

## APPENDIX 1 – CONSULTEE REPONSES.

### HERTS FIRE AND RESCUE

I refer to the above mentioned application and am writing in respect of planning obligations sought by the County Council towards fire hydrants to minimise the impact of development on Hertfordshire County Council Services for the local community.

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. We reserve the right to seek Community Infrastructure Levy contributions towards the provision of infrastructure as outlined in your R123 List through the appropriate channels.

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 fire fighting facilities are provided on new developments. HCC therefore seek the provision of hydrants required to serve the proposed buildings by the developer through standard clauses set out in a Section 106 legal agreement or unilateral undertaking.

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.

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.

Section 106 planning obligation clauses can be provided on request.

#### Justification

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).

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 fire fighting 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;

Only those fire hydrants required to provide the necessary water supplies for fire fighting 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 reasonable related in scale and kind to the development.

Only those fire hydrants required to provide the necessary water supplies for fire fighting 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 instructions 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 provision.

## **HERTS COUNTY COUNCIL HIGHWAYS**

### **Proposal**

Demolition of a 4-storey office building. construction of 16-storey residential development featuring 305 apartments, on-site gym and leisure facilities, on-site coffee shop, roof garden and library/ observatory, internal arboretum, function room and underground parking facilities for 323 cars in an automatic car parking system with on-site electric car share.

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

#### **Decision**

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

SHC 02: Prior to the commencement of the development hereby permitted full details (in the form of scaled plans and / or written specifications) shall be submitted to and approved in writing by the Local Planning Authority to illustrate the following:

- i) Roads, footways, cycleways, foul and on-site water drainage.
- ii) Roads and footway.
- 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: In the interests of highway safety and operation and to ensure minimal residual cumulative impacts occur as a consequence of the proposed development.

Internal Layout: The applicant is required to utilise the proposed internal layout as presented in the drawing 'Mitigation Option 2: Layby and Additional Feeder Lane Arrangements' which was provided in the second TA Addendum for the original application reference '4/03441/15/MFA'. This was presented as a queue mitigation measure to satisfy that the queuing as a consequence of the Automatic Parking System (APS) will be contained within the site and will not encroach on the highway.

Reason: In the interests of highway safety and operation and to ensure minimal residual cumulative impacts occur as a consequence of the proposed development.

Highway Mitigation Measures: Prior to first occupation of the development, the applicant will be responsible for improvements to the highway network that will aim to ensure that the development will not have severe cumulative impacts to the highway network. The suggested mitigation measures will be agreed via S278 legal agreements and will include, at minimum, KEEP CLEAR road markings in front of Whiteleaf Road on London Road, optimise the operation of the existing SCOOT (Split Cycle Offset Optimisation Technique) traffic light computer control system and introduce MOVA (Microprocessor Optimised Vehicle Actuation) software at the Two Waters Road/ London Road signalised junction, and refresh Give Way markings on Whiteleaf Road. This is per the previous agreement as part of original application 4/03441/15/MFA.

Reason: In the interests of highway safety and to ensure minimal residual cumulative impacts occur as a consequence of the proposed development.

Car and Cycle Parking Management Plan: Prior to first occupation of the development, a Car and Cycle Parking Management Plan shall be submitted to and approved in writing by the local planning authority. It shall include the following:

- Details of car parking allocation and distribution;
- Details of the car club regarding the operation, management, and implementation scheme;
- Methods to minimise on-street car parking;
- A scheme for the provision and parking of cycles; and,
- Monitoring required of the Car and Cycle Parking Management Plan to be submitted to and approved in writing in accordance with a timeframe to be agreed by the local planning authority.

The Car and Cycle Parking Management Plan shall be fully implemented before the development is first occupied or brought into use, in accordance with a timeframe agreed by the local planning authority, and thereafter retained for this purpose.

Reason: In the interests of highway safety and to ensure sufficient available on-site car parking and the provision of adequate cycle parking that meets the needs of occupiers of the proposed development and in the interested of encouraging the use of sustainable modes of transport in accordance with Policies CS8 and CS12 of the Dacorum Core Strategy

(September 2013) and saved Policies 57 and 58 of the Dacorum Borough Local Plan 1991-2011.

SHC 38: Prior to the commencement of the development a monitoring programme to assess the level of traffic generation at defined intervals of occupancy shall be submitted to and approved in writing by the Local Planning Authority in consultation with Hertfordshire County Council as the Local Highway Authority. The monitoring programme shall be implemented as agreed unless the Local Planning Authority gives written approval to any variation in consultation with Hertfordshire County Council, the Local Highway Authority.

Reason: To ensure that agreed traffic levels are not breached and thus highway network is adequate to cater for the development proposed.

SHC 18: Prior to commencement of the development hereby permitted a visibility splay measuring 2.4 x 43 m shall be provided to each side of the access where it meets the highway and such splays shall thereafter be maintained at all times free from any obstruction between 600mm and 2m above the level of the adjacent highway carriageway.

Reason: In the interests of highway safety.

SHC 22: Prior to the commencement of the development hereby permitted sufficient space shall be provided within the site to enable a standard size servicing and or delivery vehicle to park, turn and re-enter the highway in a forward gear. This area shall be levelled, surfaced and drained in accordance with a detailed scheme submitted to and approved in writing by the Local Planning Authority, in consultation with the Highway Authority, and retained thereafter available for that specific use.

Reason: In the interests of satisfactory development and highway safety.

SHC 25: Development shall not commence until a scheme detailing provision for on-site parking for construction workers for the duration of the construction period has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented throughout the construction period.

Reason: To ensure adequate off-street parking during construction in the interests of highway safety.

SHC 26A: Prior to the commencement of any works a Construction Logistics Plan and Access Route which shall incorporate adequate provision for addressing any abnormal wear and tear to the highway shall be submitted to and approved in writing with the Local Planning Authority in consultation with Hertfordshire County Council Highway Authority together with proposals to control and manage construction traffic using the 'Construction Traffic Access Route' and to ensure no other local roads are used by construction traffic.

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

SHC 27A: No works shall commence on site until the details of wheel cleaning facilities for construction vehicles have been submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority.

Reason: To prevent extraneous material being deposited on the highway.

SHC 27B: For the duration of the construction period all traffic associated with the construction of the development permitted will use the approved wheel cleaning facilities provided referred to in condition SHC 27A.

Reason: To prevent extraneous material being deposited on the highway.  
S278 Agreement Any works within the highway boundary (including alterations to the footway and the proposed site access) will need to be secured and approved via a S278 Agreement with the HCC.

#### S106 Agreement and Contributions

A S106 Agreement will be required to secure the Construction and Logistics Plan and Travel Plan. Mitigation measures for the junctions will be required under a S106 Agreement. Additionally, planning obligations previously agreed as part of the agreed outline applications from 26 June 2015, and 19 July 2016, will still apply.

A Travel Plan for the residential 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 towards the County Council's costs of administrating and monitoring the objectives of the Travel Plan Statement and engaging in any Travel Plan Review.

#### 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.

AN4) Construction standards for works within the highway: All works to be undertaken on the adjoining highway shall be constructed to the satisfaction and specification of the Highway Authority, by an approved contractor, and in accordance with Hertfordshire County Council's publication "Roads in Hertfordshire - Highway Design Guide (2011)". Before works commence the applicant would need to apply to the Highway Authority to obtain their

permission and requirements. 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.

### Description of the Proposal

The proposed development includes the demolition of an existing 4 storey office building and the erection of a 17 storey residential building with the following uses:

- 305 residential flats:
- 177 x studio and 1bed flats
- 128 x 2 bed flats
- On-site gym/leisure centre, coffee shop, and function room
- Roof garden
- Internal arboretum
- Underground parking for 323 cars plus 5 above ground electric car parking spaces

The site is located at Symbio House, Whiteleaf Road, Hemel Hempstead. The site is on the south east side of Whiteleaf Road. On-street parking is not permitted on Whiteleaf Road; however, it is permitted on London Road to the west of the junction with Whiteleaf Road. Whiteleaf Road is an unclassified L2 local access road.

The site is located in a semi-industrial area of Hemel Hempstead. Adjacent land uses include the Arriva bus depot and a car yard.

The application is accompanied by a Transport Letter and it is stated in the Transport Letter than the Transport Assessment (TA) submitted as part of the permitted scheme on the site, 4/03441/15/MFA, should be referred to for previously approved findings.

### Permitted Scheme

As is mentioned through the Transport Letter that accompanies this planning application, the development has prior planning approvals and a permitted schemes exist. The most recent permitted scheme was given approval 19 July 2016 as part of an amendment.

The proposed development in the consented scheme includes the demolition of an existing 4 storey office building and the erection of a 16 storey residential building with the following uses:

- 272 residential flats:
- 12 x studio flats
- 119 x 1 bed flats
- 115 x 2 bed flats
- 26 x 3 bed flats
- On-site gym/leisure centre, coffee shop, and function room
- Roof garden
- Internal arboretum
- Underground parking for 318 cars

The proposed new building will be arranged as follows:

- Basement levels: Parking
- Ground floor: Reception, Coffee and Function room
- 1st floor: Gym, flats
- 2nd - 16th floor: Flats

The consented scheme had provided the relevant TRICS outputs as part of the Transport Assessment. The TRICS outputs provided were approved and the permitted scheme generated 87 total two way trips in the AM Peak and 90 two-way trips in the PM peak; however, there was a net impact of 68 trips in the AM peak hour and 73 trips in the PM peak hour.

The applicant provided a thorough review of queuing as a consequence of the proposed Automatic Parking System (APS) and suitable mitigation to ensure all queuing was kept within the site's boundaries.

#### Other Relevant History

- 4/02320/14/MOA: Construction Of 16-Storey And Four Basement Level Building Comprising Of Up To 208 Flats, Offices, Retail, Leisure Space And 228 Car Parking Spaces Following Demolition Of Existing Office (Class B1) Building (All Matters Reserved). This was granted planning permission in June 2015.
- 4/01044/14/OPA: Change of Use of Office Development (Class B1) To 17 Residential Units (Class C3). This was granted planning permission in July 2014.

#### Analysis

A Transport Letter has been prepared by Vectio Consulting on behalf of Lumiere Acquisitions in support of a planning application for the redevelopment of Symbio House at Whiteleaf Road, Hemel Hempstead. The Transport Letter states that it should be considered alongside the approved findings in the TA and subsequent Addendums provided as part of the planning application package for application reference 4/03441/15/MFA.

The policy documents reviewed as part of the TA include:

- National Planning Policy Framework (March 2012)
- Dacorum Core Strategy (September 2013)
- Dacorum Local Plan 1991-2011, Appendix 5

#### Trip Generation and Distribution

##### Trip Generation

The applicant has provided TRICS outputs as an Appendix in the Transport Letter. The TRICS outputs provided are not appropriate for the purposes of the assessment as they are not consistent with the TA submitted as part of the permitted scheme. The TRICS outputs consider trip rates which use a per bedroom rate instead of the previously agreed per dwelling rate. This results in a smaller trip generation for a higher number of dwellings as the proposals omit 3 bedroom bedrooms in favour of more one and two bedroom dwellings. Whilst it is considered appropriate to use a consistent approach, the impact of the additional dwellings is unlikely to have a negative impact on the highway network and therefore, is considered appropriate for the purposes of this assessment.

Due to the existing congestion in the area during peak hours, monitoring will be required for the revised scheme to ensure that the additional dwellings do not result in additional queuing that would impact the highway network.

##### Trip Distribution

Trip distribution information was not provided as part of the Transport Letter; however, the distribution information provided in the TA was considered appropriate.

#### Impact on the Highway

##### Transport Assessment

The applicant has not provided any junction assessment for consideration, as the proposed changes are likely to have a negligible impact on the operation of the local highway network, this is considered appropriate. Deductions reached as part of the original application submission are considered applicable for the revised scheme and should be carried over, including proposed mitigation measures on the local highway.

Road Safety Personal Injury Collision (PIC) data has been submitted within the TA for the permitted scheme for the five year period 1 April 2010 to 31 March 2015 for the A414 Two Waters Road and the A4251 London Road in the area of the application site. However, no updated collision data has been provided in the Transport Letter. It is considered that additional assessment of the most recent collision should be provided to demonstrate that there are no new trends for collisions along the network.

## Highway Layout

### Site Access

As part of the Transport Letter, no additional details have been provided for the access arrangements; however, the applicant has stated that details from the TA and subsequent addendums should be considered. Therefore, the following information from the previous submission is still considered applicable for the proposed application.

The vehicle and pedestrian access is proposed to be taken from Whiteleaf Road. The site access will be designed to achieve visibility splays of 2.4m x 43m.

The vehicle access will serve as the access to the Automatic Parking System (APS). There is an existing barrier from Whiteleaf Road to the vehicle access but this barrier does not appear to be retained in the proposed site plans. The vehicle access will be a vehicle crossover and a zebra crossing for pedestrians has been provided on the site plans. As part of the first TA Addendum, swept path assessments for the electric car parking stations were provided. HCC has reviewed these and they are deemed suitable.

### Visibility Splays

As previously stated, the site access will be designed to achieve visibility splays of 2.4m x 43m which is consistent with the requirements set out in the Manual for Streets for a 30mph road speed.

### Servicing Arrangements

As part of the Transport Letter, no additional details have been provided for the servicing arrangements; however, the applicant has stated that details from the TA and subsequent addendums should be considered. Therefore, the following information from the previous submission is still considered applicable for the proposed application.

The TA states that the footprint of the site is not of sufficient size to accommodate appropriate turning manoeuvres within its boundary for servicing and delivery vehicles. The TA states that the worst case scenario for servicing and delivery vehicles is that they will service the site by either backing into the site access from Whiteleaf Road or back onto Whiteleaf Road from the site access, which is the current practice of the site. However, this manoeuvre will be required more frequently with the proposed development and the LPA should assess the feasibility of this option with the waste contractor. Furthermore, to facilitate this manoeuvre the development will provide 4.0m of headroom which the TA states is sufficient to accommodate a refuse vehicle. The TA states that the manoeuvre required into and out of the site access by servicing and delivery vehicles is a low risk manoeuvre as traffic flow on Whiteleaf Road is low. However, it has not been demonstrated that this conclusion is suitable as the traffic into and out of the development will be significantly higher than the previous use and may conflict with this manoeuvring.

The TA identifies a second option which requires acquiring an existing lay-by, which has the function of a turning head, between the development site and Arriva to the south for use by servicing and delivery vehicles. The applicant has stated they would expand and adapt the lay-by to make it suitable for use by the servicing and delivery vehicles. More detail about

how the property will be accessed via the lay-by is required. As was acknowledged in the TA, S106 contributions and S278 agreement will be required for alterations and expansion of the lay-by. However, as this serves as a turning head and is the last opportunity on public highway 'Whiteleaf Road' that serves as a turning head, discussions are required to determine the feasibility of this option. Furthermore, the location of the lay-by exceeds the requirement that servicing arrangements for refuse collection are to be located within 30m from the refuse storage area.

Further information and clarification regarding servicing and delivery arrangements are required to support that servicing and deliveries can be undertaken safely and will not impact on the highway. It is considered that this can be conditioned as part of future planning permissions.

### Road Safety Audit

A Stage 1 Road Safety Audit will not be required for the development site access as the site access will remain unchanged. However, if the lay-by is acquired for use by the development for servicing and delivery vehicles, as prescribed in the permitted application submission, a Stage 1 Road Safety Audit will be required for the lay-by expansion and operation.

### Parking

The development proposal has specified that 323 car parking spaces would be provided for the development, 5 of which will be electric car stations on the ground level. Dacorum Borough Council's residential parking standards were used in the TA and are summarized as follows for residential use C3:

- Studio: 1.25 spaces maximum for vehicles
- 1 bedroom: 1.25 spaces maximum for vehicles
- 2 bedroom: 1.5 spaces maximum for vehicles
- 3 bedroom: 2.25 spaces maximum for vehicles

Given the specified requirements outlined above, the standards lead to a maximum of 413 car parking spaces. The application site is located in a Zone 4 Accessibility Zone and therefore a reduction to 75% - 100% of maximum permitted parking provision applies. 75% of the maximum permitted parking provision equates to a total of 310 parking spaces. The 323 proposed spaces falls within the Zone 4 accessibility zone specifications for the residential portion of the development.

The applicant has provided proposed parking provisions and requirements for the proposed development using the Dacorum Borough Council's parking standards. However, it will be up to Dacorum Borough Council to comment on the acceptability of the number of spaces. The applicant has provided support to confirm that the parking system will operate effectively and safely to avoid parking displacement onto the highway network for the permitted scheme of 272 dwellings. An approach was agreed with HCC to establish a suitable APS processing time considering the type of users and the anticipated time it will take each group to exit and enter their vehicles.

The second TA Addendum utilised the methodology suggested by HCC to establish an 87s cycle time. This is deemed suitable by HCC.

The TA predicts the queuing utilising two methods:

- 1) Average Demand Profile; and,
- 2) Normal Distribution Profile.

The average demand profile calculations demonstrate that the queuing will not queue back to Whiteleaf Road and therefore this method would demonstrate that the site can

accommodate peak hour trip demands. Due to the existing congestion in the area during peak hours, monitoring will be required for the revised scheme to ensure that the additional dwellings do not result in additional queuing that would impact the highway network.

### Disabled Parking

Where communal parking is proposed for over 20 units, 6% of the total number of spaces should be provided for exclusive disabled use plus 1 space of sufficient dimensions to be used by disabled persons for every 10 units. This should be provided over and above the general parking requirements. However, the proposed development will have an Automatic Parking System which does not require the provision of disabled spaces as the bays where car drivers and passengers leave the vehicle are sufficient to accommodate the needs of individuals requiring the use of disabled car parking spaces.

### Cycle Parking

Dacorum Borough Council's residential cycle parking standards were used in the TA and are summarized as follows for residential use C3:

- Minimum 1 space per residential unit for cycle parking

The standard therefore requires a minimum 323 cycle spaces. The Transport Letter did not state how many cycle parking spaces will be provided. It will be up to Dacorum Borough Council to comment on the acceptability of the number of spaces.

### Accessibility

The proposed site is not considered to be entirely sustainable or accessible to alternative modes of transport. Consequently, staff and residents are likely to be heavily reliant on private vehicles to access the site.

### Public Transport

The nearest bus stops to the development site are on A414 Two Waters Road, and is over 250m walking distance away from the site. Bus routes and frequencies serving these stops are set out below. Both have shelters, neither have easy access kerbing.

- Service No. 500/501: Aylesbury - Hemel Hempstead - Watford (4 per hour)
- Service No. H19: Abbots Langley - Hemel Hempstead (1 per day - Tuesdays and Thursday only)
- Service No. NHS1: Hemel Hempstead - Watford (2/3 per day)

The Transport Assessment mentions the 207 which does not stop at these stops and is only a very limited service and the NHS1 which no longer runs.

The nearest national rail station is Hemel Hempstead Station located approximately 1 km or 15 minute walk from the development site. The station is on the main line between London Euston and Birmingham New Street stations.

### Walking and Cycling

Both A414 Two Waters Road and A4215 London Road have continuous footways on both sides, and the signalised junction of these two roads provides for all pedestrian movements with refuges.

There are no specific provisions for cyclists in the form of cycle lanes or advanced cycle stop lines on either the A414 Two Waters Road or A4215 London Road. There are no National Cycle Network routes or other off road routes in the vicinity of the application site.

If developer contributions are being sought from this site, these should be used towards measures to encourage the use of sustainable modes of transport to make walking, cycling and bus use more attractive. In relation to bus accessibility, neither of the nearest bus stops have easy access kerbing or departure screens. Easy access kerbing costs approx. £8000 per stop, departure screens also £8000 (including maintenance) so a contribution of £32,000

would be appropriate. We would also support measures to improve pedestrian and cycle facilities in the vicinity of the site.

#### Travel Plan

A Framework Travel Plan (FTP) has been provided as part of the TA for the permitted scheme, as an updated FTP was not provided, the comments on the original submission are still applicable for this application. The FTP does not contain any targets. The targets should be based on achieving a suitable mode split as suggested as part of the trip generation analysis.

A Full Travel Plan, in accordance with HCC's Travel Plan Guidance will be required and secured via a S106 Agreement. The Full Travel Plan should include the measures outlined in the FTP to encourage sustainable travel and promote the travel plan. Funding for these measures should be secured via a S106 Agreement. Following details should be considered and incorporated:

- Appropriate objectives are required for the FTP and the applicant should focus in particular on reducing single occupancy vehicle trips.
- The applicant will need to confirm support by securing budget.
- The applicant will need to confirm the full time travel plan coordinator and who they will be employed by.
- Baseline travel conditions will need to be confirmed and these would presumably be estimated pre-occupation through Census and similar data. Following part occupation, initial travel monitoring could be undertaken. This would need to include multi-modal counts conforming to Trics SAM methodology, as well as behavioral questionnaires.
- Mode share targets provided in the TP should be 'SMART'.
- Monitoring should be undertaken annually for at least five years following full occupation, and reported to HCC.
- A more comprehensive site travel plan with thorough implementation and monitoring plan will need to be developed in order to discharge planning permission condition.

#### Construction

The Transport Letter and original TA and Design and Access Statement submissions did not contain specific information regarding the potential impacts on the highway network during the construction of the proposed development. However, a 'Draft Construction Method Statement' was provided that highlights the various phases of construction. The 'Draft Construction Method Statement' does not contain the information required as part of a Construction Logistics Plan (CLP). The permitted scheme TA does acknowledge the need for a CLP and will provide one with the following major items:

- Programme to determine different major stages of construction such as site establishment, excavation of basements, etc.
- Quantification of daily construction vehicle trip generation for each phase.
- Identification of construction traffic routes and any temporary traffic management measures and pedestrian provisions that may be required.
- Construction site layout to include: site offices and welfare facilities, stores, wheel washing, hard standing areas, etc.
- Off-site vehicle waiting, call off, marshalling and security.

Given the significant scale of proposals and small location of the development, the applicant should prepare a CLP detailing how the potential construction impacts on pedestrians and vehicles will be managed and should be secured via a Section 106 agreement.

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

Dacorum Borough Council has a community infrastructure levy and contributions towards local transport scheme will be sought via CIL and/or S106 contributions, if appropriate.

#### Conclusion

HCC recommend granting permission of the planning application subject to suitable conditions.

### **CRIME PREVENTION OFFICER**

Thank you for sight of planning application 4/02368/17/MOA, demolition of a 4 storey residential development. Featuring 305 apartments, on-site gym and leisure facilities, on site coffee shop, roof garden and library /observatory, internal arboretum, function room and underground parking facilities for 323 cars in an automatic car parking system, with onsite electric car share. The Beacon, Whiteleaf Road, Hemel Hempstead, HP3 9PH.

I would ask that the development is built to the police preferred minimum security standard of secured by design, achieving the Secured by Design award meets the requirements of Approved Document Q (ADQ),

### **Car Parking**

In relation to previous work undertaken , I do have concerns regarding the automatic car parking system . I have contacted the British Parking Association who inform me that there are very few of these systems in England , there are two in London however they are not open on a 24hr basis and are manned by a concierge whilst open. I have also liaised with our Traffic Management.

There is also the cube in Birmingham , please find the observations made by my professor Mike Clare listed below:

The location for the car parking system is;

The Cube,

196 Wharfside Street,

Birmingham

B1 1RN

Email [info@thecube.co.uk](mailto:info@thecube.co.uk)

Telephone 0121 654 9400

It has its own website, which can be viewed at;

<http://www.thecube.co.uk/> where, in a section entitled 'The Car Park', there is a video explaining how the system works.

You can go straight to the video by following the below link;

<http://www.thecube.co.uk/the-car-park>

On a practical note I have a few observations;

There are only four boxes installed which take the vehicles and place them into the parking spaces.

There are approximately 150 spaces (CCTV controller not sure at the time of the visit).

The system is not overly quick at the number of transactions per hour that each parking box can handle, but with 4 x such boxes it is thought they may be able to handle somewhere up to 50 transactions per hour? Although this is a guesstimate

Although improved now, any failings in the system, or individual boxes, does result in a much slower service and a rise in the number of complaints.

It should be noted though that this site is very much in the centre of Birmingham and therefore the residents are part of the 'city living' section of the community that would probably need their cars less.

It is a secure system, in that there has been no crime since the site opened. Safety measures, which deactivate the automated system if the presence of a human is identified, do provide a raised level of protection against intrusion by either offender or rough sleeper (a problem in the area).

Due to the length of time some repairs took (due to the waiting time for the delivery of spare / replacement parts) some parts for the system are stored on site. I am informed that technicians are normally on site within an hour, which suggests possible a local company is involved.

It is also not cheap, I understand that the cost per space is £120 per month.

There is a very sensible policy regarding queuing to use the system, with clear designated areas to rank, including a loading / unloading layby attached to the building.

There are, obviously a number of CCTV cameras allowing staff to monitor the operation of the system and the entrances to the site.

In summary, a secure system though not overly quick in allowing cars to disgorge from the site.

This is obviously a contentious issue as car storage/ parking is a growing problem and there is a need to embrace new technology however my Concerns regarding Crime prevention and security are :

- There are 323 car parking spaces and 2 retrieval robots , this would take approximately 2 hours to retrieve all the cars , this would be fine for a car dealership , however for residential use where most people leave for school and work at about the same time , where would they queue? this could cause conflict.

- I have concerns around the car lift area , no barriers or access control ?
- Would the car lift give people enough time to load / unload their cars ,? a person on their own will be far quicker getting out of a car than a family with pushchairs and shopping.
- What happens if the machine mal functions ? where would the cars go that area already has a huge congestion problem at peak times?
- Is there 'in and out' access to and from the lift?

### **Other Considerations**

- You may find people parking on the roads as they don't want to use or pay for the car park.
- Changing infrastructure, for example electric cars ?

### **STRATEGIC PLANNING**

The site is located in the Two Waters General Employment Area (GEA) – see saved Local Plan Policy 31. The table in Policy 31 states that proposed employment uses in this GEA are business, industry, storage and distribution.

The Site Allocations Development Plan Document (July 2017) reduced the size of the Two Waters GEA, but the Beacon site is still within the GEA (see page 38 in the Written Statement and page 46 in the Map Book).

There have been a number of planning applications on this site since 2014, culminating in the approval of 4/03441/15/MFA for 272 flats. As a result, the principle of residential development on the site has been established, so there is no case to refuse the current planning application on Local Plan Policy 31 grounds.

305 flats are proposed in the current application, 33 more than with 4/03441/15. Also, the number of storeys proposed in the Beacon has increased from 16 to 17. However, it is relevant to note that:

- The current application proposes more studios and 1 and 2 bedroom flats than 4/03441/15 and no 3 bedroom flats (unlike 4.03441/15 which proposed 26). These changes mean that the total number of bedrooms proposed has fallen by six.

- The height of the proposed development is 0.5 metres lower than with 4/03441/15, because the void between each floor has been reduced.

323 parking spaces are proposed, 10 more than with 4/03441/15. We have no objection to the proposed parking provision, particularly given the change in the dwelling mix referred to in bullet 1 above. In addition, we welcome the proposed electric car share scheme and electric bike share scheme, which will help to reduce parking demand. We also welcome the proposal for the building to be highly sustainable.

**Conclusion:** we have no policy objections to this application.

### **ENVIRONMENT AGENCY**

Thank you for consulting us on this application. We have reviewed the submitted information and have no objection to the proposal.

The applicant is looking to install deep boreholes for the heating system. It is important that these are installed in a way which protects the underlying groundwater.

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 additional 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: Principles and practice' document (commonly referred to as 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.

End 2

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

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):

Groundwater Protection: Principles and Practice (August 2013)

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 [planningguidance.planningportal.gov.uk](http://planningguidance.planningportal.gov.uk):

Land affected by contamination

British Standards when investigating potentially contaminated sites and groundwater:

- BS 5930: 1999 A2:2010 Code of practice for site investigations
- BS 10175:2011 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

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.

Should you have any queries please contact me.

## **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.

## **HERTS PROPERTY SERVICES**

Herts Property Services do not have any comments to make in relation to financial contributions required by the Toolkit, as this development is situated within Dacorum's CIL Zone 3 and does not fall within any of the CIL Reg123 exclusions. Notwithstanding this, we reserve the right to seek Community Infrastructure Levy contributions towards the provision of infrastructure as outlined in your R123 List through the appropriate channels.

## **THAMES WATER**

### Waste Comments

Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.

Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging

groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing [wwriskmanagement@thameswater.co.uk](mailto:wwriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality)."

Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.

#### Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

### **LEAD LOCAL FLOOD AUTHORITY**

Thank you for consulting us on the above application for the demolition of a 4 storey office building. Construction of 16 storey residential development featuring 305 apartments, onsite gym and leisure facilities, onsite coffee shop, roof garden and library/observatory, internal arboretum, function room and underground parking facilities for 323 cars in an automated car parking system, with onsite electric car share.

We acknowledge that this proposal is an addendum to the approved scheme 4/03441/15/MFA for the demolition and replacement of a 4 Storey Office Building. The drainage strategy is based upon attenuation and discharge into Thames surface water sewer at 5l/s. We acknowledge that rainwater harvesting will be provided within the drainage system to assist in reducing surface water run-off. We note that 105m<sup>3</sup> attenuation volume needs to be provided for the 1:100 plus climate change event. The 105m<sup>3</sup> includes the total attenuation require plus extra for the rainwater harvesting which will be provided with four tanks, one to be located on the roof and the other three on cvels -1, -2 and -3 of the basement car park. Surface water would discharge to the Thames Water from the lowest basement tank only when the rainwater harvesting volume is exceeded. Thames water have been contacted and confirmation has been provided that they are satisfied in principle to the proposed connection.

We understand that it is intended to continue to investigate and quantify further initiatives to reduce surface water run-off. Where the operation of these tanks would aim to maximise the use of this water providing not only water to flush toilets but use water to create hydro-electric power using the 16 storey drop to operate turbines.

We therefore recommend the following conditions to the LPA should planning permission be granted.

the proposed development will only meet the requirements of the National Planning Policy Framework if the measures detailed in the surface water drainage assessment carried out by EnviroCentre referenced 467264 dated August 2017 and drainage design carried out by Thomasons reference G21001 dated March 2016 submitted with this application are implemented and secured by way of a planning condition on any planning permission.

**Condition 1**

1. Limiting the surface water run-off to 5l/s with discharge into the Thames Water Sewer.
2. Providing a minimum of 105m<sup>3</sup> attenuation volume (or such storage volume agreed with the LLFA) to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + climate change event.
3. Undertake drainage strategy to include to the use attenuation tanks, green roofs and rainwater harvesting.

**Reason**

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

**Condition 2** No development shall take place until the final design of the drainage scheme is completed and sent to the LPA for approval. The scheme shall also include; The scheme shall also include:

1. Detailed engineered drawings of the proposed SuDS features and discharge control devices including their, location, size, volume, depth and any inlet and outlet features.
2. Detailed surface water calculations and modelling for all rainfall events up to and including the 1 in 100 year + 40% climate change event supported by a clearly labelled drainage layout plan showing pipe networks. This 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.

**Reason**

To prevent the increased risk of flooding, both on and off site.

**Condition 3**

Upon completion of the drainage works an updated management and maintenance plan for the all the SuDS features and structure must be submitted and shall include arrangements for adoption and any other arrangements to secure the operation of the scheme throughout its lifetime.

To prevent the increased risk of flooding.

**Informative to the LPA**

The proposed drainage scheme relies on the use of pumps. The use of pumps to drain the site will significantly increase the future maintenance burden and therefore increase the risk of failure due to poor maintenance. Details of the maintenance of the pump should be provided along with an emergency plan showing how the site would respond if the pump failed. The LPA will need to be satisfied that the proposed drainage strategy will be maintained and managed for the lifetime of the development.

Please note if the LPA decide to grant planning we wished to be notified for our records.

**CANAL AND RIVER TRUST**

The Canal & River Trust is a statutory consultee under the Town and Country Planning (Development Management Procedure) (England) Order 2015. The current notified area applicable to consultations with us, in our capacity as a Statutory Consultee was issued to Local Planning Authorities in 2011 under the organisations former name, British Waterways. The 2011 issue introduced a notified area for household and minor scale development and a notified area for EIA and major scale development.

This application falls outside the notified area for its application scale. We are therefore returning this application to you as there is no requirement for you to consult us in our capacity as a Statutory Consultee.

We are happy to comment on particular applications that fall outside the notified areas if you would like the Canal & River Trust's comments in specific cases, but this would be outside the statutory consultation regime and must be made clear to us in any notification letter you send. The document Development Management and British Waterways, issued to all LPAs with the changes to the notified areas in 2011, highlights some areas where specific cases may occur. This and further information on Planning and the Canal & River Trust can be found at: [www.canalrivertrust.org.uk](http://www.canalrivertrust.org.uk)