

4/02553/17/MFA - CHANGE OF USE FROM AGRICULTURAL LAND TO CEMETERY, TO INCLUDE VISITOR ADMINISTRATION BUILDINGS, ROAD AND PATHWAYS, CAR PARKING AND LANDSCAPING.

LAND SOUTH WEST, BEDMOND ROAD, HEMEL HEMPSTEAD, HP3 8LN.

APPLICANT: Dacorum Borough Council - Mr N Brown.

[Case Officer - Briony Curtain]

Summary

The application is recommended for approval.

Despite its location in the Green Belt, there is an identified need for additional burial space in Hemel Hempstead and the land at Bunkers Park has been allocated for this purpose. The site is designated as mixed use site MU/5; Bunkers Park, Bunkers Lane (leisure space and cemetery) in the adopted Site Allocations DPD. The provision of the cemetery element of proposal MU/5 is thus welcomed.

The size of the proposed cemetery has been determined by the burial rates and the duration the Council wish the cemetery to be active for. It is estimated that the site would expect 100 burials per year. Phase 1 occupying the northern part of the site (3.8 hectares) has space for 3,600 graves giving 36 years of burial space and 1846 cremated remains plots. The southern part of the site would be available for future expansion as and when needed.

By its nature the majority of the cemetery site would remain open and free from buildings. The proposal does, however, include the construction of a building and other facilities (hard surfacing for parking, lighting, etc) to support the cemetery use.

The provision of new buildings in the Green Belt would normally amount to inappropriate development, however para 89 of the NPPF sets out clear exceptions to this. Of relevance is;

- *provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it*

The buildings, lighting, and hard surfacing (car parking) are considered essential for the day to day running of the cemetery. They are thus concluded as 'appropriate facilities' and fall into one of the exceptions outlined in para 89. The buildings and other facilities are therefore considered appropriate development provided they preserve the openness and do not conflict with the purposes of including land within the Green Belt.

Given the existing site is agricultural land, entirely open, and free from physical structures, any new facilities would have an adverse impact on the openness of the Green Belt. However, the adverse impact of the proposal would be minimal. There are several factors that would minimise the visual impact and ensure the overall openness of the area is preserved. These, together with the lands formal designation for cemetery use via the Site Allocations DPD are considered to amount to very special circumstances. The Borough's existing burial ground is nearing capacity and there is therefore a proven need for additional cemetery space. The site has been formally allocated via the Site Allocations DPD, but cannot function / operate as a cemetery, without a basic level of facilities. The proposed facilities are concentrated to the north of the site, are modest in their size and scale, and their visual impact would be softened by the substantial planting being proposed. Given their very modest size, scale and height, their proposed location within the site and its wider context, the provision of the proposed building would not conflict with the purposes of including land within the Green belt (check unrestricted sprawl, prevent towns merging; safeguard countryside; preserve setting of historic towns and to assist in urban regeneration by encouraging recycling of urban land).

The benefits the scheme would bring in meeting the longer term burial needs of the Borough clearly outweigh the very limited harm the ancillary service buildings would cause to the openness of this part of the Green Belt.

A transport Statement supports the proposal and demonstrates that there would be no adverse impact on the safety or operation of the adjacent highway. Herts County Council are satisfied and have raised no objection subject to the imposition of a series of conditions. The site would provide parking for 80 vehicles which is considered adequate and the arrangements acceptable. An impressive planting plan has been proposed which will ensure an attractive rural setting to the entire site. Given the predominantly open nature of the proposed use, the planting proposed and the separation distance to the nearest residential properties, there would be no harm to residential amenity. On the contrary the proposal would provide an attractive outlook for existing residents.

As stated, the site is allocated as a mixed leisure / cemetery use. The current proposal relates only to the cemetery use. Whilst it would be preferable for a comprehensive scheme coordinating the different uses across the site (leisure and cemetery), the plans submitted clearly show an acceptable area of land to the north that has been retained for leisure purposes. The cemetery development would not preclude the delivery of the leisure use at a later date.

Site Description

The application site is located to the west of Bedmond Road, north of Bunkers Lane in Bedmond, Nash Mills and comprises the southern section of a large area of arable land. The northern section of land is also owned by Dacorum Borough Council but does not form part of the application site (it is outlined in blue). To the very north of the application site is an existing access track which leads to the fields to the west (Bunkers Lane Park).

The site abuts Bunkers Lane Open Park to the west which is public amenity land and incorporates Chambersbury Wood. To the north of the site is a residential area of Leverstock Green (Woodfield Drive).

Proposal

The application is for the change of use of the land from agricultural to cemetery. The proposal seeks consent for the provision of a burial ground to include service building, toilets, visitors room, reception and administration office and staff facilities along with a machinery store and workshop. An external soil storage area would be provided adjacent to the storage building. There will be provision for 80 car parking spaces. A dedicated crossing point would also be provided across Bedmond Road at the site access leading to a new footpath link into the site. Associated landscaping is also proposed.

The proposal allows for the phased development of site. The first phase being the northern area and would include 8 acres of land to accommodate 50 years of burials. It is anticipated that approximately 100 burials will take place at the site every year. In the future if demand requires it the southern section (the remaining 4.8 hectares) would be expanded into.

Referral to Committee

The application is referred to the Development Control Committee as the land is owned by Dacorum Borough Council.

Planning History

Policies

National Policy Guidance

National Planning Policy Framework (NPPF)
Circular 11/95

Adopted Core Strategy

NP1 - Supporting Development
CS1 - Distribution of Development
CS2 - Selection of Development Sites
CS3 - Managing Selected Development Sites
CS5 - The Green Belt
CS8 - Sustainable Transport
CS9 - Management of Roads
CS11 - Quality of Neighbourhood Design
CS12 - Quality of Site Design
CS23 - Social Infrastructure
CS25 - Landscape Character
CS26 - Green Infrastructure
CS28 - Renewable Energy
CS29 - Sustainable Design and Construction
CS30 - Sustainability Offset Fund
CS31 - Water Management
CS32 - Air, Water and Soil Quality

Saved Policies of the Dacorum Borough Local Plan

Policies 10, 12, 13, 15, 18, 19, 21, 22, 23
Appendices 1, 2, 3, 4, 5,

Supplementary Planning Guidance / Documents

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)

Summary of Representations

Nash Mills Parish Council

Awaiting comments.

Hertfordshire Highways - **Recommend Conditional Approval.**

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 does not wish to restrict the grant of permission subject to the following conditions:

Decision

Hertfordshire County Council (HCC) as Highway Authority does not wish to raise an objection to the proposed development, subject to the following conditions.

Conditions

Condition 1: Construction Traffic Management Plan

Construction of the development hereby approved shall not commence until a Construction

Management Plan has been submitted to and approved in writing by the local planning authority. The plan should consider all phases of the development including the demolition of the existing extensions, any excavation works required and the construction phase of the development. 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. Traffic management requirements;
- c. Construction and storage compounds (including areas designated for car parking);
- d. Siting and details of wheel washing facilities;
- f. Cleaning of site entrances, site tracks and the adjacent public highway;
- g. Timing of construction activities 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.

Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way.

Condition 2: Swept Paths

Prior to the commencement of any part of the development, swept path drawings are required to demonstrate that a refuge vehicle safely entering and manoeuvring within to depart the site in a forward gear.

Reason: In order to protect highway safety and the amenity of users of the site.

Condition 3: Servicing and Delivery Plan

Prior to commencement of the development, the applicant shall submit a Servicing and Delivery Plan. This plan is to be submitted and approved in writing by the Local Planning Authority. The Servicing and Delivery Plan shall contain the delivery and servicing requirements (including refuse collection) for the proposed use, a scheme for coordinating deliveries and servicing for the proposed development, areas within the development site that will be used for loading and manoeuvring of delivery and servicing vehicles, and access to / from the site for delivery and servicing vehicles. As part of the servicing and delivery plan, the applicant will need to highlight how refuse collection will be undertaken as there is a height restriction over the existing access which may prevent refuse vehicles from entering the site. Details on the arrangements, including any proposals to relocate the height restriction, should be provided.

Reason: In the interest of maintaining highway efficiency and safety.

S106 Agreement / 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), contributions may be sought for maintaining or widening the existing footway along Bedmond Road, as the applicant proposed to provide a crossing from the site to this footway.

Description of the Proposal

The application is for the Change of Use for Land to the Southwest of Bedmond Road from agricultural to a cemetery. The proposal is for phase 1 of the site's development and would include 8 acres of land to accommodate 50 years of burials. It is anticipated that approximately 100 burials will take place at the site every year.

The proposed site would include service and ancillary buildings, internal roads, walkways and 80 car parking spaces. A dedicated crossing point would also be provided across Bedmond Road at the site access leading to a new footpath link into the site. Associated landscaping is also proposed.

Site Description

The site is currently comprised of agricultural land and is approximately 8 acres in size. There is

an existing vehicular access point to the site from Bedmond Road. Bedmond Road is a C class secondary distributor road with a speed limit of 40mph in the vicinity of the site, dropping to 30mph approximately 75m north of the site.

Phase 1 of the development is on agricultural land south of the existing access. The site is bordered by agricultural land intended for future public leisure development to the north, Bedmond Road to the east, agricultural land intended for cemetery expansion to the south and Bunker's Park Open Space to the west.

History

Pre-application advice from HCC as highway authority was sought for the proposed development. The comments from HCC were based on a site visit and provided a generic overview of the site as well advice on what may be required as part of a full application.

Analysis

The applicant has provided a Transport Statement (TS) as part of the application package. Associated drawings have also been provided.

Policy

A number of relevant national and local transport policies have been reviewed as part of the development proposals. The policies included in the TS are:

- National Planning Policy Framework;
- The Manual for Streets
- The Manual for Streets 2
- The Design Manual for Roads and Bridge

Due to the size of the proposals this is considered acceptable; however, the inclusion of review of the following key policy documents would have been beneficial to the application:

- National Planning Practice Guidance (NPPG)
- Dacorum Borough Council Core Strategy
- Dacorum Borough Council Local Plan
- Hertfordshire County Council's Highway Design Guide 3rd Edition
- Hertfordshire County Council Local Transport Plan 3, 2013 - 2031

Trip Generation and Distribution

A Transport Statement (TS) has been provided as part of the application to support the proposed development.

Trip Generation

Existing Traffic Flows

To consider the existing traffic flows on Bedmond Road a 7 day classified traffic volume survey was undertaken 17th June 2017 - 23rd June 2017. The results of the two-way flows are summarised below:

- Weekday Average: 9556
- Saturday: 7241
- Sunday: 6132
- 7 Day Total: 61153

Existing Trip Generation

As the site is an agricultural site, it can be considered that the existing trip generation is negligible and it is robust to assume 0 trips are generated by the site.

Proposed Trip Generation

Due to the nature of the proposed site as being a cemetery, there is no TRICS data available to assess the likely trip generation of the proposals. Therefore, applicant has utilised the results of a two week traffic survey of traffic movements at a comparable site - the Redstone Cemetery, in Redhill, Surrey.

It stated in the TS that the Redstone Cemetery accommodates approximately 150 burials per

year, compared to the 100 burials per year expected at the proposed site. It is stated that this ensures a robust assessment and that a 'worst-case' scenario is considered. This is considered an acceptable assumption. It is also assumed by the applicant that all trips to the site will be by car, this again ensures a 'worst-case' scenario is considered and is considered an acceptable assumption.

The traffic survey at Redstone Cemetery was undertaken for a two week period within May and June 2016. On weekdays, the number of vehicles arriving at the site varied from between 39 vehicle to 75 vehicles. Of these vehicles, the number arriving specifically for a funeral varied from between 9 vehicles and 20 vehicles. The highest number of vehicles arriving at the cemetery was recorded on Thursday 26th May 2016, when 150 two-way trips were recorded at Redstone Cemetery. The figures from this day have been used to forecast the traffic flows for the proposed development.

Impact on the Highway

Net Impact Assessment

The worst case scenario of 150 two-way trips represents 1.6% increase of the existing traffic flows on Bedmond Road. It is also stated in the TS that the majority of vehicle movements associated with the cemetery would be outside of peak network times. However, this is not demonstrated in the supplied data.

The applicant also considered the wider implications of the additional traffic generated by the proposed cemetery. Using 2016 Department for Transport (DfT) transport statistics for the A4147 and A414, the applicant determined that the additional 150 trips would equate to an increase in traffic on the respective highways by 0.9% and 0.4%. It is demonstrated that the net impact on traffic in the area would be negligible.

Therefore, it is demonstrated that the proposed cemetery would not have a detrimental impact on the operation of the highway.

Junction Assessment

Junction assessment has not been provided as part of the Transport Statement. This is considered acceptable as the applicant has demonstrated that the proposed development would not have a net impact on the local highway greater than 5%.

Road Safety

A review of Personally Injury Collisions (PICs) has been undertaken as part of the application. The review of PICs covered the five year period from 2012 to 2016. The review showed that no collisions have occurred on Bedmond Road in the vicinity of the site during the most recent five year period. The closest recorded collisions to the site are at the staggered junction of Bunkers Lane / Blackwater Lane. The review of PIC data shows that there is no existing safety issues in the vicinity of the site which would be exacerbated by the proposed development.

Highway Layout

Vehicle Access Arrangements

The site will be accessed via the existing junction with Bedmond Road. The access would lead to an internal road network which the applicant states has been provided in accordance with standards set out in the Design Manual for Roads and Bridges.

Pre-application advice from HCC suggested that visibility splays of 66m x 2.4m should be possible in both directions from the existing access point. Drawings provided by the applicant show that this visibility splay is possible, subject to the trimming back of boundary vegetation. Maintenance of the visibility splays should be conditioned as part of any planning permission.

Pedestrian Access

A dedicated crossing point is proposed on Bedmond Road, as well as a footpath link into the site. The existing footway on Bedmond Road is only provided on the east side of the road and is a narrow path that appears to be overgrown. Improvements would be sought for the provision of standard width footway along the eastern edge of highway to ensure that the site is accessible to all users.

Refuse and Servicing Arrangements

The drawings provided by the applicant show that a waste and soil storage area will be provided at the north east boundary of the site. However, no details on the servicing arrangements have been provided as part of the application. It is also noted that the existing access arrangements include a height restriction, the application will need to detail how the refuse collection and servicing would take place as the height restriction may affect a refuse vehicle entering the site. The height restriction, at present, is not located far enough within the site to allow for a refuse vehicle to leave the highway safely and not obstruct Bedmond Road. A Servicing and Delivery plan should be submitted and agreed with the LPA prior to commencement of the works. The plan should detail the delivery and servicing requirements and arrangements of the proposed development.

Swept path drawings should also be provided to demonstrate that refuse and servicing vehicles are able to safely enter the site in a forward gear and manoeuvre within to depart in a forward gear.

Swept Path Analysis

Swept path assessments have not been provided as part of the application and will be required to demonstrate that refuse, servicing and delivery can occur within the site and that a refuse vehicle can safely enter the site and manoeuvre within the depart in a forward gear.

Road Safety Audit

A Stage 1 Road Safety Audit may be required for the proposed development for the proposed pedestrian crossing and if any changes are required for the access.

Parking

Car Parking Provision

It is proposed that 80 car parking spaces would be provided at the cemetery, including 7 designated disabled spaces. The data from the Redstone Site shows that the highest number of vehicles arriving for a funeral was 20 vehicles. However, it is stated that the provision of 80 car parking spaces is based on available space, rather than the expected number of visitors. It is considered by the applicant that the provision of 80 parking spaces will ensure that there is no overspill onto the surrounding highway network. This is considered acceptable to HCC. However, the suitability of parking provision will ultimately be the decision of the LPA.

Disabled Parking

It is proposed that seven designated disabled spaces are provided at the development. According to standards set out by DBC, 3 spaces or 6% of the total capacity (whichever is greater) should be provided at the proposed development. The provision of seven designated disabled spaces would meet these standards. However, the suitability of disabled parking provision will ultimately be the decision of the LPA.

Car Parking Layout

The car parking layout is shown on the site plan provided as part of the application. The drawing shows that overflow parking will be provided to the east of the main car park. It is stated in the TS that the internal layout has been designed in accordance with standards such as Design Manual for Roads and Bridges.

Swept Path assessments should be provided to demonstrate that two large cars are able to pass each other in the car park and are able to enter and leave car parking spaces safely.

Cycle Parking

There is no designated cycle parking proposed for the development. There are no cycle parking standards set out by DBC for a cemetery land use. Therefore, as there are no cycle provisions on the highway network and the highway is not considered suitable for cycling, this is considered acceptable. However, the suitability of cycle parking provision is ultimately the decision of the LPA.

Accessibility

Bus Services

The nearest bus stops to the proposed development site are approximately 200 metres north west of the access on Bedmond Road. The bus stops are served by route Sapphire 320 which provides access to areas such as Boxmoor, and Hemel Hempstead for the northbound direction and Berry Lane Estate and Watford for the southbound direction. Alternative bus stops are available approximately 350 metres south east of the site at Bedmond Road's junctions with Bunkers Lane and Pimilico. These bus stops are served by the same service as the bus stops to the north west.

Rail Service

The nearest railway station is Apsley Station approximately 2.3 miles to the south west, an approximate 40 minute walk from the site access. The station provides access to destinations such as London Euston and Tring.

Walking

There is an existing footpath along the east side of Bedmond Road. The footway seems to be narrow and overgrown in the vicinity of the site. There is no street lighting in the vicinity of the site access. It is proposed that a designated pedestrian crossing point is provided on Bedmond Road as well as a footpath link into the proposed site. In addition to the proposed crossing, improvements would be sought for the provision of formalised standard width footway along the eastern edge of highway to ensure that the site is accessible to all users.

Cycling

There are no designated cycling facilities in the vicinity of the site. The speed limit on the Bedmond Road is 40mph in the vicinity of the site which is not considered suitable for cycling.

Travel Plan

Due to the nature of the development a Travel Plan would not be required.

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, a Section 184 or 278 agreement, whichever is most appropriate, will need to be secured and approved with 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), contributions may be sought for maintaining or widening the existing footway along Bedmond Road, as the applicant proposed to provide a crossing from the site to this footway.

Summary

HCC as highway authority has reviewed the application submission and does not wish to raise objection to the proposed development, subject to suitable conditions.

Crime Prevention

No Objection - the following security questions should be considered;

Security

- **Boundary** – A secure boundary (Fencing) would be required
- **Control Access / Access control signage** - to deter unauthorised entry
- **CCTV**- There is little natural surveillance
- **Lights** – Many old cemeteries are not lit, however the more modern ones are ,lighting will need to considered for the car park and visitor buildings.
- **Visitor Buildings** – Secure doors/ locks and windows

NATS

No Objection

Environment Agency

- **Recommend conditional approval.**

Conditions are included on any planning permission granted.

Condition 1 All burials in the cemetery shall be:

- a minimum of 50 m from a potable groundwater supply source;
- a minimum of 30 m from a water course or spring;
- a minimum of 10 m distance from field drains; and
- not in standing water and the base of the grave must be above the local water table.

Reasons To protect the quality of groundwater in the local area. Groundwater is particularly sensitive in this location because the proposed development site is within Source Protection Zone 3, meaning it is used for drinking water supplies, and is located upon a Principal Aquifer. In addition, the Thames River Basin Management Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery; without this condition, the proposal could cause deterioration of a drinking water protected area located within the Mid-Chilterns Chalk groundwater body.

This is in line with your Local Plan policy CS31 to avoid damage to Groundwater Source Protection Zones, and also paragraph 109 of the National Planning Policy Framework to prevent unacceptable risks to groundwater resources.

Advice on Condition 1

The developer should conduct a protected rights survey to ensure that no licensed or unlicensed groundwater abstraction (to include abstractions from springs, wells and boreholes) in the adjacent areas will be derogated in either quality or quantity as a result of this development. The Environment Agency does not keep records of where private water supplies are located. These details are held by local authorities and the Drinking Water Inspectorate.

Condition 2 If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reasons

To protect the quality of groundwater in the local area as no investigation can completely characterise a site. Groundwater is particularly sensitive in this location because the proposed

development site is within Source Protection Zone 3, meaning it is used for drinking water supplies, and is located upon a Principal Aquifer. In addition, the Thames River Basin Management Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery; without this condition, the proposal could cause deterioration of a drinking water protected area located within the Mid-Chilterns Chalk groundwater body. This is in line with your Local Plan policy CS31 to avoid damage to Groundwater Source Protection Zones, and also paragraph 109 of the National Planning Policy Framework to prevent unacceptable risks to groundwater resources.

Condition 3 The development hereby permitted may not commence until such time as a scheme to agree both surface water drainage and the management of any effluent generated by the proposed welfare facilities has been submitted to, and approved in writing by, the local planning authority. The scheme shall be implemented as approved.

Reasons To ensure that the proposed surface water drainage and the management of any effluent generated by the proposed welfare facilities does not harm groundwater resources. Groundwater is particularly sensitive in this location because the proposed development site is within Source Protection Zone 3, meaning it is used for drinking water supplies, and is located upon a Principal Aquifer. In addition, the Thames River Basin Management Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery; without this condition, the proposal could cause deterioration of a drinking water protected area located within the Mid-Chilterns Chalk groundwater body. This is in line with your Local Plan policy CS31 to avoid damage to Groundwater Source Protection Zones, and also paragraph 109 of the National Planning Policy Framework to prevent unacceptable risks to groundwater resources.

Trees and Woodlands

recommend conditional approval.

Planting Plan (CDS_BED_DCR_06 01)

- The proposed planting scheme is very much suited to the site and its intended use.
- The utilisation of 61% native planting is welcomed on a site bordered by natural open spaces and fields. The intention to plant native Hornbeam (*Carpinus betulus*) and native mixed species hedges towards to the front of the site will be aesthetically pleasing and also link with surrounding vegetation / species on adjacent land.
- It is proposed to plant a number of tree avenues, again of native provenance. The use of *Tilia cordata*, Small-leaved Lime, will be an appropriate species along the site frontage, forming an uniform green line with visual impact, that is also easy to maintain.
- A Wild Cherry avenue is also proposed, this line running within the site. During spring these trees will be covered with blossom, adding subtle colour to the vehicular section of the plot.
- The planting of 41 fruit trees of local provenance will both be visually attractive and of benefit to wildlife, especially pollinating insects.
- Species diversity proposed is good, including those suited to meadow and pond settings. These environments are to be found locally but not in large numbers, and so any addition to their number will enhance their viability within the area.
- Non-native trees are proposed where their aesthetic impact, through colour, texture or size, will enhance the particular use of that part of the site, e.g. Tulip trees (*Liriodendron tulipifera*) to provide height, colour and a focal point for the cremated remains area.
- The overall planting plan is impressive in its design.

Landscape and Ecology Statement and Management (August 2017)

- The cutting back of “vegetation in order to maximise visibility at the entrance and exit to the site on Bedmond Road” is acceptable.

- The use of Hornbeam hedgerows within the site providing year round shelter, roosting, nesting and foraging opportunities for wildlife is welcomed.
- The statement that “it is not proposed to remove any existing trees on site” is acceptable.
- Restoration of existing hedgerows through mitigation planting of native species is acceptable.
- The statement “all mature trees on site should be protected during construction following BS5387:12” is inaccurate. All trees should be protected prior to any works on site, not just ‘construction’ activity. Protection should be place before any site equipment is delivered and unloaded, and before any ground works take place. The British Standard to which work must conform is BS5837:2012, and not as stated.
- Tree planting should conform with British Standard 8545:2014 ‘Trees: from nursery to independence in the landscape – Recommendations’, not the standards listed.
- In hot, dry months from April to September, tree watering should occur far more regularly than proposed. To ensure tree establishment and survival, it may be necessary to put up to 20 litres of water per week onto young tree bases.

As the manager of Bunkers Park open space, the adjacent site, I would also make a number of points in relation to the vehicular access shared by both sites.

- I would advise that the height barrier at the junction of Bedmond Road is retained, although I recognise that I haven’t seen information relating to its removal. The access road and existing car park are frequently targeted by persons wishing to fly-tip, race cars around the park or move caravans into the site temporarily.
- To ensure the cleanliness of the cemetery access road, it would be necessary to install the same hard surface along the entire length of the access road and across the car park for users of the open space.
- The installation of a smooth tarmac access road with roundabout may become attractive to anti-social behaviour with vehicles racing up and down. In addition to the retention of the height barrier, it may be warranted to install speed bumps wherever possible. If this is not suited to the first section of roadway used by hearses, it would definitely be suited to the section between the proposed roundabout and the open space car park.

Strategic Planning & Regeneration

Previous comments have been made as part of pre-application 4/00214/17/PRE which remain relevant with regards to the planning policy position. For completeness our previous comments are shown below.

Since these pre-application comments were made, the Site Allocations DPD has been adopted by the Council on 12th July 2017.

(i) Green Belt

Normally a new-building is inappropriate development in the Green Belt. Although we note that the NPPF (para. 89) states that there are exceptions, the one relevant to this proposal is:

- *provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it*

Therefore, Core Strategy Policy CS5 (Green Belt) (a) is also relevant in this case, subject to the proposal being considered to have no significant impacts on the character and appearance of the countryside (part (i)). It is for the case officer to determine whether parts of the proposal would benefit from these NPPF exceptions.

This proposal includes wider changes on the site, especially in terms of the car park and use of the land which would require very special circumstances to be satisfied. The proposal would add hard surfacing, lighting columns and other structures to the site; therefore, the openness of the Green Belt could be affected.

We note that the built development proposed is relatively compact in size and is single storey. This and the car parking area are concentrated in the northern part of the site to minimise its impact. These points are welcomed.

(ii) Car and cycle parking provision

Saved Policy 51 (Development and Transport Impacts), Policy 57 (Provision and management of parking) and Policy 58 (private parking provision) of the Dacorum Borough Local Plan 1991-2011 should be complied with to ensure the additional development meets its demand for parking. The proposal would also need to have regards to the car parking standards in saved Appendix 5 (Policies CS8(h) and CS12(b)), although there are no specific standards identified for a cemetery.

(iii) Conclusion

We welcome the delivery of the cemetery-element of proposal MU/5 this application represents. We recognise a number of benefits that the scheme will bring locally and in meeting longer term needs for burial spaces, and are supportive of the proposed development in principle. However, we accept that a careful assessment on the scale of the development and its impact on the openness and character of the Green Belt is still required.

Herts and Middlesex Wildlife Trust

One of the stated objectives of the scheme is to create a more diverse ecology with flower rich grassland. However the landscape proposals show large areas of amenity grass and meadow grass to be created. These could be made far more visually interesting and much better for wildlife by replacing with a flowering lawn wildflower and grass mix. This can be maintained short or left to grow longer and will still produce carpets of native wildflowers among the grass. A suitable mix is Emorsgate Seeds EL1 but wildflower turfs are also available. HMWT recommend that the plans are altered in this way to improve the opportunities for biodiversity.

Herts Archaeology

Recommend Conditional Approval

“The site is not in an Area of Archaeological Significance, and no heritage assets of archaeological or historic interest relating to the application site are recorded on the County Historic Environment Record.

However, the site is of substantial size and is in a situation favourable to settlement. It overlooks the valley of the River Gade, to the west, and formed part of the hinterland of Roman Verulamium, to the east. The area is known to have been densely settled in the Late Iron Age and Roman periods. Both Bedmond Road and Bunkers Lane are surviving parts of a ‘ladder-like’ pattern of roads and trackways in the area that date to at least the medieval period, but which may have much earlier origins.

I therefore believe that the proposed development site possesses moderate potential for heritage assets to be present, and it is likely that should a planning application be submitted that this office would recommend that provision should be made, via appropriate conditions, to mitigate the impact of the development.”

I believe therefore that the proposed development is such that it should be regarded as likely to

have an impact on heritage assets of archaeological interest and I recommend that the following provisions be made, should you be minded to grant consent:

1. A programme of geophysical survey of the proposed development site, carried out by an appropriately qualified specialist,
2. A programme of archaeological trial trenches,
3. And such appropriate mitigation measures indicated as necessary by the results of the evaluation.

These may include:

- a) the preservation of any archaeological remains *in situ*, if warranted, by amendment(s) to the design of the development if this is feasible;
- b) the appropriate archaeological excavation of any remains before any development commences on the site;
- c) the archaeological monitoring and recording of the ground works of the development, including foundations, services, landscaping, access, etc. (and also including a contingency for the preservation or further investigation of any remains then encountered);
- d) 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 the results, as appropriate;
- e) such other provisions as may be necessary to protect the archaeological interests of the site.

Contaminated Land Officer

The site is located within the vicinity of potentially contaminative former land uses (infilled ponds and cemetery). There is the potential that these features may be producing ground gas, and as such there may be a plausible pollutant linkage associated with the generation, migration and ingress of gas into the proposed new building. I recommend that the contamination conditions (CONT1 and CONT2) be applied to this development should permission be granted. For advice on how to comply with this condition, the applicant should be directed to the Council's website (www.dacorum.gov.uk/default.aspx?page=2247).

Response to Neighbour Notification / Site Notice / Newspaper Advertisement

Awaiting expiration of neighbour notification period.

25 Silverthorn Drive -

- I am the Co-ordinator for the Friends of Bunkers Park and personally welcome the application as long as the road to the car park for Bunkers Park is made up to an acceptable standard with Tarmac or similar hard wearing surface and the car park itself is also made up and extended as in the summer the car park is often full and cars park in the roadway.

There are concerns that vans and trailers use the current roadway which is why there is a height restriction enforced by a physical barrier. This does need to remain in place or be moved further down the road after the proposed entrance to the cemetery as there has been fly tipping in the past and the barrier has also been damaged by attempts to enter the road by high sided trucks.

Can we be advised of the plans for the car park as we are to position an information board and would not want to move it unnecessarily.

Considerations

Policy and Principle

The site is situated within the Green Belt (Policy CS5) and is designated as a mixed use site MU/5 (Bunkers Park, Bunkers Lane) in the adopted Site Allocations DPD. The designation proposes a new leisure space and cemetery.

There is an identified need to plan for future burial space, particularly in the Hemel Hempstead area of the Borough. Therefore, in addition to existing space at Woodwells Cemetery, land at Bunkers Park has been identified to deliver a mix of leisure uses and cemetery space (Proposal MU/5). The principle of the development in terms of it delivering on elements of Proposal MU/5 and in the scheme meeting the future need for burial space in the town are therefore welcomed.

As stated, the site is allocated as a mixed leisure / cemetery use. The current proposal relates only to the cemetery use. Whilst it would be preferable for a comprehensive scheme coordinating the different uses across the site, the plans submitted clearly show an acceptable area of land to the north that has been retained for leisure purposes. The cemetery development would not preclude the delivery of the leisure use at a later date. The design and access statement sets out that the size of the proposed cemetery has been determined by the burial rates and the duration the Council wish the cemetery to be active for. It is estimated that the site would expect 100 burials per year. Phase 1 occupying the northern part of the site (3.8 hectares) has space for 3,600 graves giving 36 years of burial space and 1846 cremated remains plots. The southern part of the site would be available for future expansion as and when needed. The remaining land to the north would be available for leisure uses in accordance with the Site Allocations DPD.

By its nature the majority of the cemetery site would remain open and free from buildings. The proposal does however include the construction of a building and other facilities (hard surfacing for parking, lighting, etc) to support the cemetery use. The provision of new buildings in the Green Belt would normally amount to inappropriate development, however para 89 of the NPPF sets out clear exceptions to this. Of relevance is;

- *provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it*

The buildings, and other facilities are considered essential facilities for the day to day running of the cemetery as set out above. There is sound justification for the proposed buildings / facilities, and their scale directly relates to the size of the cemetery and predicted yearly burials. The building and ancillary facilities are thus acceptable in principle provided they preserve the openness. There are several factors that ensure they preserve the general openness of the area and do not conflict with the purposes of including land within the Green Belt, these together with the sites formal allocation amount to very special circumstances.

The proposal is therefore considered acceptable subject to a detailed assessment of its impact.

Scale, Layout, Design and Effects on appearance of area / countryside / Green Belt.

Only small scale buildings should be acceptable on the site in accordance with policy CS5 of the Core Strategy.

The proposal has been designed to have a minimal impact on the character, appearance or openness of the Green Belt. Due to the nature of the proposed use, the majority of the site will remain open and free from buildings. It is proposed to introduce a service building, toilets, visitors room, reception and administration office and staff facilities along with a machinery store and workshop. However these are clustered to the north-east of the site adjacent to the existing access, are single storey in height and modest in size and scale. The size and scale of the buildings proposed is commensurate to the operational and logistical requirements of the cemetery. It is also proposed to introduce an area of hard surface for the parking of circa 80 vehicles and erect lighting columns. Whilst these features would all amount to inappropriate development, which by definition is harmful, given their sensitive siting within the site, the

relatively flat topography of the area, and the comprehensive planting scheme which covers the entire site, these would not be readily visible from wider views and would not cause visual harm. The site would retain its rural appearance and assimilate with the surrounding open countryside setting.

The proposed cemetery would provide for around 100 burials a year and in association with this the design and access statement indicates the need for a toilet/facilities block, external soil storage area and car parking. There is sound justification for the proposed buildings / facilities, and the scale of new buildings is considered to relate to the size of the cemetery and predicted yearly burials. The buildings, at the scale proposed, would not have significant adverse visual implications for the appearance of the site. The site would not be intrusive in the countryside even in the early years before planting has matured and would not significantly reduce the open character and appearance of the landscape.

Impact on Trees and Landscaping

The application is supported by a comprehensive planting scheme and a management plan. The Woodlands Officer is satisfied with the plans and considers the overall planting plan impressive in its design. The proposed development will be screened by the provision of additional landscaping around the periphery of the site and it is also proposed to create an attractive landscaped setting within the cemetery. The provision of landscaping to the site is beneficial in terms of the impact of development upon the visual amenities of the countryside and protecting and improving biodiversity on the site and its immediate surroundings.

The proposed development will result in the removal of a small amount of vegetation along the existing highways verge to provide the necessary visibility splays in accordance with the advice of the County Highways section. Whilst unfortunate the Woodlands Officer considers this acceptable, especially given the substantial planting proposed including the restoration of existing hedgerows.

Slight concern has been expressed with regard to the watering schedule set out in the management plan, during tree establishment stage and the British Standards referred to. A condition / informative has been included to cover these areas.

Impact on Highway Safety

The proposal would not have an adverse impact on highway safety.

A full transport statement accompanies the application. This statement draws on data and evidence from a similar sized cemetery at a comparable site in Surrey and has also been informed and makes assumptions based on current movements at the Council's existing Woodwells site. Herts County Council Highways are satisfied with its content and findings subject to the imposition of conditions. The transport statement identifies that the development would have a net impact on the local highway of less than 5% and that the proposed access arrangements provide the necessary vehicle and pedestrian visibility splays. The development would not have a significant adverse impact on the safety or operation of the adjacent highway.

The proposal also includes a designated pedestrian crossing point on Bedmond Road and improvements for the provision of formalised standard width footway along the eastern edge of highway to ensure that the site is accessible to all users. These works are welcomed, however, Herts County Council Highways do not consider them necessary as a direct result of the proposal. As such, their inclusion in a legal agreement or condition would not meet the necessary tests. An informative has been included advising the applicant that these elements would be subject to a Section 184 or Section 278 Agreement (works on public highway) with the County Council.

Impact on Neighbours

Given the nature of the proposal and the fact that the site is separated some distance from all residential properties, the change of use of the land and the provision of modest service buildings would not have a significant adverse impact on adjacent dwellings in terms of light, privacy, visual intrusion, noise or disturbance. Given the proposed use as a cemetery, the majority of the land would remain open and free of development. A small service building is proposed, but its siting to the north-east of the site, adjacent to the existing access and well over 150m from all existing residential properties, would minimise or eliminate any adverse impact. In addition the building is single storey, modest in size and scale, and would from most vantage points be entirely screened by the proposed landscaping. The landscaping proposed has been concluded as impressive in its design and should therefore provide an attractive outlook for existing residents.

The proposal complies with Policy CS12 in this regard.

Refuse / Servicing

Saved Policy 129 of the Local Plan seeks to ensure that development has adequate storage for refuse and recycling. The submitted plans clearly illustrate a bin storage area adjacent to the service building. Notwithstanding this additional information is required to ensure these facilities can be accessed. A condition will be imposed requiring additional information.

RECOMMENDATION - That determination of the application be **DELEGATED** to the Group Manager, Development Management and Planning , following the expiry of the consultation period and no additional material considerations being raised, with a view to grant for the following reasons.

- 1 **The development hereby permitted shall be begun before the expiration of three years from the date of this permission.**

Reason: To comply with the requirements of Section 91 (1) of the Town and Country Planning Act 1990 as amended by Section 51 (1) of the Planning and Compulsory Purchase Act 2004.

- 2 **The development hereby permitted shall be constructed in accordance with the materials specified on the approved drawings.**

Reason: To ensure a satisfactory appearance to the development in accordance with Policy Cs12 of the Core Strategy.

- 3 **All burials in the cemetery shall be:**
 - a minimum of 50 m from a potable groundwater supply source;
 - a minimum of 30 m from a water course or spring;
 - a minimum of 10 m distance from field drains; and
 - not in standing water and the base of the grave must be above the local water table.

Reasons To protect the quality of groundwater in the local area. Groundwater is particularly sensitive in this location because the proposed development site is within Source Protection Zone 3, meaning it is used for drinking water supplies, and is located upon a Principal Aquifer. In addition, the Thames River Basin Management

Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery; without this condition, the proposal could cause deterioration of a drinking water protected area located within the Mid-Chilterns Chalk groundwater body.

This is in line with your Local Plan policy CS31 to avoid damage to Groundwater Source Protection Zones, and also paragraph 109 of the National Planning Policy Framework to prevent unacceptable risks to groundwater resources.

Advice on Condition 1

The developer should conduct a protected rights survey to ensure that no licensed or unlicensed groundwater abstraction (to include abstractions from springs, wells and boreholes) in the adjacent areas will be derogated in either quality or quantity as a result of this development. The Environment Agency does not keep records of where private water supplies are located. These details are held by local authorities and the Drinking Water Inspectorate.

- 4 **If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.**

Reasons; To protect the quality of groundwater in the local area as no investigation can completely characterise a site. Groundwater is particularly sensitive in this location because the proposed development site is within Source Protection Zone 3, meaning it is used for drinking water supplies, and is located upon a Principal Aquifer. In addition, the Thames River Basin Management Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery; without this condition, the proposal could cause deterioration of a drinking water protected area located within the Mid-Chilterns Chalk groundwater body. This is in line with your Local Plan policy CS31 to avoid damage to Groundwater Source Protection Zones, and also paragraph 109 of the National Planning Policy Framework to prevent unacceptable risks to groundwater resources

- 5 **The development hereby permitted may not commence until such time as a scheme to agree both surface water drainage and the management of any effluent generated by the proposed welfare facilities has been submitted to, and approved in writing by, the local planning authority. The scheme shall be implemented as approved.**

Reasons To ensure that the proposed surface water drainage and the management of any effluent generated by the proposed welfare facilities does not harm groundwater resources. Groundwater is particularly sensitive in this location because the proposed development site is within Source Protection Zone 3, meaning it is used for drinking water supplies, and is located upon a Principal Aquifer. In addition, the Thames River Basin Management Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery; without this condition, the proposal could cause deterioration of a drinking water protected area located within the Mid-Chilterns Chalk groundwater body.

This is in line with your Local Plan policy CS31 to avoid damage to Groundwater Source Protection Zones, and also paragraph 109 of the National Planning Policy Framework to prevent unacceptable risks to groundwater resources.

- 6 **No development shall commence until a Construction Management Plan has been submitted to and approved in writing by the local planning authority. The plan should consider all phases of the development including any excavation works required and the construction phase of the development. 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. **Traffic management requirements;**
 - c. **Construction and storage compounds (including areas designated for car parking);**
 - d. **Siting and details of wheel washing facilities;**
 - f. **Cleaning of site entrances, site tracks and the adjacent public highway;**
 - g. **Timing of construction activities 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.**

Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way.

- 7 **Prior to commencement of the development, the applicant shall submit a Servicing and Delivery Plan. This plan is to be submitted and approved in writing by the Local Planning Authority. The Servicing and Delivery Plan shall contain the delivery and servicing requirements (including refuse collection) for the proposed use, a scheme for coordinating deliveries and servicing for the proposed development, areas within the development site that will be used for loading and manoeuvring of delivery and servicing vehicles, and access to / from the site for delivery and servicing vehicles (including swept path drawings). As part of the servicing and delivery plan, the applicant will need to highlight how refuse collection will be undertaken as there is a height restriction over the existing access which may prevent refuse vehicles from entering the site. Details on the arrangements, including any proposals to relocate the height restriction, should be provided.**

Reason: In the interest of maintaining highway efficiency and safety.

Reason: In order to protect highway safety and the amenity of users of the site.

- 8 **Prior to the commencement of the development hereby permitted a Phase I Report to assess the actual or potential contamination at the site shall be submitted to and approved in writing by the local planning authority. If actual or potential contamination and/or ground gas risks are identified further investigation shall be carried out and a Phase II report shall be submitted to and approved in writing by the local planning authority prior to the commencement of the development. If the Phase II report establishes that remediation or protection measures are necessary a Remediation Statement shall be submitted to and approved in writing by the Local Planning Authority. For the purposes of this condition:**

A Phase I Report consists of a desk study, site walkover, conceptual model and a preliminary risk assessment. The desk study comprises a search of

available information and historical maps which can be used to identify the likelihood of contamination. A simple walkover survey of the site is conducted to identify pollution linkages not obvious from desk studies. Using the information gathered, a 'conceptual model' of the site is constructed and a preliminary risk assessment is carried out.

A Phase II Report consists of an intrusive site investigation and risk assessment. The report should make recommendations for further investigation and assessment where required.

A Remediation Statement details actions to be carried out and timescales so that contamination no longer presents a risk to site users, property, the environment or ecological systems.

Reason: To ensure that the issue of contamination is adequately addressed and to ensure a satisfactory development.

- 9 **All remediation or protection measures identified in the Remediation Statement referred to in Condition 8 shall be fully implemented within the timescales and by the deadlines as set out in the Remediation Statement 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.

Informative:

Paragraph 121 of the NPPF states that all site investigation information must be prepared by a competent person. This is defined in the framework as 'A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation.'

Contaminated Land Planning Guidance can be obtained from Regulatory Services or via the Council's website www.dacorum.gov.uk

- 10 **No 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 an assessment of significance and research questions; and: www.hertfordshire.gov.uk**

1. The programme and methodology of site investigation and recording;
2. The programme and methodology of site investigation and recording as suggested by the archaeological 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 Archaeological Written Scheme of Investigation.

Reason: To ensure that reasonable facilities are made available to record archaeological evidence and to ensure no adverse archaeological implications in accordance with Policy CS27 of the Dacorum Core Strategy.

- 11 **i) Development shall take place in accordance with the Written Scheme of Investigation approved under condition (10).**
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 10 and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.

Reason: To ensure that reasonable facilities are made available to record archaeological evidence and to ensure no adverse archaeological implications in accordance with Policy CS27 of the Dacorum Core Strategy.

- 12 **All soft landscape works shall be carried out in accordance with the approved details. Notwithstanding the submitted landscaping plans all trees should be protected prior to any works on site. Protection should be place before any site equipment is delivered and unloaded, and before any ground works take place. The British Standard BS5837:2012 must be adhered to. All tree planting should conform with British Standard 8545:2014 ‘Trees: from nursery to independence in the landscape – Recommendations’. The works shall be carried out prior to the first use of the site.**

Reason: To ensure a satisfactory appearance to the development and to safeguard the visual character of the immediate area.

- 13 **Any tree or shrub which forms part of the approved landscaping scheme which within a period of five years from planting fails to become established, becomes seriously damaged or diseased, dies or for any reason is removed shall be replaced in the next planting season.**

Reason: To ensure a satisfactory appearance to the development and to safeguard the visual character of the immediate area.

- 14 **No development shall take place until full details of hard landscape works shall have been submitted to and approved in writing by the local planning authority. These details shall include:**

- **hard surfacing materials;**
- **means of enclosure, including height restriction barriers and security fencing;**
- **car parking layouts and other vehicle and pedestrian access and circulation areas;**
- **minor artefacts and structures (e.g. signs, lighting, cctv etc);**

The approved landscape works shall be carried out prior to the first use of the site hereby permitted.

Reason: To ensure a satisfactory appearance to the development and to safeguard the visual character of the immediate area.

- 15 **The development hereby permitted shall be carried out in accordance with the following approved plans/documents:**

HERITAGE STATEMENT
DESIGN AND ACCESS STATEMENT
SHEET 1 OF 2 TOPOGRAPHIC SURVEY
SHEET 2 OF 2 TOPOGRAPHIC SURVEY
CDS_BED_DCR_02_01
CDS_BED_DCR_06_01
CDS_BED_DCR_08_03
CDS_BED_DCR_03 REV 07
CDS_BED_DCR_11 REV 01
CDS_BED_DCR_12
VISUAL IMPACT ASSESSMENT
TRANSPORT STATEMENT
LANDSCAPE AND ECOLOGY STATEMENT
EXTENDED PHASE 1 HABITAT SURVEY
SUSTAINABILITY STATEMENT
FLOOD RISK ASSESSMENT

Reason: For the avoidance of doubt and in the interests of proper planning.