECTION

The number of planned dwellings has increased from 900 to 1,100, with further dwellings no doubt being added on the adjoining HCC land at a later date. This will eat up almost every bit of green space in the development - and goes completely against the principals of the developers initial 'green' and 'airy' proposal.

Added to which, this will mean upwards of 2000 additional cars on the roads locally - which will not only mean traffic chaos, but an environmental nightmare. An independent survey based on the initial 900 dwellings, concluded that it would cause traffic 'gridlock' , so a 22% increase will be disastrous, with air pollution increasing dramatically - against all national guidelines. (Additionally, contractor's vehicles should be restricted to on-site parking only - not in the surrounding streets.)

The fate of our rural lanes is also an issue, with Chaulden Lane, Pouchen End Lane and Winkwell being under threat - again, against national guidelines. These are single track rural lanes - they are not meant for 'rat-run' traffic; it's already difficult at certain times, without any extra vehicles.

These lanes form part of the character of the area - the developers will be using a huge chunk of green belt land, (and wiping out much of the wildlife) so it's awful to think they will be destroying our rural lanes too.

Chaulden Lane is also proposed as providing access to the G&T site, which is wrong on so many levels. Firstly, as mentioned above, the widening necessary would completely destroy the lane, and secondly G&T sites should be inclusive - not stuck in a corner with their own 'back door' entrance.

There also seems to be inadequate provision for the increase in population in terms of amenities or medical provision - certainly not in phase 1 of the development . Many local GP's surgeries' NHS lists are already full - and we no longer have a hospital!

If this development is to go ahead, then it should be the best that it can be, not the worst. It should incorporate innovative, good planning and design which is a pleasurable space to be around and to live in; something we can be proud of. Instead it seems the developers are intent on squeezing as many boxes as they can into every bit of green space they can find, and to hell with the consequences. We need more housing, yes - but please Dacorum; we can do better than this

## **Neighbour 54**

### OBJECTION

I object to many aspects of LA3 development plans and believe residents should question the moral decisions taken by the council to date:

Housing - Local residents were consulted upon an estate containing 900 dwellings and within two years, plans have been submitted for 1,100 dwellings. How can this go ahead when we were only consulted on 900? I gather that there was some vague inference to 'approximate' or 'indicative', which was not made clear to local residents, is morally questionable, and should not vary by 200 dwellings as this adversely affects important environmental and wildlife safeguards which were sold to local residents as being central features of the development and were one of its only redeeming features. Hedges and wildlife corridors appear to have disappeared, leaving Shrublands Common isolated and wildlife doomed to an island of traffic and with nowhere to go.

It is clear from the plans, that shoe-horning in more houses has reduced the very premise on which this estate was sold to local people, of there being green spaces and wildlife corridors in the form of hedges. These seem impossible to find and were THE marketing point of the plans.

Residents were assured that the dwellings would be no more than 2 story dwellings, when in fact, plans have been submitted for three and four story dwellings. This is also contravening what we were consulted upon and must be amended and prevented from happening as this will change the whole look and feel of the development and the surrounding area!

Extra dwellings will also have a greater environmental impact, and strain on local services, infrastructure surrounding roads, noise and pollution.

Although we might be drawn into looking at each development in isolation, in fact, each one will have a cumulative negative effect upon the area, both on strained services, extra traffic on roads and negative environmental impact.

Environmental Impact - The local chalk streams are already drying up. Where will water be sourced for these new developments?

Local wildlife will be marooned on Shrublands Common, with no connecting wildlife corridors as hedges and other natural areas seem to have been removed from plans - presumably to fit in another 200 houses.

Hemel is known for its fields and wildlife areas dividing up the different estates/areas of Hemel Hempstead. Where is the green area to break up the existing area of

housing from the new estates? Removing/reducing green areas between existing areas and new housing will have a negative effect on all residents, existing and new.

Surface water runoff has been seen to be a problem in recent video's. Won't this get far worse once the area is built on? Where will the water and sewage go? On the houses at the bottom of the hill? i.e. around Chaulden Lane?

Huge increases in traffic will increase danger and pollution to local residents. This needs to be mitigated before someone dies!

Traffic - it is my understanding that initially 0.5 cars were attributed to each dwelling. This figure was not rooted in reality and seem to suggest that decision makers were determined for this development to go ahead no matter what the consequences for local people and the environment. Even 1.5 cars per household is now unrealistic, with most teenagers and adults owning a car each. The reality of the situation is that 2-5 cars per household added to already congested roads will make the area gridlocked, polluted and dangerous, especially entrances and exits to the estate and Chaulden Lane, used as a cut through to/from Berkhamsted and an access route via the A41 to the M25. Similarly additional traffic will have a negative effect on Bourne End Village, which it has to pass through on this route.

Increases in traffic will present a serious danger to Pouchen End Lane and Chaulden Lane residents. This reality of the situation of gridlock, pollution and danger will make a mockery of stated intentions to encourage walking and cycling, which quite frankly just appears to be a diversion away from the harsh reality of the situation. Every day will be a Sunday morning, when the road will be blocked to emergency vehicles.

G&T site exclusion of the Traveller site from the development - Both Government policy and Dacorum's policy are about inclusion; supporting gypsies and travellers in engaging with health and education etc. in the local community. Wasn't this the basis of the reason why the council was able to get the Green Belt removed and the point of adding these sites to new developments, rather than placing them away from residential areas? Current access outlined on the plan seems to indicate that they would have no access to the facilities that make up the development, including health and education. They will therefore be alienated, which contravenes government and council aims. How can this be acceptable and pass government and council legal requirements on this issue?

HCC 'Horses field' - What is to happen with this land? Will it be developed a little later so the houses are relatively small numbers and not attached to the 1,100 dwellings of the LA3 development? As stated earlier, pressure on infrastructure, local environment and health and education needs to be looked at as a whole for the entire area, not fudged and passed through in a piecemeal manner which will ignore the cumulative negative effects of each development.

## **Neighbour 55**

### OBJECTION

The entire plan is over ambitious. Too many dwellings for the site of LA3 (and underhandedly increased from 900 to 1100), and particularly the 350 immediately earmarked. Education in a Hemel already lags behind Bucks and Watford areas, this will further to put pressure on a fragile system. There is barely space available at the local shops/amenities, and I understand the plane is to build more but

There are already issues with traffic at peak times, lack of infrastructure (eg. Winkwell already has daily traffic jams. Trains are standing room only from Hemel and parking at the railway station is almost impossible after 8am, access to A41 and M1 already congested at peak times and several hours either side). Where is the evidence that full consultation was undertaken and commitment gained from the 3rd parties providing the infrastructure to the public, prior to consideration of any application.

Travellers site - I particularly object given that I have experienced a travellers sight first hand. I want to see the evidence showing the due diligence undertaken by the Council of the impact of such a site including research from newly established sites within a 20 mile radius.

I also object to it being rebadged as a travellers/gypsy site which is a change in terminology as far as I am aware.

More publicity and discussion required with Chaulden locals likely to be impacted. Given the impact on the local community it feels like the planning process is being kept very low key and under wraps to prevent the community from any objection. I only found out about this by chance and at 11:15 at night it is too late to let anyone else know.

There are a number of elderly neighbours who are not technical or don't have access to the internet- how can they show their objections?

## **Neighbour 56**

### OBJECTION

Thank you for the opportunity to consult on the proposed plans for the LA3 development. Having viewed many of the documents available and in consideration of the summary, we have the following submissions:

\* Affordable housing

This element is welcomed as part of the plan. However, it is currently very unclear as to the actual number proposed in Phase 1, specifically it states "up to 40% affordable

housing". That leaves a range of 0 - 440 affordable housing across the full development assuming a revised total of 1,100 houses. In the first phase, the percentage is unclear. The council should seek and agree a final amount of affordable housing with the developer prior to commencing the build. The full amount could be spread across the phases, but all parties would be clear on the total amount of affordable housing that will comprise the development.

\* Local amenities

The initial Phase acknowledges that local amenities would be accounted for, but will not result in any amenities being built. We would suggest that at least the School is built in Phase 1 - in addition to the LEAP - to account for the additional influx of children into the area. It should be borne in mind that not all children will be of the age to be accommodated by the school, so local schools will bear an additional pressure. But, the creation of a new school to accommodate primary age children would be most beneficial. We would be interested to see what representations the LEA have made in this regard.

The retail units are very small (approx 100 sqft) and the community facility being only slightly bigger (approx 175sqft). The community facility in particular needs further clarification, for example, is it a single storey open plan hall, or perhaps a two-storey hall with a mezzanine for many uses.

The "medical facility or other use" also highlights a concern, specifically that there is no commitment by the developers to build a medical facility. This development needs a medical facility without question. The immediate local surgeries are full and periodically close to new applications, the secondary line of local surgeries back into Hemel itself and Apsley have also introduced closures, not least due to the recent closure of West Herts Medical Centre at the hospital in the town. The medical facility needs to be included in Phase 1, again to accommodate the influx of new residents to the area.

I would also draw the reader's attention to the very liberal use of the phrase "up to" for all of the proposed sizes of these facilities. This places no finite obligation on the developers to provide appropriately sized facilities. A commitment needs to be sought from the council for hard numbers for each of the proposed facilities. Secondly, the medical facility may be a Dental surgery and not a Doctor's surgery, so again we would suggest that this is clarified in the final agreed Phase 1 specification.

\* Road access from Long Chaulden

We would suggest that the access from Long Chaulden is achieved via a roundabout - there are already several on this road rather than an explicit junction. Appropriate safeguards need to be implemented around this area, not least due to the Adventure playground located opposite to the access road.

\* Road access from Chaulden Lane

Chaulden Lane is defined as a 'rural road' and is therefore subject to the protections and guidance afforded to it under law. The current Phase 1 plan breaks some of these in the following ways:

- access to the Gypsy & Traveller Site;
- low-loaders and heavy plant machinery will damage, erode and eventually destroy the hedging, banks and peripheral flora and fauna;
- increased traffic will break the spirit and everyday level of traffic expected to be handled by a rural road;

Without widening, there will be numerous temporary road blockages necessary to allow site traffic into and away from the site. This will be exacerbated if the Emergency access is eventually transformed into an access road for the south side of the development.

\* Local road traffic and access

The council should seek a guarantee that all site plant and other propelled equipment remains either within the bounds of the development, or is moved away to specific sites of storage not located within the local area.

Additional developments in the local area will also be put under an extra demand on Pouchen End Lane and Winkwell. Winkwell is not a viable access road for heavy plant and low-loaders. Pouchen End Lane is also non-viable due to the sharp bends and both roads are also in the 'rural roads' definition. Both lanes are effectively single-track and have minimal places for passing - I therefore trust the reader can quickly appreciate that more blockages and 'gridlock' is a certainty at present. Access to The Avenue is also technically restricted due to the raised roundabout on Boxted Road which makes for a very tight turning circle.

\* Foul water pumping station

Whilst a necessary and welcome addition to the plan, the siting is inappropriate next to the Gypsy & Traveller site which will be subject to additional non-normal noise perhaps competing with the main West Coast Railway line less than 100 metres

away. It would be better cited to the east of the emergency access site, thus being nearer to the as-yet-un-allocated parcel of land owned by HCC and not currently part of the development.

\* Gypsy & Traveller site

The development offers a site for G&T's, but is no more specific than that the plots will be sold to another developer to facilitate potential occupants. It is unclear if suitable sewerage sanitation will be in place (pitches allow for more than just one static caravan). The only access is via the Chaulden Lane rural road which leaves the site non-integrated with the rest of the development. We believe this to be illegal under the current regulations protecting Traveller community - clarification should be undertaken by the Council as to whether part of the development is legal at all.

\* Mendacious car allocation per household projections

The proposed plan accounts for 0.5 cars per household. I will re-iterate that, 0.5 cars per household. Given the site's location within West Herts and proximity to major facilities, and without any proposed bus routes, each and every household must be assumed to own at least one car. The reality is that there will be more, but even assuming only one car per household causes a significant impact on the parking availability within the development and the impact on the local road network.

We would urge the Council to revisit their calculations before indulging the .....pipe and allowing this woeful calculation to be used. This type of misuse of town modelling principles brings dis-trust not only on the developers, but also the Council Planners who accept them. Please apply common-sense and real-world calculations.

Overall, the proposal needs to have the main facilities in place for Phase 1 to firstly accommodate the influx of new residents and then secondly to ensure commitment from the developers that the full development will be completed i.e. they will need to re-coup the initial expenditure of the facilities to gain their projected profit for the overall development.

**Neighbour 57**

OBJECTION

I strongly object to this planning proposal for the following reasons:

Housing numbers & Impact due to (~22%) increase in the number of dwellings

Numbers:

The maximum of 900 dwellings stated in the Core Strategy, but the application now proposes 1,100 in a reduced area (HCC land excluded in these numbers, thus the final numbers will further increase), and not agreed at any level by Dacorum or its residents. Consequently, previous consultations would be effectively voided if a higher number is now considered and agreed, residents having had no opportunity at any previous stage to consider a higher number.

The existing road infrastructure outside of LA3 will not cope with increase in traffic numbers for either 900 or especially 1,100+ homes on already congested roads

- o Safety impact to existing residents due to the extra traffic - care needed to ensure that this is not compromised

- o Mitigations proposed by developers are inadequate based upon experience and also based upon the most recent traffic analysis being the Jacobs Report from several years ago. This latter indicated that at 100% based on the extra 900 houses in LA3 there would be gridlock in Hemel Hempstead and a reduction of 15% in traffic was required to allow the model to work. Rather than a reduction of 15%, LA3 is now proposed to have an extra 23% houses. The impact on Hemel will be significant. This does not appear to be recognised in the planning application.

- o Without the community hub, school or GP surgery in phase 1, there will be extra traffic outside of LA3 in the earlier phases, which has not been taken into consideration.

- o The extra traffic generated down Chaulden Lane from the G&T site and servicing the Pumping Station will change the nature of that road, which is defined as a rural road. This will conflict with DBC's own policy for not impacting rural roads and as restated by developers themselves in their planning application.

#### Negative Impact on Rural Roads

The greenbelt area of LA3 has been declassified, on the strict understanding that there should be no further impact on the surrounding greenbelt with protection of the rural environment beyond.

However, I note:

An increase in the dwelling numbers of LA3 to 1100 plus, with no control over use of the rural roads, especially Pouchen End Lane/Winkwell, as a "rat run"

#### Proposals to widen rural Chaulden Lane

The 56-dwelling development in Pix Farm Lane will increase the traffic through these rural roads.

These roads are unsuitable for additional traffic and heavy vehicles generated by construction site traffic and travellers site traffic.

Amenities for Phase 1 and future phases of development, e.g. Retail, GP Surgery, School, Care Home



o There is nothing included in Phase 1 other than housing, therefore how will existing retail amenities outside of LA3 cope with 350 houses in Phase 1 when they are already unable to cope with existing people and vehicle traffic flow. An already dangerous situation develops daily at the Warners End, Stoneycroft shops, with traffic backed up along Long Chaulden Road blocking one side of this road due to access issues to the existing shopping area.

o What will be the timing of new amenities compared to the development of Phase 1? Phase 1 will generate 350 new properties, therefore in excess of double that number in terms of new residents over several years, including children and older residents. Existing local schools and GP surgeries are already over-subscribed. Where will new Phase 1 LA3 residents seek school places or medical facilities if nothing is provided within LA3 as part of Phase 1.

o Commitment MUST be provided that facilities and amenities, including a GP surgery, school & shops are built as part of Phase 1 and not deferred to a later date or Phase, the timing of which we have no current view of and therefore could be many years in the future.

HCC Land in the southeast corner, below the site identified in the planning application

I am concerned about the piece of land owned by Herts County Council (known to residents as the "Horses' Field") as follows:

o Why is this not included in the Outline Plan?

o In the DBC Core Strategy, the Site Allocations DPD (as adopted 12 July 2017) and the Master Plan document, this land was considered part of the LA3 Site Allocation (see SADPD Site Allocations Map Book GB/3 - LA3, also p 86 Local Allocation LA3 West Hemel Hempstead.) Plan 2 of the Master Plan area shows the HCC field and is announced in para 3.1 of the Master Plan.

o This field formed part of the area of land which was considered suitable for the provision of up to 900 new dwellings.

o Now this land is omitted from the planning application, yet still the number of houses has risen to 1,100.

o When this land is eventually built on the total number of houses will well exceed the 1,100 now proposed by the developers in this current application.

o This in turn would exacerbate all of the issues mentioned above, including transport, pressure on school places, on access to health care.

- Another issue has always been access to this site. It must be made clear that any access should be through the LA3 site and not along the existing narrow and congested Chaulden roads.

**Neighbour 58**

## OBJECTION

I wish to object most strongly to the gypsy site opening onto Chaulden Lane. As I understand it a gypsy site should not be placed into an existing community it should be placed within a new community therefore the entrance to the site should come from the new development and not into Chaulden Lane. This part of Chaulden Lane is extremely narrow and is a 60 mile an hour speed limit it is already being used as a rat run to and from the A41, this will undoubtedly become worse when the house on the new estate are built.

### **Neighbour 59**

## OBJECTION

We wish to object to the above planning application on the following grounds:-

The increase in the number of homes being built to 1100 would mean that the whole site would become urban with no space for a soft edge to the green belt. The increase in homes would also mean that the roads in the area would be regularly gridlocked and this would then drive more traffic through the rat runs.

The Travellers site should be included in the development, as per Government and Dacorum Borough Council policy. The travellers should have equal access to health and education with the rest of the community of LA3. The access arrangements mean that they would be unable to access the facilities on offer as there are no facilities in Winkwell.

The huge increase in the volume of traffic would cause an intolerable amount of vehicles using the rat runs, in particular Winkwell, which has a swing bridge and is a single track lane. The traffic would pose a serious danger for pedestrians and cyclists using the Winkwell, Pouchen End Lane and Chaulden Lane. This makes a mockery of HCC's attempt to encourage walking and cycling.

### **Neighbour 60**

## OBJECTION

Pouchen End Lane is already congested with traffic and used as a rat run during peak hours with cars accessing A41 from Potten End, Fields End and Boxted Road area. This issue will become worse as a result of additional housing. Plans should be put in place to make Pouchen End Lane a no through road to prevent this situation. Currently when dustbin collections, oil deliveries, grocery deliveries etc take place along the lane a 10-20 car tail back is a regular occurrence. Traffic turning into Winkwell from London Road frequently tailsback to A41 roundabout during peak hours This will be unsustainable with the risk of an additional 1800+ cars potentially during Pouchen End lane and Chaulden Lane as rat runs.

## **Neighbour 61**

### OBJECTION

We object to this applications for the following reasons...

The original plan was specified there would be no access and no additional traffic on this small country lane. Increased traffic to the lane would be hazardous to pedestrians my son crosses the road daily to go to school this is already becoming dangerous with rat run traffic obviously half of the lane doesn't even have a footpath.

Rural lanes need to be protected along with the hedgerows... this narrow lane cannot take caravans 3.6m wide. Travelers pitches seems to be randomly positioned so they are not part of the rest of development and infrastructure... surely they should be included within the development... why isolate them away from facilities and the rest of the development.

Park wood drive is already extremely difficult to get appointments additional pressure on this service would be awful.

## **Neighbour 62**

### OBJECTION

I strongly OBJECT to this ill-conceived plan to build a huge new homes development with no significant upgrade of the current infrastructure in the area.

It seems ludicrous to me that the Council would allow such a plan to go ahead without taking responsibility to robustly scrutinise it and consider the full impact on local residents, surrounding roads, sewage facilities, services such as schools and GP surgery/health services, public transport services, protected country lanes and wildlife.

The Council and local government representatives will be held accountable for their actions or inactions, as the planning is widely opposed by local residents.

Only someone who does not live in the area would think that adding thousands of homes in the area, whilst keeping the current infrastructure mainly in its current shape, would be reasonable.

It seems to me that there is no joined up thinking in assessing all planned developments in the West Hemel Hempstead area and the overall impact on the current and future local residents.

### **Neighbour 63**

#### OBJECTION

I object to this proposal. The increase in traffic and people will put vast pressure on already busy roads and community services. Which will be detrimental to the entire community and local area. I also believe it will destroy the beautiful surroundings of Chaulden lane which is a travesty as this area is much loved by cyclists, walkers, rambles etc.

### **Neighbour 64**

#### OBJECTION

The sheer volume of dwellings will cause severe road traffic problems in the areas of Warners End, Chaulden, Gadebridge and Boxmoor. At a conservative estimate there will be around 1000 extra vehicles on the road in the stated areas between 7am and 9am and again in the afternoon/early evening, every weekday. Severe delays are already an everyday problem for people in the above areas making their way out of the town and to other parts of the town. Modernising the roads and junctions in these areas would seem in most cases impossible.

### **Neighbour 65**

#### OBJECTION

I OBJECT to Planning Application 4/03266/18/MFA for reasons set out below. I strongly disapprove of the way in which the land at LA3 was withdrawn from the green belt, but I accept that many more houses are needed and that the LA3 site and countless others will be built on. However, this development must be made to work for all, current residents as well as those who will occupy the new houses.

Housing numbers and the impact of an increase of around 23% in the number of planned dwellings compared with the Core Strategy

Numbers. Under the DBC Core Strategy, Site Allocations and Master Plan process, residents were consulted on plans for up to 900 dwellings on LA3. The developers persuaded the Planning inspector during the Examination in Public to allow that 900 to be a minimum. At no stage have residents been consulted on any proposal to increase this number yet the submitted Planning Application is for 1,100 dwellings in a reduced area as the HCC land at the south-east corner was included in the 900 but is now excluded from the 1,100, yet there is recognition that this will be built on eventually, thus increasing the total to something over 1,100. At no stage have

Dacorum or the residents agreed to this increase which will lead to a much higher density of housing than that depicted in the developers' original diagrams. The current diagrams show a much less pleasant and more congested development. The promised green spaces and soft edge to the green belt almost seem to disappear with this density of housing, Previous consultations would be invalidated if the higher number is now agreed.

Impact.

Traffic studies previously undertaken on behalf of DBC (Jacobs Report) have indicated that even with 900 dwellings there would be traffic gridlock at peak times in certain areas modelled and a reduction of 15% was necessary to make the model work. Under the current planning application there is not a 15% reduction, but actually a 23% increase in numbers. Only minor alterations to existing external junctions are proposed and gridlock will be inevitable on already congested roads (see below).

Extra pressure on school places, access to healthcare etc. There will already be unacceptable extra pressure on school places, access to health care, parking at the local shops, the water supply and foul water drainage system with only 900 houses, and with the extra 200, it will have a detrimental impact on the day to day lives of the existing residents. There is insufficient evidence that adequate measures will be put in place to cater for all this.

The existing road infrastructure outside LA3 will not cope with the increase in traffic for 900, let alone 1,100 dwellings

As stated above in the section on increased housing numbers, there is technical evidence to confirm the knowledge and experience that we all as residents and local road users have, that the road system will not cope with the increased traffic generated by 900 dwellings, let alone 1,100+. The mitigations proposed by the developers in terms of minor off-site junction "improvements" are totally inadequate. When questioned at the developers' own public exhibition, their highways consultant admitted that some of the main areas of current traffic hold-up (before a single house is built) were outside his remit. What would be the point in creating an extra lane on London Road (A4251) to the west of the Fishery Road (station) roundabout since just beyond there is a narrow railway bridge, also 2 junctions (Felden Lane and Box Lane) which cannot cope. The planning application ignores all this.

There is also an issue of the safety impact on existing residents due to the extra traffic. Care must be taken to ensure that this is not compromised.

I do not believe that the real increase in traffic has been correctly assessed. None of the figures seen so far bear any relation to what residents experience. Local traffic counts carried out far exceed any figures printed in consultants' reports. The assumptions about the numbers of extra cars and the timing of extra journeys need to be critically reassessed.

The timing of the proposed (inadequate) changes to road layouts needs to be reviewed to ensure it reflects the reality of the increasing traffic as the phases of LA3 are delivered. At present these mitigations are planned rather later in the process than is necessary, particularly since the increase in traffic flow has been inaccurately assessed.

If the community hub, the school, the GP surgery are not built in Phase 1, there will inevitably be extra traffic outside of LA3 for people to access these services. This has not been taken into consideration.

The extra traffic generated along Chaulden Lane from the Gypsy and Traveller Site and servicing the foul water pumping station will change the nature of that road, currently defined as a rural road. This will be in conflict with DBC's own policy regarding rural roads, referred to by the developers themselves in their planning application.

#### Negative Impact on Rural Roads

The proposals regarding the rural roads, notably Chaulden Lane, Pouchen End Lane and Winkwell are unsuitable.

The LA3 site has been removed from the green belt on the strict understanding that there should be no further impact on the surrounding greenbelt with protection of the rural environment beyond.

However, the application contains:

i) An increase in the dwelling numbers of LA3 to 1100 plus, with no control over use of the rural roads, especially Pouchen End Lane/Winkwell, as a "rat run"

ii) Proposals to widen rural Chaulden Lane

I strongly object to the above for reasons detailed below.

The suggestions made in the Design & Access statement to encourage pedestrian and cycle access from LA3 to Pouchen End Lane, via green corridors, sound

attractive, but this is simply not possible on grounds of safety, without traffic control measures to limit car usage.

A cohesive approach is required to review the impact of all developments planned on the local roads. In particular, the 56-dwelling development in Pix Farm Lane will increase the traffic through the rural roads.

The eastern end of Chaulden Lane (by the houses and playing fields) is a two-way highway, but it is very narrow. Where cars are parked, only single lane traffic can pass. Houses are cut into the slope meaning that driveways exit directly into the road with poor visibility, and an increase in traffic will render negotiation onto the road even more dangerous than it is now. Residents have experienced damage to their vehicles.

More notably however, the western part of Chaulden Lane, from the houses to Pouchen End Lane, is a narrow, winding, single track rural lane. At the junction with Pouchen End Lane, a hill further reduces visibility and ability to pass. Traffic must take care to avoid collision and often is prevented in its progress due to the single track nature. The road is particularly unsuitable for heavy vehicles.

Moreover it is especially dangerous to pedestrians/dog walkers and cyclists, who can be pushed into edge/undergrowth to avoid collision with a vehicle. This is my personal experience of Chaulden Lane and those who use it as a rat-run drive far too fast. This is further exacerbated by the steep banks on the northern edge of this lane. An added issue is the proximity of the railway to the south, with a busy train network causing significant noise affecting pedestrians' ability to hear approaching traffic.

Hence any plan that may increase the level of traffic should be avoided.

The plan to widen Chaulden Lane is simply an insult to the local community, by further impacting on the rural area outside of the actual development itself which has already resulted in loss of green belt. This proposal is against national and local strategy regarding rural roads.

Hertfordshire Highways have stated:

'Chaulden Lane is definitely rural in character west of number 167 (just outside the speed limit change). It is narrow (one vehicle wide) with no footways and heavy undergrowth/ hedge on both sides.....'

The Stomor report 'Means of Access and Transport Appraisal' opines:

'Chaulden Lane is "Country Lane" in nature, and is not considered suitable for vehicular access to the site. This road is narrow, has poor visibility and no associated footways where it abuts the site'

'It would be possible to form an exit from the site to Chaulden Lane, which would enable pedestrians or cyclists to use this road to gain access to the hamlet, Grand Union Canal and the A4251'

Further references are detailed below.

Pouchen End Lane and Winkwell are again single track, very rural roads that are only suitable for a low volume of smaller vehicles accessing houses and facilities. Pouchen End Lane has particularly poor visibility, due to the high banks on either side.

Notably at Winkwell, access is via the delightful and old swing bridge with a 3 tonne weight limit, and a small bridge over the River Bulbourne. The swing bridge is obviously important and functional - in summer months it is frequently used by long boats causing further delays to local traffic, with a build up waiting on either side until the bridge reopens.

Residents and visitors to the area enjoy walking and cycling along these routes and their safety must be paramount. Dog walkers frequently complain about being pinned against the edge to enable a vehicle to pass.

There is a large car park on Pouchen End Lane opposite the junction with Pix Farm Lane. This is used by walkers and fishermen, as well as visitors to the boat yard and Three Horseshoes pub. The pub is extremely popular and frequented by many. The walk from the car park to the pub, even at the present time, can be concerning as traffic tries to wend its way through and navigate on-coming vehicles.

To the south where Pouchen End Lane joins the London Road (A4251) congestion already causes a dangerous situation with traffic reversing onto London Road to clear on-coming vehicles. There are a very limited number of passing spaces which work reasonably well with low volume traffic and local drivers who understand "the etiquette" - not "rat runners" who are not familiar. Accidents have occurred (I know of one local driver whose car was written off) and any proposal that might exacerbate this should be avoided.

The current situation is that a combination of Pouchen End Lane, Winkwell, Chaulden Lane and/or Pix Farm Lane are used as a "rat run" for traffic from the London Road/A41 through to Hemel Hempstead and from the north via Fields End Lane down Pouchen End Lane. This is increased significantly when there are problems on major roads such as the junction at Box Lane and London Road and also when the A41 is closed due to an accident (a regular occurrence).

This "rat run" traffic can be fast and dangerous and frequently causes congestion and blockages, especially around Winkwell and the swing bridge. "Road rage" is not uncommon as drivers appear to be unable to work out who should move aside to let on-coming traffic through.

The Pix Farm Lane development will lead to additional pedestrians and cyclists (including children) using Pouchen End Lane and Winkwell to access London Road, bus stops and the station. There will be an increase in pedestrian and cycling activity - which is to be welcomed as long as it is safe. But how can it be safe?



For all the reasons expressed above, Chaulden Lane is not in any way suitable for construction traffic. It goes without saying that nor is Pouchen End Lane / Winkwell, and this includes construction workers' access to work vehicles.

Herts County Council states that it will develop and maintain strategies for roads within the urban and inter urban network that:

"D On Rural Local Distributor and Access Roads: - Deter through traffic including rat running from using these roads; - Resist developments which would generate an unacceptable change in the amount or type of traffic."

Hertfordshire County Council Transport Policy Document states (3.8G) The County Council will resist development where:

i) The proposals would increase the risk of accidents or endanger the safety of road or rights of way users. Such risk exists at the present time and would be exacerbated by any increase in traffic.

ii) The proposals would cause or add significantly to road congestion, especially at peak travel times. Road congestion, especially at peak times, occurs now.

iii) The proposals would generate a significant change in the amount or type of traffic using local or rural roads or rights of way. Without controls the volume of traffic using the lanes as a "rat run" would undoubtedly increase, especially from those wishing to access the north of LA3 via Fields End Lane and Pouchen End Lane. The location of the Foul Water pumping station and Travellers site will generate large vehicles not suitable for rural lanes.

iv) The proposals would either significantly affect the rural or residential character of a road or right of way, or would significantly affect safety on rural or local roads or rights of way especially amongst vulnerable users, or would be located by a poorly designed road. This would undoubtedly be the case.

In terms of Road Hierarchy and Network Development (3.20) it is stated that developments on Rural Local Distributor and Access Roads which would generate a change in the amount or type of traffic will be resisted in the following circumstances:

- Where there is an increased risk of accidents;
- Where the road is poor in terms of width, alignment and/or structural condition;
- Where increased traffic would have an adverse effect on the local environment either to the rural character of the road or residential properties alongside it.

All of the above are applicable to the rural lanes bordering LA3 to the west and south.

Additionally at 3.21 we are informed that the county council's approach to rural transport policy, takes into account most recent Government guidance on rural

issues which encompasses key themes including to "improve rural road safety"; reduce the impact of traffic in rural areas and encourage cycling and walking." i.e. not to implement strategies that will have a negative effect on rural road safety by increasing traffic (either in volume or size).

At 3.25, under the subject of Sustainable Distribution and Freight, the strategy is to "Resist applications for new operators licences involving property served off the rural road network." How, therefore can this be reconciled with the provision of HGV licenses to service a Foul Water Drainage plant and a G&T site? It cannot.

In summary,

- I object to any proposals that impact on the safety of walkers, cyclists and the local community, who use the rural roads to access houses and local facilities
- I object to any proposals that exist to alter the rural nature of the rural roads
- I support proposals to reduce traffic, thus improving safety for non car-driving road users
- I support proposals to reduce traffic, thus improving access and functionality for local vehicle road users.

Further references include:

Policy CS2(B) criteria includes the need to:

- Respect local character and landscape context

The Master Plan includes the requirement to:

- Ensure no vehicular access from Pouchen End Lane - however without controls Pouchen End Lane can be accessed from the north and London Road
- Reinforce and enhance the existing structural landscape features adjoining Pouchen End Lane to enable a new, clear and defensible Green Belt boundary to be defined and to reduce further the limited views of the development from the west - what good is this if traffic in the rural roads is increased causing danger and congestion
- Prevent further access onto rural lanes
- Protect the amenities and character of Pouchen End Hamlet - As far as I can see the plans will cause irreparable harm to the hamlet.
- Maintain the rural character of Pouchen End Lane and Chaulden Lane.

Proposed Gypsy & Traveller Site [Copied from the WHAG response which as a committee member I support]

Reference is made to the October 2016 Planning Inspection on Site Allocations and its acceptance of the strategic principle of housing numbers, including G&T sites, as opposed to the planning detail. The April 2017 Site Allocations Main Modifications Report of Representations, MM21, states clearly that "Detailed site issues will be considered through the planning application process". Therefore, many of the concerns raised historically are now germane.

As shown below, the developers' 'Planning Statement' (clause 7.47) that "This masterplan has been produced with reference to relevant Government guidance in the form of Designing Gypsy and Traveller Sites - Good Practice Guide" is fallacious. Further, the developers' response to issues raised in their Statement of Community Engagement' (p15) is nebulous: A footpath through the barricades does not constitute integration. Conversely, locating the sewage pumping station adjacent to the G&T site can only be interpreted as a highly offensive statement as to the social standing of gypsies and travellers.

The siting and design of the proposed G&T site does not accord with national or local policy as follows:

PLANNING POLICY FOR TRAVELLER SITES (DCLG, AUGUST 2015):

POLICY A - Using evidence, 7 a) Pay particular attention to early and effective community engagement with both settled and traveller communities

COMMENT: While the 2006 and 2008 consultations were supported with a detailed report, the CS/LA3 consultation has been generic; with the "potential location" for the traveller site now being presented as a foregone conclusion without any apparent design or sustainability review (DBC Council meeting - January 2016 - Minutes p8, quoting question by Leo Bedford (WHAG) and reply by Andrew Williams:

"The location of the Gypsy and Traveller site within the LA3 sites will however be a matter for the independent Inspector to consider when he examines the Council's Site Allocations document.

The independent inspector DID NOT consider the location of the G&T site within LA3, merely the principle of housing needs within the overall Site Allocations

Policy B - Plan Making, 10 a) Identify and update annually, a supply of specific deliverable sites

COMMENT : No update since 2008, providing no 'proportionate evidence' in favour of the Traveller sites on LA3 nor options should a compliant location on LA3 not be deliverable. This is delinquent on the part of DBC.

POLICY B - Plan Making 10 b) Identify a supply of specific, developable sites or broad locations for growth

COMMENT: The 2008 study provides a dated but detailed appraisal by comparison to the broad proposals in the LAs

POLICY B - Plan Making 10 c) Consider production of joint development plans that set targets on a cross-authority basis

COMMENT: Not seen

POLICY B - Plan Making 10 d) Relate the number of pitches or plots to the surrounding population

COMMENT: As currently proposed, the hamlet of Winkwell is the relevant population

POLICY B - Plan Making 13 Ensure that sites are sustainable economically, socially and environmentally

COMMENTS (including those relevant to the Good Practice Guidance cited by the developers):

The proposed site is marginalised at the lowest most South Westerly corner of the site, with main egress South away from the main development and minimal physical linkages to the main site and amenities.

It is the furthest point from local services; as the crow flies 600m uphill on foot and a circuitous route of 2.7km via the minor road and already strained infrastructure of Chaulden Lane, a "Rural Lane" (see also comments on lack of compliance with Rural Roads policy)

The proposed site is only 600 metres from an A41 junction but only via minor rural roads with specific weight and width constraints; in particular, over canal bridges which are notorious bottle necks including the unreliable swing bridge which is narrow and has a weight limit

The proposed site seems designed to turn its back on the community and vice versa.

The location is too far to walk (especially if in need of healthcare) and the lack of internal road linkages necessitate a circuitous drive. There is no convenient bus route.

The London - Manchester mainline is less than 100m away from the proposed site, a significant health & safety and environmental (noise) risk

The site as proposed is exposed to the prevailing wind from the SW

POLICY C - Sites in Rural Areas, 14 Local authorities should ensure that the scale of such sites does not dominate the nearest settled community.

COMMENT Given the "potential site" and orientation, the nearest community is the hamlet of Winkwell; the 6 residential properties will be dominated by 7 traveller pitches.

POLICY E: Traveller Sites in Green Belt, 17 Green belt boundaries should be altered only in exceptional circumstances.

COMMENT: The failure to deliver compliant G&T facilities undermines any exceptional circumstances used to justify the alteration of the green belt boundary under the Site Allocations.

DACORUM 'CORE STRATEGY' , 2013

POLICY CS22, New Sites will be:

(b) Located close to facilities

COMMENT: The proposed site is the furthest point from local services in LA3; as the crow flies 600m uphill on foot. The location is too far to walk (especially if in need of healthcare or carrying shopping) There is no planned bus route. The lack of internal road linkage means the alternative is circuitous route of 2.7km via the minor road and already strained infrastructure of Chaulden Lane, a "Rural Lane" (see also comments on lack of compliance with Rural Roads policy)

(e) designed to a high standard with: (i) an open frontage similar to other forms of housing; and (ii) landscaping or other physical features to provide an appropriate setting and relationship to existing residential areas.

COMMENT: The developer proposals provide for a segregated laager , akin to apartheid, do not meet these standards in any way.

POLICY CS22 Any new transit pitches should also:

(a) achieve good access to the M1 or A41 main roads; (

COMMENT: The proposed site may only be only 600 metres from an A41 junction but only via minor rural roads with specific weight and width constraints; in particular over canal bridges which are notorious bottle necks including the unreliable swing bridge which is narrow and has a weight limit

b) minimise potential disturbance to adjoining occupiers.

COMMENT As currently proposed, the hamlet of Winkwell is the relevant population which will be dominated by the presence of the G&T site.

Laager = An encampment formed by a circle of wagons. An entrenched position or viewpoint that is defended against opponents

Amenities for Phase 1 and future phases of development, e.g. Retail, GP Surgery, School, Care Home

Phase 1 appears to include only housing. This would put immense pressure on existing amenities outside LA3, used by current residents. The existing retail areas are already under pressure, for example, especially in terms of car parking. How will they cope with an extra 350 houses? Already a dangerous situation develops daily at the Stoneycroft shops, Warners End, with traffic backed up along Long Chaulden Road blocking one side of this road while waiting to access the existing shopping

area. The new residents will also want to park at the shops, whichever they choose, making the situation worse.

The new amenities mentioned in the outline planning application must be built within Phase 1. 350 new properties will have at least twice that number of occupants, including children and older people. Existing local schools and GP surgeries are already over-subscribed. So where will the new residents of LA3 Phase 1 find school places or medical facilities if nothing extra is provided under Phase 1? It is essential that these necessities are provided within Phase 1: a GP surgery, a school and shops.

HCC Land in the southeast corner, below the site identified in the planning application

Being a close neighbour, I am concerned about the piece of land owned by Herts County Council (known to residents as the "Horses' Field"). Why is this not included in the Outline Plan?

In the DBC Core Strategy, the Site Allocations DPD (as adopted 12 July 2017) and the Master Plan document, this land was considered part of the LA3 Site Allocation (see SADPD Site Allocations Map Book GB/3 - LA3, also p 86 Local Allocation LA3 West Hemel Hempstead.) Plan 2 of the Master Plan area shows the HCC field and is announced in para 3.1 of the Master Plan.

This field formed part of the area of land which was considered suitable for the provision of up to 900 new dwellings. This piece of land is omitted from the planning application, yet still the number of houses has risen to 1,100 on a reduced site. Therefore, when this land is eventually built on the total number of houses will well exceed the 1,100 now proposed by the developers in this current application. This in turn would exacerbate all of the issues mentioned above, including transport, pressure on school places, on access to health care.

Another important issue has always been access to this site. It must be made clear that any access should be through the LA3 site and not along the existing narrow and congested Chaulden roads where "near-misses" happen daily due to poor sight-lines, on-street parking and vehicles which are too wide for the roads. Sadly, it can only be a matter of time before someone drives too fast in this area and a serious accident occurs.

Conclusion

I find that there is a lot that is unsatisfactory in this planning application and the development is so very important and extensive that it is essential for all concerned to get it right from the beginning. It is not right to sacrifice the well-being of the current residents for the sake of the developers' profit margin. I am far from convinced that these plans will provide the accommodation that is needed either.

### **Neighbour 66**

#### OBJECTION

I object to the application for two reasons.

Firstly a lack of clarity/transparency has rendered the consultation process pointless. Namely:

the sudden increase in the number and height of the residential properties

vague references to possible non-residential buildings, e.g. 'a medical facility or other use', with no details of likely timing, funding or future operation means there is no guarantee anything will ever be provided even though a clear need has been demonstrated

similar lack of detail around open spaces again providing no assurance that they won't eventually be dropped in favour of even more residential properties

the traveller site with its separate, totally unsuitable access, is not an integrated part of the proposal and should therefore be a stand alone application which fully takes into account the likely impact on the small Winkwell community and address the concerns around how the site will be managed in the future and by whom

if this is part of a core strategy then the other nearby proposed developments such as that at Buttons Farm should be taken into account to produce a coherent plan

Secondly there is no adequate traffic management scheme to manage ALL the additional vehicle movements which the development would generate - construction vehicles, delivery lorries/vans, staff and visitors associated with the specialist accommodation for the elderly and the nursery in addition to cars relating to the residential properties. The intention to use a rural lane as the access point for the traveller site which will involve the movement of caravans is a clear breach of the Herts CC Highways policy and nothing has been put in place to protect the other nearby rural routes, ensure the safety of walkers and cyclists and prevent these routes becoming even greater 'rat runs' than they are already.

### **Neighbour 67**

#### OBJECTION

I wish to make a comment regarding the increased traffic problem that is going to happen when the developments on the west of Hemel are built.

Winkwell is a one way street that already creates traffic jams in the London Road in both directions, particularly at busy times. Traffic waiting to get into Winkwell will block the road passed the A41 roundabout and for 50 yards towards Berkhamsted. At present this is a minor cut through, but with a vast housing estate on the railway side (Chaulden Lane) the problem will be exemplified.

This road crosses the swing bridge over the Canal. The bridge is often out of action and so enhances problems for cars using this road.

In order to help to keep an open road for fluid movement, I would suggest closing Winkwell to traffic, so making a safe route for pedestrians, on a road that does not have footpaths, or making it a one-way street.

The traveller site. I can see the need for a travellers site on this development to meet government policy.

Why does it have to be isolated at the bottom end of the development giving the occupiers little access to the education and other services provided in the development.

They should be incorporated into the main development to become part of their community.

I ask that these points might be considered.

### **Neighbour 68**

#### **OBJECTION**

Disproportionate increase in house to the existing village area. Increasing density of dwellings particularly in a small village in green belt location. The surrounding infrastructure and lanes cannot accommodate the proposed massive increase in dwellings. Single track lanes with no verges or pavements which are very narrow are completely unsuitable for increased traffic. Currently walkers, dog walkers, horse riders, mothers and children are a significant safety concern in lanes used as a rat run from hemel through to the London road. Any proposal to widen these lanes is a breach of Herts CC highways policy and would be completely unfeasible.

The cut through from Chaulden lane into Winkwell or along Pix Farm Lane towards Sharpes Lane frequently used as a rat run along narrow lanes and major safety concern.

Closure of the rat run by blocking up at the railway bridge or at Chaulden lane and Pouchen end lane would prevent the rat run danger to road users.



### **Neighbour 69**

#### OBJECTION

I would like to object to the above planning application on behalf of my wife and I.

We live in Bourne end and regularly use the lanes for our children to get to and from school and their clubs. I am really concerned at how the area will be able to cope with the extra traffic and the risks it will present to local residents as already it's dangerous.

Please can you present how this has been stress tested to handle the extra traffic and how you can demonstrate that this will not cause harm.

### **Neighbour 70**

#### OBJECTION

I am writing to share my concerns about the proposed LA3 - 900 development.

My main concern is with the increase in traffic through Bourne End. I feel there will be a dangerous increase in capacity and speed of traffic in Chaulden Lane, Winkwell which is often congested due to the swing bridge on the canal, Pouchen End Lane and Pix Farm Lane. These are, as you are aware, single track lanes which are very narrow in places with some passing places. Increased traffic flow in any of these lanes poses a significant danger to pedestrians, horse riders and dog walkers. I understand there is a proposal to widen parts of Chaulden Lane this in my opinion will only encourage people to use the lane as a 'rat run' and make it an even more dangerous road. I understand it is Herts County Council policy to reduce the number of rural lanes used as 'rat runs' and this is clearly in breach of this policy.

The proposed Traveller site at the end of Chaulden Lane can only contribute to the traffic in the area so increasing the danger in the area.

The siting of the Traveller development appears to me to be contrary to both Dacorum BC and Government policy to integrate with the new housing development. Proposed access to the site via Chaulden Lane and Winkwell will not integrate the Travellers with LA3 but exclude them from the development. The proposed site will in my opinion dominate the settled community at Winkwell particularly because the increase in traffic and the entrance being onto a sub-standard road with danger at 'rat run' peak times.

### **Neighbour 71**

#### OBJECTION

We object to aspects of LA3 development plans

We have not long moved to the area, and we can already say that adding 900 dwellings alone (I believe proposal for 1100 houses has been submitted, without any consultation?). Adding 900 homes will inevitably adversely affect the local environment and wildlife.

I have been advised that the original plans were for 2 story dwellings and the application is actually three and four? This will have a HUGE impact on the look and feel of the area.

A huge increases in traffic will make what is already a dangerous route even more dangerous, plus there would be a massive upward turn in pollution to all local residents.

Increases in traffic will present a serious danger to Pouchen End Lane and Chaulden Lane. The reality of this will be GRIDLOCK, it will also discourage walking and cycling. Emergency vehicles, I believe would struggle now to gain access at certain times, if you added more traffic this poses a very serious issue (I assume the new homes will house old and vulnerable, this proposal makes these people even more vulnerable!).

## **Neighbour 72**

### **OBJECTION**

I object to this application because:

- 1) What little public consultation there has been, is not in line with the submitted plans. That is, I believe the public was deliberately miss-lead during the early phases specifically in relation to environmental matters, reasons for removing the site from the greenbelt, green spaces, soft-edges, facilities, access for the Gypsy & travellers site, larger higher buildings etc, all of which add to an entirely different plan to that which was original shown.
- 2) Stages of the consultation process seem to have been skipped, moving from indicative type of statements to fait accompli with little/nothing in-between.
- 3) The rise in the number of houses from 900 to 1200, which is unsustainable for the reasons outlined below
- 4) The failure to plan adequately for the appropriate infrastructure to support these houses. E.g. raising the number of houses without the associated traffic impact assessment being complete or considering pressure on existing facilities such as water and waste.

- 5) Introduction of four-story buildings which are both not in keeping with the surrounding area and breach the tree line.
- 6) Access to the Gypsy and Traveller site being into Chaulden lane; this breaches national planning policy in several ways, including creating a segregated community which is deliberately isolated from the new facility, effectively an apartheid system for this ethnic group.
- 7) Additionally, access to the Gypsy and Traveller site being into Chaulden lane also breaches national planning policy in a second manner by setting up a travellers site that now dominates a small existing community.
- 8) Points 6 & 7 combined raise questions around the legality around releasing the land from the greenbelt to be used for the traveller's site if it is not properly integrated into the new development (releasing land from the greenbelt on its own for Gypsy and travellers site is also against national planning policy)
- 9) Widening of Chaulden lane - which is in contradiction to Hertfordshire county council policy on rural lanes. Widening of the lane will promote it as a "rat-run" along with increasing the danger on the lanes for pedestrians, cyclists and horse riders.

### **Neighbour 73**

#### **OBJECTION**

Traffic is heavy already for the area and the proposed plans will not support the influx of traffic that will accompany this development.

### **Neighbour 74**

#### **OBJECTION**

I wish to OBJECT to this planning application for the following reasons:

#### **General Comments –**

- I have not been notified by the planning authority by post, email or observed any notices on lamp posts as to this application. It has been poorly publicised and it appears not to comply with the council's own statement of community involvement. Therefore this application should be re advertised and the consultation extended.
- The application is misleading suggesting a modest development of around 350 properties but in actual fact includes a clause to build over a 1100 residential properties, schools, lakes, traveller sites, doctors, shops etc etc.
- The application is on green belt land and no reason has been provided to justify the need to build on it.
- The Councils own Authority Monitoring Report for 2016-17 states targets for building of residential dwellings have been exceeded so there is no demonstrable need to such a large development.

- The Core Strategy Documents produced by Dacorum BC are out of date and not a true reflection on the needs of the community. Therefore if the assessment tool used to determine the application are out of date how can the application be considered?
- The Local Plan 1991 -2006 adopted in 2004 are similarly out of date and not a true reflection on the needs of community. Therefore if the assessment tool used to determine the application are out of date how can the application be considered?
- The Local Allocation Plan 3 appears to have been produced in conjunction with the developer (in fact their logos adorn the front cover). This is anticompetitive and suggest that the application will not be judged fairly and upon their merits. The LA3 Plan should be rewritten by another local authority to ensure transparency going forward.
- Several other areas of land in Dacorum are more suitable for development.
- The development reduces the availability of arable land for farming and food production.
- The local community does not want the development.
- The access provision is very poor.
- The development proposes community improvements for the new properties but nothing is proposed to offset the misery the existing residents will be required to suffer during the building and post construction.
- The development is a significant burden on the local community.
- The use of Community Infrastructure Levy needs to be considered by DBC to offset their additional costs.

1) Reviewing the document entitled Phase I and II Geo-Environmental Site Investigation, Land West of Hemel Hempstead, October 2016 1CO101380p2r1:  
a) It states that a search for historical landfill sites has been carried out by contacting the Environment Agency. It should be noted that the Environment Agency does not hold ALL the records of historical landfill sites and in many cases Hertfordshire County Council will have been the waste regulation authority for sites that were operated before 1995. This failure to check records accurately means it is not possible to confirm if historical waste deposits are in place. In addition given the proposed development area is adjacent to several farms it is important to carry out a detailed site investigation to ensure that farming waste, not subject controlled waste legislation until recently, is present. As the applicant has not provided all the necessary information or taken due diligence to prepare an accurate application then the application should be refused.

b) The presence of solution features in the chalk is a cause for concern. The solution features are where the chalk strata is subject to dissolving over geological timescales. As the chalk dissolves the overlying soils, sands etc collapse into the void space. This "solution feature" if not correctly identified, remediated will pose a risk of subsidence for any properties built over the top of them. A full site investigation should be carried out using cone penetrometers and a treatment plan put forward to ensure the solution features which the report accepts are in the area are remediated. Until a suitable site investigation and treatment strategy is proposed then it is not possible to assess the risk accurately and the application should be refused.

c) The presence of made ground found during the intrusive site investigation suggests that waste has been deposited in some areas of the proposed site but no

effort has been made to determine the type and scale of the waste deposits in the area. It should be noted that the excavation and re-deposition of the made ground will require an Environmental Permit from the Environment Agency.

d)The commentary on ground anomalies can only be taken to confirm the points raised in b) above. Therefore once again until a suitable site investigation and treatment strategy is proposed then it is not possible to assess the risk accurately and the application should be refused.

e)The statements on groundwater monitoring suggesting that groundwater levels were low at the times of the monitoring suggest that the report has not developed an accurate picture of the hydrogeology under the site so it does call into question the assumptions that have been made in the rest of the document. It is not clear if the report has looked at any BGS data in the local area to determine historical ground water levels in the area. Collecting historical data would provide a more complete data set for making any groundwater assumptions in the rest of the document. The applicant has not taken care to provide accurate information and is using only very limited and as it admits in it's own reports, unusual data due to extreme dry weather the application should be refused.

f)The presence of a high pressure gas line under the site is noted but we are not aware of what mitigation is proposed by the developer to reduce the risk of damaging the pipeline during the construction phases or long term controls that are proposed to ensure future property owners do not damage the high pressure pipeline in subsequent years. The use of S106 power to prevent new structures being put up or excavations greater than 30cm should be considered for areas either side of the gas pipeline. Hemel Hempstead has already suffered from the largest explosion since WWII so taking some small steps to mitigate the risks in the long term would be prudent.

g) Soakaway drainage will exacerbate the generation of new solution features across the site and increase the risk of subsidence across the site. The proposals should not have any soakways in order to prevent this risk. We note the presence of made ground has been identified so the installation of soakways into made ground may mobilise any contamination contained within them. For this additional reasons soakways should not be permitted on the site. As this will leave the proposed area without suitable drainage this is in contrary to Planning Policy CS29 on 'Sustainable Design and Construction' so the application should be refused.

2) When reviewing the document "APPENDIX 4.1: Formal EIA Scoping Opinion Report and DBC Formal EIA Scoping Opinion"

a) we note that the developer is proposing to use a CEMP (assumed to be a Construction Emission Management Plan). It goes on at point 1.122 to state that "a visual examination will be used to monitor whether unacceptable levels of airborne dust are travelling beyond the boundary". As the principle components of dust that are harmful to human health are PM10 and PM2.5 and are not visible to the naked eye then this control measure is entirely ineffective. Given the close proximity to sensitive receptors adjacent to the property and sensitive receptors on the site as development is underway, we suggest the council impose conditions to require comprehensive ambient air monitoring for PM10 and PM2.5 around the site

perimeter using a reference or continuous indicative monitor with a limit of 75ug/m<sup>3</sup> average over a 5 minute period to comply with government Air Quality Management Standards for PM<sub>10</sub>. This is in accordance with the planning guidance issued by the GLA and Institute of Air Quality Management. As the application does not protect human health, the environment or comply with UK Air Quality Standards then the application should be refused.

b) we note a rather dismissive statement at point 1.1.24 suggesting all air quality impacts will be determined but it fails to provide any meaningful detail on how this will be done. Therefore as the application does not protect human health, the environment or comply with UK Air Quality Standards then the application should be refused.

c) We note that according to the document; "2015 Updating and Screening Assessment for Dacorum Borough Council in fulfillment of Part IV of the Environment Act 1990 - Local Air Quality Management dated July 2018" that there is no monitoring of nitrogen dioxide levels or PM<sub>10</sub> or PM<sub>2.5</sub> in the west of Hemel Hempstead. It appears that no monitoring has been conducted in this area or adjacent to the roads that the developer proposes to access the land. Therefore even if the developer did determine the air quality that they fail to provide details on in point b) above, they cannot accurately determine if the levels are currently giving cause for concern (ie exceeding the Government's Air Quality Standards) or will do in the future. It should be noted that any attempts to model the levels of air pollution without detailed pre-existing information would be viewed as misleading. In order to overcome this the developer should install a network of diffusion tubes around the site, on the proposed access roads and on property to the North East before the development is given consent to ensure it is not contributing to exceedances of the Government's Air Quality Standards. Clear limits should be agreed before the development can proceed and monitoring should continue during and after the construction (at the developers cost) to ensure the limits are followed. Therefore as the application does not protect human health, the environment or comply with UK Air Quality Standards then the application should be refused.

d) We note that M-EC Acousticair referred to in the document "Environmental Statement, Land at West Hemel, BDW Trading Ltd (Barratt David Wilson), Taylor Wimpey UK Ltd, Stimpsons and Bletsoes" are predominantly technical experts in noise and vibration but they do not seem to be as well regarded for air quality impacts following a quick search on the internet. No detail is provided of the actual qualification of the staff carry out the noise and air quality work where as other areas of expertise the staff are named and their qualifications and experience are defined. Has a less qualified and experienced officer carried out this work? As this information is missing it is not possible to determine the information that been provided by the applicant as being accurate and therefore this application should be refused.

### 3) Footpaths -

We note that according to the definitive map - footpath 90, 91 and 21 are adjacent to the proposal site. Access routes to the site that have been proposed by the developer will cross several of these footpath with busy roads. These footpaths are well used and enjoyed by the local community. They are a wildlife corridor and need

to be protected. It is not clear what the developer proposes to protect these footpaths and wildlife corridors.

Planning Policy CS29 on 'Sustainable Design and Construction', states that,  
- "New development will comply with the highest standards of sustainable design and construction possible. With regard to floodrisk and drainage, the following principles should normally be satisfied:

? Provide an adequate means of water supply, surface water and foul drainage;

? Minimise impacts on biodiversity and incorporate positive measures to support wildlife;

? Minimise impermeable surfaces around the curtilage of buildings and in new street design"

Unfortunately the proposals will inevitably impact on biodiversity as the footpaths will be surrounded on houses on either side and they will cease to be wildlife corridors. They will also reduce the local wildlife value significantly and diversity. In order to overcome this the developer should be asked to provide a significant buffer around the footpaths to maintain their amenity and wildlife value. As this has not been provided the application should be refused.

#### 4) Community Value

We note the proposals include an offer to provide some community facilities. It is not clear if the developer is required to provide these or if they "may" include them as part of the proposals. We would appreciate clarity on this important point. The community infrastructure is already at breaking point with local shops at Stoneycroft and Long Chaulden already beyond capacity. The proposed development should not add additional burden on these community areas as their isn't sufficient capacity. In order to overcome this the development must have it's own community shopping area provided BEFORE the housing is constructed to minimise the impact on the Stoneycroft and Long Chaulden Areas. As the proposal will place local community facilities under additional strain the application should be refused.

#### 5) Access

We have concerns over the use of The Avenue to access the proposal area. The Avenue is already congested with car parking due to insufficient parking provision on the adjacent roads and properties. Additional traffic on this road accessing the proposed development will cause significant and ongoing congestion which is compounded in winter months as the road is effectively single lane due to icy road conditions on adjacent roads, forcing residents to park cars all along The Avenue. In addition the additional traffic will have a significant amenity impact in the form of additional noise, vibration, poor air quality. The strength of feeling in the local community on this issues is very high and the developer should take note. We propose that proposed point of access to the development via The Avenue is downgraded to an Emergency Access only with gates secured by fire brigade keys. As the application will cause noise, vibration, poor air quality, congestion to communities adjacent to the access points and no mitigation has been proposed then the application should be refused.

#### 6) Drainage -

##### a) Foul Sewerage Water

It is particularly concerning to note in the "Preliminary Foul Drainage Strategy" the

comments from Thames Water who have stated "that the existing sewerage networks adjacent to the site do not have sufficient capacity to cater for the full development beyond 100 units." It goes on to state "A number of drainage options were discussed with Thames Water for providing both network and treatment capacity for the development beyond these 100 units. These are summarised below;

- Upgrade existing downstream sewerage networks to Maple Lodge STW.
- Provide a separate dedicated connection from the development to Berkhamsted STW and provide upgraded treatment facilities.
- Provide a hybrid system utilising existing capacity in the Maple Lodge networks for early development phases with later phases taken to Berkhamsted.

To address this Thames Water appear to be planning to expand their network to cope with 329 properties by 2028 but the proposed in this planning application are for at least 1100 properties. Even with the a significant improvement to capacity at the Berkhamstead WWTW their still is a shortfall and a total lack of headroom at the WWTW. It should be noted that Thames Water have only confirmed they have no concerns about the proposals for 100 additional units to their sewer system. We feel that the developer should bear the cost of the proposed 1.96km new sewer that is required to connect the proposed development up to the Berkhamstead WWTW and not Thames Water who will pass the cost on to the community. The use of S106 should be explored to enable this.

It should be noted that the foul drainage proposed for the development relies entire of an active management system of pumping the sewage up to the Berkhamstead WWTW. The current pumping station on the south side of the Potten End Swing Bridge over the GUC has been responsible for significant pollution incidents. In these cases raw sewage has entered the Grand Union Canal (GUC). The reliance of an active control system, with a proven track record of failure is in appropriate for such a large development. We suggest that the developer amends their application include a back up pumping station that can operate in parallel or a duty and back up to provide additional resilience and protection of the environment. We believe that the points raised above identify that the proposed development is contrary to Policy CS29 on 'Sustainable Design and Construction' as the foul drainage capacity is lacking and so the application should be refused.

#### b) Surface Water

The application includes the construction of several large lakes or attenuation ponds with the intention of slowing the surface water as it travels across the proposed site. No detail is available on to the construction or maintenance of the lakes. Lakes such as this will be effective at slowing surface water flow across the site but it is appropriate to know the design, construction, depth, design of the edges how the ponds will be managed to ensure they are healthy and the safety of the residents, particularly young children especially close to the primary school and the well used adventure playground. This needs to be provided. Details on the provision and maintenance of lifesaving equipment, warning signage also needs to provided. Until this information is provided in full we believe this is contrary to Policy CS29 on 'Sustainable Design and Construction in that the proposals for surface water drainage are insufficient.

The drainage ditch shown on drawing 16-21-1005 and other in that series appears to be a straight featureless design. It does not include meanders to slow the flow of surface water, or increase the bio-diversity. Once again this is contrary to Planning Policy CS29 on 'Sustainable Design and Construction' and therefore the application



should be refused.

We note the use of Porous pavement in drawing 16-21-1005 and others in that series but no detail is provided to ensure the provision of porous pavement remains in place in the long term or on future built parking area to maintain the run off figure provided in the calculations. As no details have been provided on how this will be done then this application should be refused.

#### 7) Cost to the Community

The application includes proposals to widen roads, make new access points, close roads, disruption caused by road works, instal new sewers, build roads across footpaths, increase the costs of road maintenance, require air quality monitoring and places additional burden on local amenities to name just a few. These cost are felt by the local community in the form of increased rates or a drop in service provision by the local council. We request that Dacorum BC fully explore the additional costs that this significant development will place on them and we ask that measures are put in place to recover all of the costs they incur either via a CIL or a Section 106 agreement for the life of the development. As no application has been provided by the applicant then this application should be refused.

### **Neighbour 75**

#### OBJECTION

I am writing to object very strongly to the building of 1100 new houses planning application re: 4/03266/18/MFA in the close proximity of my property and home on greenbelt land. I have been trying to sell my house in vain for 2 years, reducing the price considerably. All to no avail. Protective buyers who made an offer always come back to cancel it as soon as they find out about this plan. Further more to make matters worse the plan was originally passed for the building of 900 houses only. 300 have been added without any consultation or warning. All surrounding existing and oncoming properties are further blighted by the building of a group of houses for gypsies which is very very worrying for existing and prospective owners alike. Chaulden Lane and its neighbourhood are one of the nicest quietest and safest areas of Hemel this wrecking development is going to impoverish the neighbourhood financially and physically beyond all recognition, destroying the countryside and increasing noise levels and pollution exponentially for thousands of inhabitants whose children will inherit greatly devalued property. The lanes around the gypsy camp are very narrow and this gypsy camp should be built somewhere far more convenient for vans or caravans, near the M1/ Maylands industrial estate where access is easy and there aren't any existing residents likely to be rightly upset. This development is pure vandalism.

Disproportionate increase in house to the existing village area. Increasing density of dwellings particularly in a small village in green belt location. The surrounding infrastructure and lanes cannot accommodate the proposed massive increase in dwellings. Single track lanes with no verges or pavements which are very narrow are completely unsuitable for increased traffic. Currently walkers, dog walkers, horse riders, mothers and children are a significant safety concern in lanes used as a rat

run from Hemel through to the London road. Any proposal to widen these lanes is a breach of Herts CC highways policy and would be completely unfeasible. The cut through from Chaulden lane into Winkwell or along Pix Farm Lane towards Sharpes Lane frequently used as a rat run along narrow lanes and major safety concern.

Closure of the rat run by blocking up at the railway bridge or at Chaulden lane and Pouchen end lane would prevent the rat run danger to road users.

### **Neighbour 76**

#### **OBJECTION**

I have concerns regarding increased traffic congestion.

Is it possible to expand the proposal to include improving the road links to the A4251/A41 via Winkwell? Diverting traffic away from the major congestion points of the railway station and town centre would be significantly beneficial.

### **Neighbour 77**

#### **OBJECTION**

I have lived in the area for 4 years plus and during that time I have encountered traffic issues in this area. with the planned LA3 development the following should urgently be taken into account prior to construction works commence. The following list will clarify my concerns as well as my neighbours

1. The Phase 1 construction of 350 dwellings is only accessed from the `THE AVENUE` this will create a major traffic congestion during the working periods
2. Suggested solutions with cars currently parking in the road would be to provide LAYBYES within the grass verges which are wide enough to allow for this off road parking
3. With reference to the above currently cars parked restricts the two way traffic and with lorries and other construction vehicles queuing to enter the site this will be a bottle neck for other vehicles to exit and enter `The Avenue`
4. The roundabout at `THE AVENUE / BOXTED ROAD` junction will in my opinion will not cope with the amount of heavy traffic especially at rush hour commuter traffic
5. The proposed minor road / pavement modifications at the Warners End (Shell Garage / Stoneycroft shops) will not be cope with the additional vehicles
6. The school drop off at this location in mornings and afternoon is extremely busing again repeating what i have previously stated this will create a bottle neck on all intersecting roads at this point. accounting for the pedestrian traffic lights being constantly being operated

7. Another issue to take into account are the 65 dwellings being constructed at the junction with Boxted Road and Galley Hill as currently this junction is a congested point and that is not accounting for this site being in full construction mode

8. What has not been taken into account is that all traffic in the Fields End / surrounding roads feed into the Boxted Road again causing traffic congestion

9. My concern is that there should be alternative road access into the construction site not only down The Avenue may be a entry / exit onto different roads

10. As a final point please observe the amount of vehicles currently parking on the Boxted Road and surrounding side roads this will only get worse

Please urgently review my comments as i feel that these are constructive for the forthcoming LA3 Development and should be addressed

### **Neighbour 78**

#### **OBJECTION**

1)Travelers site; this is always a controversial item, but I believe that the natural concerns of the local residents and the council's obligations to provide these sites are best suited in the proposed location off Chaulden Lane. I believe this is the best option for these sites and should not be changed.

2) What obligations are there on the contractors to minimise disruption to the local ) residents especially on the Avenue in the first phase? Any parking of contractor's vehicles on the Avenue or the failure to clean vehicles BEFORE leaving the site would cause major concern to the local residents.  
When will the improved bus routes be available? Immediately there will be up to 1000 more people accessing the Avenue once built, and the bus routes need to be in place at that time.

3)Why only 35% affordable homes in Phase 1 when earlier presentations indicated closer to 40%. Will any clarity be sought on future commitments to this before the application is considered ?

4)Parkwood Drive Surgery is already under severe pressure. Until recently, there was a moratorium on new patients. This development can only make matters worse. Who has responsibility to respond to this inevitable consequence ? It would seem sensible for the planned new surgery to be incorporated in Phase 1, especially when there are other new developments in the vicinity i.e. Boxted Road; Marchmont Fields etc which will only increase demand for the services of doctors

### **Neighbour 79**

#### **OBJECTION**

As a long term resident from the area, I write in connection with the proposed LA3

development. My principal concern is the effect of the increased traffic along Chaulden Lane. Since the A41 bypass was constructed the Lane has become a favoured route for drivers going to the bypass. In the feasibility studies that you have no doubt undertaken can you confirm the additional traffic that you anticipate in each of the three phases? You also would have taken into account the 54 new houses that are planned for Pix Farm Lane?

We understand that a traveller site planned will be accessed via Chaulden Lane and that the number of vehicles could amount to 28. Also the site has no access to the new development and is therefore not integrated as such sites are intended to be. Who will own the site and will be responsible for maintaining in good order? If the Lane is to be widened does this not contravene legislation referring to maintenance of Rural Lanes?

We believe there is planned to be an "emergency" entrance into the development from Chaulden Lane into the development. How will this be monitored and who will have access? The field owned by the County Council, we believe, is not included in the development. Are there any plans to develop it for housing and if there are would they impact on traffic using Chaulden Lane?

I would assume that the majority of the traffic from the development heading for the town and down towards the station will use the Long Chaulden exit. What are your assumptions of the increase in traffic using the Long Chaulden/Northridge Way/Fishery Road route? Are there any plans to ameliorate the increased traffic flow?

A major concern must be the effect on the already over-stretched medical facilities at Parkwood Drive Surgery

Your comments on all of the above would be appreciated.

### **Neighbour 80**

#### **OBJECTION**

I strongly object to these proposals based on the significant impact this will have on traffic congestion within the area.

### **Neighbour 81**

#### **OBJECTION**

I would like to object on the basis of the following elements of the scheme:

Number of properties - significant increase from original core strategy.

Sustainability and Energy Use - There doesn't appear to be any commitment or mention of what the targets are within the planning application. Previously Core Strategy committed to a very high level (Code for sustainable homes 6?)

Traffic - Local infrastructure is not built to cope with the increase and proposals to better mitigate impact need to be clear. I am specifically worried about the impact on Chaulden and Pouchen End Lanes. These lanes are used extensively for walkers, cyclists and runners of all ages these are narrow, further traffic particularly from those not familiar with the area is a recipe for disaster. A safe walking and cycling route between The Winkwell and Chaulden would be welcome.

Traveller/Gypsy pitches - I find it hard to understand the proposed location. It will be cut off from services yet dominate Bourne End and will inevitably add to traffic concerns above.

### **Neighbour 82**

#### **OBJECTION**

Living in Boxmoor, it is with great concern that I comment on this proposal. The roads surrounding Boxmoor are already heavily congested at peak times. By adding an additional 1,100 houses to the local area, the roads will simply be unable to cope with traffic coming through Boxmoor to get across Hemel. Inadequate traffic studies have been carried out to justify the proposal.

I am also very concerned about DBCs lack of communication regarding the increase from the consulted 900 dwellings upto the new 1,100 dwellings. How can it be allowed for proposals to be changed without consultation?

### **Neighbour 83**

#### **OBJECTION**

I object to Planning Application 4/03266/18/MFA for the reasons set out below.

We need more housing in Hemel Hempstead and elsewhere. However, using this fact as cover for choosing the convenient option of removing land from the Green Belt for LA3 rather than exploring other environmentally less damaging options is reprehensible. While this is now water under the bridge, it is none the less disgraceful.

Increase in numbers over the Core Strategy

Why have a Core Strategy if, following its approval, you deviate from it without further consultation? The Core Strategy on which residents were consulted stipulated up to 900 dwellings in LA3. The builders persuaded the Planning Inspector to make this a minimum. The current planning application is for 1100 houses, an increase of 23%, which has not gone out to further consultation with residents. This increase will render the development much denser, with much less green space - the existence of the green spaces was used as a counter balance to the loss of the green belt in the original consultation. This cannot be claimed as a sound democratic consultation of residents and the number of houses should be reduced to the original 900, or a further consultation exercise should be undertaken.

The traffic studies commissioned by the developers were cynically commissioned with limited terms of reference, with no realistic focus on the road structure outside the immediate area. DBC used the Jacobs Report (traffic modelling) to inform their picture of the traffic conditions, based on 900 new dwellings, but even these (defective) evaluations, predicted gridlock at peak times and required a reduction of 15% in traffic flow to make their model work. With 1100 dwellings, and only minor alterations proposed for external key junctions, going ahead on this basis is akin to a head in the sand abdication of responsibility.

The impact of 900 new houses on school places, health care, parking at local shops, drainage, water supply, appears to be likely to lead to a detrimental effect on the lives of existing residents. There is insufficient evidence that adequate measures will be taken to cater for all this - with 1100 dwellings there are bound to be really acute problems.

### Detrimental impact on Rural Roads

LA3 will inevitably lead to an increase of traffic on the rural roads close to the development, even if there is no vehicular access. These are single track lanes without pedestrian pathways. Chaulden Lane, Winkwell and Pouchen End Lane are already "Rat Runs" and dangerous to driver, pedestrian, dog-walker and cyclist. Increased traffic will render them all the more so. The plan to widen Chaulden Lane and build passing places on it can be seen by anyone objective who knows the area as not viable. The widening of such rural roads is also against HCC policy. If the long-term plan to have more cyclists is realised, then they would have to be banned from these roads or there would surely be fatalities. The carving out of the high bank to create an access off Chaulden Lane to the proposed Gypsy and Traveller site is just not feasible or acceptable. This would totally change the character of the lane.

If during the construction of LA3 heavy construction traffic is allowed to use these rural roads, they would surely be badly damaged and a major hazard to others using them.

### Proposed Gypsy and Travellers Site

The plan to locate the G & T site where proposed during phase one of the LA3 development is contrary to both national and local planning policy (please see the objection submitted by WHAG, with which I agree, for chapter and verse on this). Due to the difference in land levels, construction of an entry to the site proposed will be complicated and expensive. The site will only be accessible by rural roads and is beyond walking distance from all amenities. It is a fact that crime levels rise significantly close to G & T sites (Government statistics) and this one will be very close to the main railway line and a pub which is a tourist attraction on the Grand Union canal.

### Amenities for LA3

Although amenities such as a shop, school, GP surgery and care home have been promised for LA3, none of them are to be built during phase one of the project. Other local amenities such Warners End and Chaulden local shops are some distance

away and they already now have major parking and traffic queuing problems associated with them. Where will the children of the residents of Phase 1 go to school? It is clear that new residents on LA3 will require their own amenities from day one and these must be included in phase one of the project.

#### HCC Land

The HCC land abutting the houses in Campion Road, known locally as "The Horses' Field", was included in the Core strategy as part of the area on which up to 900 houses would be built. This land does not form part of the current planning application, so when it is eventually developed, the sum total of new houses will well exceed 1100 and further exacerbate all the problems described above, not least road congestion, access to health care and school places. This further strengthens the argument for reducing the number of houses or having a further consultation exercise.

Access to the HCC land is a further issue. The Chaulden roads around it are completely clogged up with traffic both moving and parked. In due course, access to it must be via the rest of LA3, and the developers need to allow for this in their infrastructure plans.

#### Conclusion

We need more housing, but for the new LA3 development to be for the benefit of all, it needs radical fine tuning as described above. As it stands, there seems to have been very little attention paid to the well-being of the existing residents around LA3. Our experience of the Planning Inspector caving in to the developers' demands over the number of houses and the timing of the G&T site, does not leave great confidence that the situation will not deteriorate further over amenities and house numbers as time passes.

#### **Neighbour 84**

##### OBJECTION

I object to this development because the surrounding roads are already ridiculously congested- my commute is currently borderline given traffic congestion around Northridge Way, Chaulden Way and Fisheries Road. There is not sufficient facilities such as doctors surgery- Parkwood is at its max capacity. And most importantly, building on green belt land and irrevocably changing the beautiful landscape of this part of Hemel is a crime and something I find totally unacceptable.

#### **Neighbour 85**

##### OBJECTION

I object to this application because

1) What little public consultation there has been, is not in line with the submitted

plans. That is, I believe the public was deliberately miss-lead during the early phases specifically in relation to environmental matters, reasons for removing the site from the greenbelt, green spaces, soft-edges, facilities, access for the Gypsy & travellers site, larger higher buildings etc, all of which add to an entirely different plan to that which was original shown.

- 2) Stages of the consultation process seem to have been skipped, moving from indicative type of statements to fait accompli with little/nothing in-between.
- 3) The rise in the number of houses from 900 to 1200, which is unsustainable for the reasons outlined below
- 4) The failure to plan adequately for the appropriate infrastructure to support these houses. E.g. raising the number of houses without the associated traffic impact assessment being complete or considering pressure on existing facilities such as water and waste.
- 5) Introduction of four-story buildings which are both not in keeping with the surrounding area and breach the tree line.
- 6) Access to the Gypsy and Traveller site being into Chaulden lane; this breaches national planning policy in several ways, including creating a segregated community which is deliberately isolated from the new facility, effectively an apartheid system for this ethnic group.
- 7) Additionally, access to the Gypsy and Traveller site being into Chaulden lane also breaches national planning policy in a second manner by setting up a travellers site that now dominates a small existing community.
- 8) Points 6 & 7 combined raise questions around the legality around releasing the land from the greenbelt to be used for the traveller's site if it is not properly integrated into the new development (releasing land from the greenbelt on its own for Gypsy and travellers site is also against national planning policy)
- 9) Widening of Chaulden lane - which is in contradiction to Hertfordshire county council policy on rural lanes. Widening of the lane will promote it as a "rat-run" along with increasing the danger on the lanes for pedestrians, cyclists and horse riders.

### **Neighbour 86**

#### **OBJECTION**

Traffic is heavy already for the area and the proposed plans will not support the influx of traffic that will accompany this development.

### **Neighbour 87**

#### **OBJECTION**

Response to additional documents  
Access to information

The additional documents continue the approach which could best be described as obfuscation. There are now some 296 documents largely labelled with such titles as 'Proposed Plan' (53) or 'Additional information' (all bar one of the 15 comments dated 19/07/2019). No consultee comments appear under the heading 'Consultee comments'.



The NPPF states

'Succinct and up-to-date plans should provide .....a platform for local people to shape their surroundings.' (Section 15)

'...be accessible through the use of digital tools to assist public involvement and policy presentation' (Section 16.e))

These requirements of the NPPF have not been met.

The information provided does not address the concerns of local people as already expressed.

a. The lack of conformity to both the aims and substance of the Draft Plan or the Master Plan for LA3 as presented to the public and the basis on which the land was removed from the Green Belt.

b. Concerns related to traffic issues with respect to the rat run use of Pouchen End Lane and Chaulden Lane and the impact on Winkwell. (Bourne End Village Association have submitted proposals for amelioration of existing problems. They have not been effectively addressed and appear to have been misunderstood.)

c. The lack of conformity to HCC Highways Policy on rural roads.

d. Concerns of non-conformity to local and National policy 2105 Planning policy for Traveller Sites / DBC CS22 and 14.44.

The additional information continues the pattern set throughout the consultation process that local feedback has been ignored.

### **Neighbour 88**

#### **OBJECTION**

Please accept this email as a vehicle to express my grave concerns & disappointment over the Planning Application LA3 ref 4/03266/18/MFA.

I have lived in Chaulden Vale for coming up to 20 years and always enjoyed the surrounding beautiful Green Belt countryside which is soon to be taken from us existing homeowners by the development LA3.

I sincerely appeal to the common sense of Dacorum Borough Council to :-

Review the siting of an unwanted Gypsy and Traveller site proposed to be sited on Chaulden Lane within phase One of Proposed works :- with access to the site being via Chaulden Lane.. Chaulden Lane is currently struggling with the rat run of traffic using it in peak hours as access to A41 & surrounding area .. The proposal of the Gypsy Site will increase vans and lorries using a Lane not capable of accommodating such usage.

I also believe the housing of a Drainage Pump facility on Chaulden Lane with access also off Chaulden Lane in Phase One, will also add to above traffic and thus unacceptable congestion.

The original application was for 900 dwellings in LA3, this is now to be 1100 x dwellings plus a care home (70 Residents) with the added future proposed development of the 'Horses field'. How can this possibly be feasible !!! At the time of the 900 x dwelling application an independent traffic report stated that the

development would bring GRIDLOCK to Long Chaulden and surrounding roads  
..The Infrastructure is simply not in place to accommodate such an increase in traffic to area.

Please advise what are the plans for the 'Horses Field' Off Chaulden Lane ?

Our beautiful little corner of Hemel is soon to be destroyed by :-

"A Gypsy and Traveller Site unwanted by local residents.

"A housing development LA3 to be sited in an area with insufficient infrastructure ref traffic , schooling , medical facilities.

"Promised Green Land within development being constantly reduced by expansion of houses within LA3 proposal.

I implore you to please take on board the thoughts, concerns and comments of existing householders in the surrounding area & West Hemel Action Group WHAG acting on our behalf .

I genuinely feel bullied by this development and the constant stream of bad news brought as a result of this application.

Please take into consideration & look after us existing residents!

### **Neighbour 89**

#### **OBJECTION**

As long time residents of Pouchen End, we have seen over recent years a quiet country lane turn into a busy rat-run for traffic going both ways between Boxted Road and the A41 by-pass. There is already far too much traffic using Pouchen End Lane which is a narrow single carriageway road. The situation will become much worse as traffic from the new estate of 1100 new houses is bound to also use Pouchen End Lane as rat-run.

Pouchen End used to be a quiet and peaceful place to live. We would totally support the idea of making Pouchen End Lane a no through road by shutting it off with bollards near the footpath stile. Getting rid of passing traffic will return Pouchen End to the quiet hamlet it was and should be.

There should not be a traveller site attached to the new housing estate as there is no legal requirement to provide one.

### **Neighbour 90**

#### **OBJECTION**

Much is being made of the fact that the proposed gypsy/traveller site is 'out on a limb' and not integrated with the whole development.

This is easily solved by moving the traveller site to a more central location.

Option 1 – Land owned by HCC further along Chaulden Lane. This blank space on the plan is the ideal place, more central, access could be off Champion Road, not Chaulden Lane. Existing Locals can integrate with the travellers and vice versa.

Option 2 – Move traveller site to a more central location in the north of the side, perhaps off the avenue. More central location, close to shop – school, good access, this area (phase 2) lends itself well.

Both options offer a solution to a more integrated traveller site. There is a chance to alter this without major change to plans.

### **Neighbour 91**

#### **OBJECTION**

I have lived in Bourne End for over 40 years and wish to endorse my support to BEVA's letter of objection to the above proposal and its effects on the ethos of the village.

I wish to register my dismay that the master plan promise to 'prevent further vehicular access onto rural lanes' and to 'maintain the character of Pouchen End Lane and Chalden Lane' appears to have been forgotten.

As a resident, I fear that Pix Farm Lane would end up as the major route to Berkhamsted via Chaulden Lane from the proposed development adding to the further additional vehicles from the development of the Buttons site. Our narrow country lane is used regularly by ramblers, dog walkers and horse riders. It has high hedges and no pavements. Increase in traffic would render it hazardous.

### **Neighbour 92**

#### **OBJECTION**

We are in receipt of your notification dated 27/09/19 and would comment as follows:

At night I rest my head and sleep where X is marked (on the plan attached). I am quite old and have difficulty sleeping at night.

If it is the intention to use The Avenue as a main access for lorries etc. during the construction of the new estate behind our home, I would ask you to place the main gates to the building site away from my property on the other side of the footpath and bird sanctuary running along the edge of the field behind my house. This would cause me less disturbance and make it easier for the public and dog walkers when using the path during the construction period.

I can also see on the plan that it is intended to remove trees and shrubs for half the length of our back fence behind my property. This is not acceptable to us or the birds residing in these trees, and I would ask that the trees and shrubs directly behind our

house are left as they are (Please see attached photo).

### **Neighbour 93**

#### **OBJECTION**

I am writing to express my concerns regarding planning application listed above I have lived in the area for 11 years after moving here from St. Albans because of the volume of traffic and parking problems.

We love the fact that there are lots of beautiful green belt areas around us which might soon be taken by the new proposed development.

We would ask you to review the siting of an unwanted Gypsy and Traveller site on Chaulden Lane which would only add to an increase of Lorries and Vans and more traffic, and the enormous strain on our resources.

Originally it was 900 dwellings which has now increased to 1100 plus care home for 70 residents this is unacceptable.

Our lovely peaceful area of Hemel is soon to be destroyed.

Please consider how this will affect the existing householders within this area. We feel deeply upset and stressed about the whole situation. Please consider how this will affect us existing residents

### **Neighbour 94**

#### **OBJECTION**

During consultation for the above proposal, DBC/Developer draft planning discussion documents specifically stated the intention to 'maintain the identity and character' of the hamlets of Puchen End, Fields End and Winkwell once LA3 West Hemel Hempstead district is developed. It is further intended that 'no vehicular traffic from the new development should access directly onto Pouchen End Lane.'

This is all very well, but Pouchen End Lane is already a favoured rat-run between Hemel Hempstead/Boxted Road and the A4251/A41 junction. It is inevitable that a proportion of traffic generated by the proposed new neighbourhood will use the Pouchen End Lane rat-run (via the Avenue), further exacerbating existing problems. Similarly, traffic will surely increase along Chaulden Lane (via Long Chaulden). Winkwell Lane will become an even worse traffic bottle-neck than it is at present. Each of these lanes is subject to morning and evening 'rush-hours' and a regular flow of vehicular traffic throughout the day – a level of traffic which is surely unsuited to narrow, winding, single-track country lanes.

In discussions with DBC in the lead-up to the land, now subject of the above planning application, being taken out of the Green Belt, the potential for Pouchen End Lane to be 'blocked-off' was discussed with then DBC Planning Officer Richard Blackburn – who did not rule it out in principle.

I would urge the LPA and Highway Authority to seriously consider precluding through traffic along Pouchen End Lane by blocking off the lane to the north of the hamlet of Pouchen End. Although blocking off the lane would cause some inconvenience to residents of Pouchen End and Fields End, the overall benefits would far outweigh any disadvantage.

The many vehicles using Pouchen End Lane are causing significant degradation of verges, banks and hedgerows where they run off the metalled surface to pass one another. This damage is causing a striking change in the character, nature and appearance of the lane, significant to the character of environment of Pouchen End.

What used to be a peaceful 'tree-tunnel' lane is now characterised by surface pot-holes and deeply rutted, muddy road margins. The banks and hedges – attractive environmental features, formerly rich in wildlife, are now becoming increasingly denuded of native plants, animals and birdlife – nothing short of environmental vandalism.

Incidents of aggressive and inconsiderate driving practices, reluctance to give way, inability to reverse to passing places, use of private drives and gateways as passing places are all common-place in Pouchen End Lane, as are minor accidents and confrontations, verbal abuse and threats of violence by motorists to other road users, pedestrians, cyclists and recreational horse-riders. All these factors impinge on the safe and peaceful use of the lane.

Increasing numbers of large delivery lorries are using the lane, presumably directed by sat-nav aids, causing damage to trees. Roadkill carcasses are all too often found along the lane – badgers, muntjac, foxes and smaller wild animals and birds, as well as the occasional domestic pet, another disbenefit of current traffic levels.

Vehicles have a tendency to speed through Pouchen End if the road appears clear of other traffic, ignoring existing warning signage. While there have been no serious accidents yet, but one suspects that with the amount of vehicles now using the lane it is only a matter of time before there is a significant incident. The closure of Pouchen End Lane would remedy a failure to properly plan how traffic would access the local A41 junction, will avoid further exacerbating the problem and bring environmental improvements.

Making a section of Pouchen End Lane a 'green lane' would reinforce the re-defined Green Belt boundary as the lane could remain as a bridleway/footpath and have a recreational use benefit. Surely it is desirable for the lane to be a safe, attractive, 'green lane' environment rather than a hazardous, motorists' rat-run.

Much is made of accessibility to the countryside. The proposed LA3 development will afford new public recreational open space while retaining public footpaths, two of which feed into Pouchen End Lane. Purging vehicular traffic from the lane by making it a no through road would be a significant environmental improvement by encouraging recreational use and benefit walkers, cyclists, runners and riders, giving safer access to Winkwell and the Grand Union Canal and similarly towards Potten End and Berkhamsted Common.

When Grove Hill was developed in the late 1960s/early 70s Piccotts End Lane was blocked-off to potential traffic from the new development. Similarly when the A41 by-pass was built, Bourne End Lane became a no through road to avoid a rat-run between Bourne End Mills A41 junction and London Road, by the same token, Pouchen End Lane should now be blocked off.

It is understood that Bourne End Village Association are seeking for Chaulden Lane to be blocked off at its junction with Pouchen End Lane to sort out the Winkwell congestion problem. I would support this suggestion as it would effectively maintain separation of the existing hamlets from the new residential area.

I would contend that the proposed inclusion of a travellers' site at the south-western corner is impractical and contrary to planning advice regarding the integration of travellers' pitches within a new residential development.

Access and traffic considerations are aspects of the planning criteria for the provision/location of travellers' sites, as well as proximity to schools, local amenities and health care provision. Pitches indicated off Chaulden Lane have no cohesive transport links with the proposed school or local and welfare facilities other than via estate footpaths or by road via Long Chaulden.

It is questionable whether access for mobile homes into the proposed traveller site would be at all practiceable (Herts CC Highways road design guide suggests longitudinal gradient of between 1% and maximum 5%. The ground level of the proposed site is about 2m above Chaulden Lane and keeps rising – so a road of 5% gradient of about 60-70m lengthening the site would meet existing ground level.

A location which better meets the planning criteria would be near the proposed new Long Chaulden road access for the proposed development, a location previously considered for suitability as a travellers' site in a 2006 DBC study.

Whilst I support the proposed development, as a resident, I would urge the LPA to close Pouchen End Lane to through traffic in the interests of maintaining the character of the existing hamlet and enhancing the rural environment at the new western boundary of Hemel Hempstead.

## **Neighbour 95**

### **OBJECTION**

I object to this project, which was ill conceived from the outset. The level of consultation has been poor throughout and continues to be poor, despite the feedback provided in the comments submitted online.

DBC seems to continue to ignore comments submitted by local residents, specifically all the concerns raised, for example this development would significant increase levels of traffic (most households in my road and those nearby have at least two cars per household, planning for 0.5 cars per new household is planning to fail the current

and future residents!), the provisions for a GP surgery, schools and other amenities would need to be prioritised and not built at a later time.

All the new documents do not address any of the above concerns. DBC are you not listening to the residents!

### Neighbour 97

Objection:

I am registering my objection to current LA3 development plans proposed for the Chaulden area.

Where I live, I will look directly onto phase 5 of current plans.

My concerns are for the size of development - 1,100 houses and growing daily - and for local environment.

I walk my dogs regularly along footpaths that separate fields, taking in the vista we are very lucky to enjoy.

I understand the need to provide more housing in the area and that land is of a premium but a more even spread throughout the borough would surely be a safer way of approaching this dilemma.

Cramming houses onto the proposed site to fulfil quotas promised in elections is not a logical approach.

Please ask for more thought to be input before it's too late.

### **Neighbour 96**

OBJECTION

Myself and numerous local residents strongly oppose the development of Green belt land in Hemel Hempstead.

The area is already extremely congested with morning rush hour traffic regularly at standstill getting on to the M1 and M25 via the A41.

The idea of further houses and therefore traffic is the last thing the town needs.

Infrastructure is clearly not fit for purpose and would be completely inadequate if the population is artificially increased.

Non-existent consultation of this strategy adopted without taking into account local residents opposition has left a lot to be desired.

Neighbours have moved out of the area and many, including myself and my family, feel like following.

The council state they have offered residents sufficient consultation by publishing plans on their Facebook page which is, as I'm sure you are aware, not somewhere anyone looks.

Schools and healthcare investment are already insufficient for the town's requirements.

Greenbelt should be saved with protected status not built on as a cheap alternative to brown field sites.

The sale of greenbelt land to developers to generate revenue for the council to supplement budget cuts is unethical, unjustified and unwarranted.'