

<b>4/01198/18/MFA</b>	<b>DEMOLITION OF EXISTING BUILDING AND CONSTRUCTION OF FOUR RESIDENTIAL BUILDINGS TO PROVIDE 29 FLATS (12 X 1BED, 17 X 2BED), PUBLIC OPEN SPACE, RESIDENTIAL AND VISITOR PARKING AND ASSOCIATED AMENITY SPACE.</b>
<b>Site Address</b>	<b>LAND AT APSLEY MILLS ADJ. THE COTTAGE, LONDON ROAD, APSLEY, HEMEL HEMPSTEAD</b>
<b>Applicant</b>	<b>Dacorum Borough Council, The Forum</b>
<b>Case Officer</b>	<b>Joan Reid</b>
<b>Referral to Committee</b>	<b>The application is referred to the Development Control Committee as Dacorum Borough Council is both the land owner and the applicant.</b>

## 1. Recommendation

1.1 It is recommended that the application is delegated to the Group Manager of Development Management and Planning with a view to **APPROVAL** subject to the completion of an agreement under Section 106 of the Town and Country Planning Act 1990 for;

- 100% social rented accommodation; and
- Submission of amended plans detailing the changes proposed by the Conservation and Design Officer or otherwise scheme to be agreed by the Conservation Officer;
- Submission and approval of Hertfordshire County Council of swept path assessments to demonstrate that servicing and emergency vehicles can safely enter and manoeuvre within the site. Imposition of recommended conditions as advised by Hertfordshire County Council; and imposition of the conditions listed.

## 2. Summary

2.1 The application is recommended for approval. The principle of development is considered acceptable on the site in accordance with Site Allocation TWA7 both in terms of use for affordable homes and density. The site is located within Flood zones 1, 2 and 3 and the proposal is identified as being more vulnerable in the NPPF. As such the Environment Agency have not objected to the scheme on the basis of flooding and are satisfied that the scheme achieves sufficient spacing/buffer zone surrounding the River Gade. The scheme offers a suitable density of affordable housing which is supported and addresses the constraints on the site through careful design. There are satisfactory distances between buildings to maintain sufficient privacy and spacing. The design of the development is such that it relates well to the surrounding character and is not harmful to the adjacent Grade II listed building. The scheme provides sufficient parking at a ratio of 1 space per unit which is considered acceptable for the tenure of the units and the location of the site near to a local centre, train station and bus routes

## 3. Site Description

3.1 The application site comprises a long strip of land extending from the London Road, Apsley to the canal, adjacent to Home Base and the Apsley Paper Mill Pub. The site lies adjacent to a Grade II listed building and previously was a key site originally forming part of the John Dickinson printing works. The site has laid vacant for some time since the redevelopment for the adjacent land for housing and has recently been cleared. The site is located within Flood Risk Zones 1, 2 and 3 and two culverts lie horizontally across the site which have been filled in. The surrounding area comprises a range of mixed uses including recent residential buildings, retail and employment uses.

## 4. Proposal

4.1 The application seeks full planning permission for 29 one and two bedroom residential units all to be affordable units (social rented). The development comprises four separate blocks; two three storey buildings fronting onto the London Road (Buildings A) and the middle building (Buildings B) and canal side building (Building C) comprise a 4 storey warehouse style buildings. The development is to be served with an access off an existing vehicular access from the London Road. 31 car parking spaces (including disabled spaces) are provided to serve the development along with communal amenity space, cycle and bin storage. This is an amended scheme following approval in 2015 which has changed in order to overcome issues relating to deculverting of the site. The main revisions are removal of two units, building C is closer to the canal and building B in the middle is half width and no longer requires the undercroft.

The scheme forms part of the Council's New Homes programme which seeks to deliver affordable homes in sustainable locations.

## 5. Relevant Planning History

4/03344/15/MFA DEMOLITION OF DISUSED OFFICE BUILDING AND CONSTRUCTION OF FOUR BUILDINGS WITH 31 FLATS IN TOTAL, PUBLIC OPEN SPACE, RESIDENTIAL AND VISITOR CAR PARKING AND ASSOCIATED AMENITY SPACE  
Granted  
26/04/2016

4/03042/15/MO A OUTLINE APPLICATION OF A RESIDENTIAL SCHEME OF UP TO 50 ONE BEDROOM FLATS WITH PARKING (REVISED SCHEME)  
Granted  
23/12/2015

4/03584/14/MO A OUTLINE APPLICATION FOR THE CONSTRUCTION OF 50 ONE BEDROOM FLATS WITH CAR PARKING AND VEHICULAR ACCESS.  
Refused  
10/06/2015

## 6. Policies

### 6.1 National Policy Guidance

National Planning Policy Framework (NPPF)  
National Planning Policy Guidance (NPPG)

### 6.2 Adopted Core Strategy –

Policies CS1, CS2, CS3, CS4, CS8, CS9, CS10, CS11, CS12, CS14, CS17, CS19, CS27, CS28, CS29, CS30, CS31, CS35

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

Policies 10, 13, 21, 31, 33, 58, 106, 111, 119, 129  
Appendices 3, 5 and 6

### 6.4 Supplementary Planning Guidance

## **7. Constraints**

- Former Land Use
- GENERAL EMPLOYMENT AREA
- TWO WATERS AREA

## **8. Representations**

### Consultation responses

8.1 These are reproduced in full at Appendix 1

### Neighbour notification/site notice responses

8.2 These are reproduced in full at Appendix 1

## **9. Considerations**

### Main issues

9.1 The main issues to consider are:

- Policy and principle
- Design and Impact to listed building
- Quality of Accommodation
- Flooding and Deculverting

### Policy and Principle

#### 9.2 Land Use

The site falls within a general employment area as covered by saved Policy 31 of the local plan, but also within the specific proposal site TWA7. Policy 31 seeks to prevent the loss of employment floorspace within GEAs. Under site allocation TWA7, the wider site was identified for visitor centre and related development for a mix of uses creating local employment. It continues that the mix of uses could include offices, hotel, restaurant with a small number of residential units. A Masterplan was also produced (September 1999) which stated that there should be a "limited" amount of residential on the site.

Spatial planning, in its consultation response, has indicated that some elements of the policy have moved on since its allocation by Policy 31 and TWA7. The site has now been formally identified as a housing allocation (Proposal H/10) in the Pre-Submission Site Allocations DPD (September 2014). The site is seen as delivering between 25-35 units and the planning requirements refer to:

“High density housing acceptable. Access from London Road. Careful design and landscaping required to ensure a satisfactory relationship with adjoining commercial uses. Flood risk assessment required.”

It should be noted that the principle of redeveloping the site with up to 50 one bed flats was approved by the Council (Ref 4/03042/15/MOA) and more recently, a full planning permission

was granted for 31 units.

Given the above, the broad principle of delivering affordable housing through a proposal on this site is now supported and is broadly in line with the original densities envisaged.

#### Layout, Design, Scale, etc.

9.3 The proposed density for 29 units is considered acceptable and in line with the Site Allocations DDP. This is a lower density than that previously approved on the site and this scheme comprises a mix of one and two bedroom units which is considered a good mix of housing for the area than that approved in the outline scheme. The layout has broadly been set from the constraints on the site including the location of culverts and is similar to the approved scheme, however is now considered to allow for better circulation within the site. The layout allows good circulation throughout the site and makes good use of the levels as you move from the London Road towards the canal. The scheme represents a good quality development affording sufficient parking provision and residential amenities, whilst overcoming a very constrained redundant site to provide affordable housing units.

The buildings comprise the following mix:

Buildings A - 4 x one bedroom and 2 x two bedroom units

Building B - 5 x one bedroom and 7 x two bedroom units

Building C - 3 x one bedroom units and 8 two bedroom units

#### Design and Impact to Historic Assets

9.4 The site lies adjacent to a Grade II listed building and as such specific consideration is given to how the development impacts on its setting. The scheme proposes four distinct blocks, those fronting the London Road and two warehouse style buildings further within the site. In part, the style, bulk and form of the development is largely similar to that already granted planning permission however offers better design and spacing within the development due to the lower density proposed. The London Road frontage is formed by two book end buildings. These have been designed having regard to more simple buildings evident in the area and are of a scale, height and distance from the Listed building which conserves its character. Whilst the buildings appear to be somewhat disjointed, it is not considered that they would appear out of the context with the streetscene and are of a size and form more domestic in scale to the listed building adjacent. The conservation and design officer has raised no objection to the scheme and considers that the current proposals would be acceptable and in keeping with the general character of the redeveloped site, drawing on features of 18<sup>th</sup> and 19<sup>th</sup> century mill developments whilst ensuring that the structures can be read as dating from the 21<sup>st</sup> century. However, the Conservation Officer has requested that some minor changes be made to help improved the overall design. In terms of the buildings A (fronting London Road), the Conservation Officer considers that improvements could be made if these buildings could be lifted by having more of a feature such as a larger recess to the structure or having a glazed box section. Also features within the gables are recommended. Similarly, in terms of buildings B and C, the Conservation officer has requested more detail in terms of the entrance feature and stair tower and other minor alterations to these buildings.

The Canal and River Trust have raised no objection to the scheme and consider that retention of the wall nearest the canal is supported. They consider that the gable wall of Block C could be improved by further detailing which is also requested by the Conservation and design officer.

Overall, the scheme is considered to be a well-designed proposal making the best use of a very constrained and restricted site, which has regard and respects the setting of the listed building. Subject to the changes suggested, it is considered that the proposal is acceptable.

### Impact on Trees and Landscaping

9.5 No objection is raised with regard to any important trees or landscaping. Should permission be granted, a condition would be imposed requiring full details of landscaping proposals.

### Impact on Highway Safety and Parking

9.6 Provision is made for 30 car parking spaces. The provision of 31 car parking spaces serving 29 units equates to a ratio of just over 1:1 spaces. Appendix 5 of the local plan sets out a maximum car parking standard of 1.25 spaces for a one bedroom unit and 1.5 spaces for a two bedroom unit. As such the amount of car parking proposed is considered slightly under the maximums set out in appendix 5 of the local plan (setting a maximum of 40 spaces). Having regard to the location of the site, close to the train station, together with the proposal comprising small affordable units, it is considered that 1 space per unit would be an acceptable and appropriate provision of parking. A similar provision ratio was recently accepted for the more dense development of 50 units on the site and indeed the scheme for 31 units.

Although it is acknowledged that there are wider concerns over parking provision within the immediate area, taking account of the above and the lack of any adopted minimum parking guidelines it is considered that the LPA would not be able to substantiate an argument for refusal based on inadequate parking provision.

Access is proposed via the existing vehicular access from London Road and through the middle building from an undercroft arrangement. Hertfordshire Highways have been consulted and are largely satisfied with the proposals although it is noted that they seek some further details of swept path assessments before they agree the scheme. The proposals will also involve off site works which will be subject to a S278 agreement.

### Affordable Housing

9.7 Policy CS19 of the adopted Core Strategy states that affordable homes will be provided: on sites of a minimum size 0.3ha or 10 dwellings (and larger) in Hemel Hempstead. 35% of the new dwellings should be affordable homes. Higher levels may be sought on sites which are specified by the Council in a development plan document, provided development would be viable and need is evident.

A minimum of 75% of the affordable housing units provided should be for rent. Judgements about the level, mix and tenure of affordable homes will have regard to: (a) the Council's Housing Strategy, identified housing need and other relevant evidence (see Policy CS18); (b) the potential to enlarge the site; (c) the overall viability of the scheme and any abnormal costs; and (d) arrangements to ensure that the benefit of all affordable housing units passes from the initial occupiers of the property to successive occupiers.

The scheme proposes 100% affordable housing provision and as such the Council is supportive of this approach. If permission were to be granted, a suitably worded S106 will need to be entered into to ensure delivery of the level, and tenure of the affordable housing provision.

### 9.8 Flooding and Deculverting of the Site

The previous scheme requested that the developer deculvert the section of river nearest the canal, however over time, it is now apparent that this is not feasible and as such this scheme proposes to retain the culvert in its existing state but offers to repair. The Environment Agency have been heavily involved with the site for a number of years and have had extensive

discussions over the revised proposals and are now satisfied with the scheme. The layout has been designed to leave free both culverts that cut across the site in order to allow for repairs/changes and for structural reasons. The Lead Local Flood Authority has also considered the scheme and have no objection in principle on flood risk grounds. The LLFA have advised that the proposed development site can be adequately drained and can mitigate any potential existing surface water flood risk if carried out in accordance with the submitted drainage strategy and has such asked for specific conditions in line with the recommendations of the drainage strategy.

#### Other Material Planning Considerations

9.9 Policy CS12 of the adopted Core Strategy states that "On each site development should: a) provide a safe and satisfactory means of access for all users; b) provide sufficient parking and sufficient space for servicing; c) avoid visual intrusion, loss of sunlight and daylight, loss of privacy and disturbance to the surrounding properties; d) retain important trees or replace them with suitable species if their loss is justified; e) plant trees and shrubs to help assimilate development and softly screen settlement edges; f) integrate with the streetscape character; and g) respect adjoining properties in terms of: i. layout; ii. security; iii. site coverage; iv. scale; v. height; vi. bulk; vii. materials; and viii. landscaping and amenity space".

#### Quality of Accommodation

i) Spacing of Dwellings - There should be sufficient space around residential buildings to avoid a cramped layout and maintain residential character, to ensure privacy and to enable movement around the building for maintenance and other purposes. The minimum distances of 23 m between the main rear wall of a dwelling and the main wall (front or rear) of another should be met to ensure privacy. This distance may be increased depending on character, level and other factors. The layout of the scheme allows for spacing in accordance with 23m minimum distances required between habitable windows. It is noted that a shorter distance exists in part between buildings B and C due to the staggered orientation but where this shorter distance exists it is at an obscure angle or primarily affecting the communal hallway and as such it is considered that sufficient distances exist between habitable windows in order to ensure privacy for future residents.

ii) Noise and Nuisance - An Acoustic Assessment has been commissioned which considers the noise climate at the site and that noise mitigation will be required due to the road traffic noise as well as the potential impacts from the adjacent delivery yard. The report finds that external noise levels to communal garden and balconies have been found to be in line with building regulation standards. The environmental health officer has considered the scheme acceptable in principle and requested specific measures as outlined in the supporting documents to be secured by condition.

iii) Air Quality - The site is located within 0.6miles of two of the Council's AQMA. The environmental health officer has requested that an Air quality report be submitted by condition which has regard to the guidance and Act . The report should indicate areas where there are, or likely to be, breaches of an air quality objective. If there are predicted exceedances in exposure to levels above the Air Quality Objectives, then a proposal for possible mitigation measures should be included.

iv) Small areas of private amenity is provided within the site. Due to the constrained nature of the site, it is difficult to provide larger areas of amenity space however the surrounding area provides good levels of public open space within a short distance. No objection is raised on this basis.

#### Impact on surrounding properties/Infrastructure

The site abuts the boundary with Home Base and its service yard and consideration is therefore given to ensuring that the proposal for residential units in close proximity to an existing retail use would not give rise to an unsatisfactory relationship. The plans show that no habitable windows would face onto the yard and a noise survey has been submitted. In principle, the scheme has demonstrated that the orientation and layout of the development can achieve satisfactory relationship to the adjacent noisy uses. Environmental Health has raised no objection in principle however have requested a specific condition seeking measures to demonstrate how the development can achieve adequate noise insulation.

The windows of the proposed development would be located sufficient distance across the other side of the canal to ensure privacy is maintained to properties along Mulready Walk. The properties along Mulready Walk are in excess of 23m away and indeed the frontages are currently within open view to the canal and the pub, wherein it is not considered that the development would result in significant loss of privacy over and above the existing situation. In terms of noise, again, it is not considered that issues would arise in terms of noise to other residential properties considering the existing relationship between dwellings and public space, together with the intervening distances between the proposal and existing residential units. Due to the location of the site adjacent to Homebase, the car park to the pub and the Enterprise building, the proposals wouldn't result in visual intrusion to residential properties or indeed light.

Network Rail have responded to the application and requested that if vibro-compaction machinery / piling machinery or piling and ground treatment works are to be undertaken as part of the development, details of the use of such machinery and a method statement must be submitted to the Network Rail Asset Protection Engineer for agreement.

#### Secure by Design

A number of objectives have been set out by the secure by design officer of which most of these will be covered by building regulations however it is considered good practice and in accordance with the NPPF to include a condition requiring how the development will integrate methods to reduce crime.

#### Refuse

The scheme provides for onsite refuse storage which is considered to be adequate and meets the requirements set out in guidance. No specific comments have been received by the refuse team however.

#### Ecology and Habitats

The application is accompanied by an Ecological report which concludes that there are no ecological implications as a result of the proposal. The ecology officer had no other evidence to suggest otherwise and the site has now been cleared. Herts and Middlesex Wildlife Trust have commented on the application and requested that integrated bat and bird boxes be installed in order to provide a net gain in biodiversity. A condition shall be imposed requesting details of such boxes.

#### S106 and CIL

The application is for 29 affordable housing units and as such this will need to be secured through a S106 agreement. The scheme is for 100% affordable housing units and as such would not be CIL liable. It is noted that the Canal and River Trust have sought clarification whether CIL monies could be sought for towpath improvements, however it is not possible for affordable housing schemes.

## Response to Neighbour comments

9.10 Four neighbours wrote to raise objection over density and parking. These points have been addressed in the report.

### **10. Conclusions**

10.1 The scheme accords with the principles set out policies CS1, CS2, CS3, CS4, CS8, CS9, CS10, CS11, CS12, CS14, CS17, CS19, CS27, CS28, CS29, CS30, CS31, CS35 subject to minor amendments.

**11. RECOMMENDATION** – It is recommended that the application is delegated to the Group Manager of Development Management and Planning with a view to **APPROVAL** subject to the completion of an agreement under Section 106 of the Town and Country Planning Act 1990 for;

- 100% social rented accommodation; and
- Submission of amended plans detailing the changes proposed by the Conservation and Design Officer or otherwise scheme to be agreed by the Conservation Officer;
- Submission and approval of Hertfordshire County Council of swept path assessments to demonstrate that servicing and emergency vehicles can safely enter and manoeuvre within the site. Imposition of recommended conditions as advised by Hertfordshire County Council; and imposition of the conditions below:
- Amendment of approved plan condition to reflect changes.

#### Conditions

No	Condition
1	<p>The development hereby permitted shall be begun before the expiration of three years from the date of this permission.</p> <p>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.</p>
2	<p>No development shall take place until details of the materials and finishes to be used in the construction of the external surfaces of the development together with details of the windows and exterior doors hereby permitted shall have been submitted to and approved in writing by the local planning authority. Development shall be carried out in accordance with the approved details.</p> <p>Reason: To ensure a satisfactory appearance to the development in accordance with policy CS12 of the adopted Core Strategy</p>
3	<p>Prior to the commencement of development, details of landscaping shall be submitted for the approval to the local planning authority and shall include:</p> <p>hard surfacing materials; means of enclosure; soft landscape works which shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate; external lighting; minor artefacts and structures (e.g. furniture, storage units, signs etc.); arrangements for the long term management and maintenance of the on-site open</p>



	<p>spaces including de-culverted areas; programme of implementation bin storage details maintenance and management of Suds</p> <p>The trees, shrubs and grass shall subsequently be maintained for a period of five years from the date of planting and any which die or are destroyed during this period shall be replaced during the next planting season and maintained until satisfactorily established.</p> <p>Reason: To ensure adequate management and provision of services to serve the development and to ensure that it integrates well within the wider character of the area and the canal in accordance with policy 12 of the adopted Core Strategy.</p>
4	<p>No development, shall take place until a Phase I Report to assess the actual or potential contamination at the site has been 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.</p> <p>For the purposes of this condition:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Reason: To ensure that the issue of contamination is adequately addressed and to ensure a satisfactory development, in accordance with Core Strategy (2013) Policy CS32.</p>
5	<p>All remediation or protection measures identified in the Remediation Statement referred to in Condition 4 above 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.</p> <p>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.</p>

	<p>Reason: To ensure that the issue of contamination is adequately addressed and to ensure a satisfactory development, in accordance with Core Strategy (2013) Policy CS32 and the NPPF (2012).</p>
6	<p>No development shall take place 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.</p> <p>Therefore, the construction of the development shall only be carried out in accordance with the approved Construction Management Plan which shall include details of:</p> <ul style="list-style-type: none"> <li>a) Construction vehicle numbers, type, routing</li> <li>b) Traffic management requirements</li> <li>c) Construction and storage compounds (including areas designated for car parking)</li> <li>d) Siting and details of wheel washing facilities</li> <li>e) Cleaning of site entrances, site tracks and the adjacent public highway</li> <li>f) Timing of construction activities to avoid school pick up/drop off times</li> <li>g) Provision of sufficient on-site parking prior to commencement of construction activities</li> <li>h) Post construction restoration/reinstatement of the working areas and temporary access to the public highway.</li> <li>i) Construction or Demolition Hours of Operation</li> <li>j) Dust and Noise control measure</li> <li>k) Asbestos control measure where applicable</li> </ul> <p>Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way, in accordance with Core Strategy (2013) Policy CS8</p>
7	<p>Prior to development, an air quality report assessing the impacts of the proposed development shall be submitted to the Local Planning Authority having regard to the Environment Act 1995, Air Quality Regulations and subsequent guidance.</p> <p>The report should indicate areas where there are, or likely to be, breaches of an air quality objective. If there are predicted exceedances in exposure to levels above the Air Quality Objectives then a proposal for possible mitigation measures should be included.</p> <p>The source of energy among others such as impact of the construction vehicles and machinery to the proposed development must be considered in the air quality assessment report to be submitted. The post construction impact of the development to the existing development will also need to be considered in the report to be submitted. The development shall be implemented in accordance with the agreed report and mitigation strategy.</p> <p>Reason: To ensure the amenities of the neighbouring premises are protected from increased air quality arising from the development; in accordance with Policies CS8 and CS32 of the Core Strategy (2013).</p>
8	<p>The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment and Drainage Strategy carried out by Waterco reference W10602-180420-FRA dated April 2018. The surface water drainage scheme should include;</p> <p>Providing attenuation to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + climate change event.</p> <p>2. Limiting the surface water run-off to 5l/s generated by the 1 in 100 year + climate change critical storm so that it will not exceed the run-off from the undeveloped site and not increase the risk of flooding off-site.</p>

	<p>3. Implementing the appropriate drainage strategy based on attenuation and discharge into the Grand Union Canal via an existing 900mm culvert and provide appropriate storage within permeable paving.</p> <p>Reason: In order to provide for adequate on site drainage in accordance with policy CS32.</p>
9	<p>No development shall take place until the final design of the drainage scheme has been submitted to, and approved in writing by, the local planning authority. The surface water drainage system will be based on the submitted Flood Risk Assessment and Drainage Strategy carried out by Waterco reference W10602-180420-FRA dated April 2018. The scheme shall also include:</p> <ol style="list-style-type: none"> <li>1. Full detailed engineering drawings including cross and long sections, location, size, volume, depth and any inlet and outlet features. This should be supported by a clearly labelled drainage layout plan showing pipe networks. The plan should show any pipe 'node numbers' that have been referred to in network calculations and it should also show invert and cover levels of manholes.</li> <li>2. Demonstrate an appropriate SuDS management and treatment train and inclusion of above ground features reducing the requirement for any underground storage.</li> <li>3. Silt traps for protection for any residual tanked elements.</li> <li>4. Details regarding any areas of informal flooding (events those exceeding 1 in 30 year rainfall event), this should be shown on a plan with estimated extents and depths.</li> <li>5. Details of final exceedance routes, including those for an event which exceeds to 1:100 + cc rainfall event</li> </ol> <p>Reason :To prevent the increased risk of flooding, both on and off site.</p>
10	<p>Details of the proposed boundary treatment adjacent to the canal (showing any repairs needed to the existing wall, and /or the height, specification and materials of a replacement and/or planting) shall be submitted to and agreed in writing by Local Planning Authority and thereafter implemented in accordance with the agreed details unless otherwise agreed in writing.</p> <p>Reason: To ensure that the external appearance of the development is satisfactory in accordance with policy CS11 and CS12.</p>
11	<p>If surface/ground water run-off is proposed to drain into the waterway or to a soak away, full details shall be submitted to and agreed in writing by the Local Planning Authority prior to the commencement of development and thereafter implemented in accordance with the agreed details unless otherwise agreed in writing.</p> <p>Reason: To comply with paragraph 120 of the National Planning Policy Framework and given the proposed use there is the potential for pollution of the waterway and the Canal &amp; River Trust will need reassurance that only clean surface water run-off will be allowed to discharge into the waterway, and, if necessary, that interceptors and other measures will be included to prevent pollution</p>
12	<p>Prior to the commencement of development details of the proposed lighting for the development shall be submitted to and approved in writing by the Local Planning Authority and thereafter implemented in accordance with the agreed details unless otherwise agreed in writing.</p> <p>Reason: To comply with paragraph 125 of the National planning policy Framework as lighting at waterside developments should be designed to minimise the problems of glare, show consideration for bats and unnecessary light pollution should be avoided by ensuring that the level of luminance is appropriate for the location, is sustainable and efficient, and protect</p>

13	<p>Prior to the commencement of development, a plan detailing the model and location of 10 integrated bat boxes and 10 integrated bird boxes (swift) must be supplied to the LPA. These features must be installed before occupation and retained thereafter.</p> <p>Reason: To improve the ecological value of the site in accordance with policy CS27.</p>
14	<p>The development hereby permitted shall be carried out in accordance with the following approved plans/documents:</p> <p>L4077/106C  L4077/108D  L4077/101A  L4077/110D  L4077/102C  L4077/100A  L4077/107D  L4077/112D  L4077/111D  L4077/109D  L4077/103C  L4077/104D</p> <p>Reason: For the avoidance of doubt and in the interests of proper planning.</p> <p>Informatives</p> <p>Affinity Water</p> <p>You should be aware that the proposed development site is located close to or within an Environment Agency defined groundwater Source Protection Zone (GPZ) corresponding to Hunton Bridge Pumping Station. This is a public water supply, comprising a number of Chalk abstraction boreholes, operated by Affinity Water Ltd.</p> <p>The construction works and operation of the proposed development site should be done in accordance with the relevant British Standards and Best Management Practices, thereby significantly reducing the groundwater pollution risk. It should be noted that the construction works may exacerbate any existing pollution. If any pollution is found at the sites then the appropriate monitoring and remediation methods will need to be undertaken.</p> <p>For further information we refer you to CIRIA Publication C532 "Control of water pollution from construction - guidance for consultants and contractors".</p> <p>Environment Agency  Environmental Permit Flood defence consents transferred into the Environmental Permitting Regulations (EPR) on 6 April 2016. You may need an environmental permit for flood risk activities if you want to do work:  ? in, under, over or near a main river (including where the river is in a culvert)  ? on or near a flood defence on a main river  ? in the flood plain of a main river</p> <p>You're breaking the law if you carry out these activities without a permit if you should have one. For further details of environmental permits for flood risk activities please see <a href="https://www.gov.uk/guidance/flood-risk-activities-environmental-permits">https://www.gov.uk/guidance/flood-risk-activities-environmental-permits</a></p>

	<p>Ecology</p> <p>No removal of trees or shrubs that may be used by breeding birds shall take place between 1st March and 31st August inclusive, unless an ecologist has undertaken a check of vegetation for active birds' nests prior to clearance and provided written confirmation to the LPA that no birds will be harmed</p> <p>Canal and River Trust</p> <p>'The applicant/developer is advised to contact Osi Ivowi on 01908 301 591 in order to ensure that any necessary consents are obtained and that the works comply with the Canal &amp; River Trust 'Code of Practice for Works affecting the Canal &amp; River Trust'. In addition, in order for the Canal &amp; River Trust to effectively monitor our role as a statutory consultee, please send me a copy of the decision notice and the requirements of any planning obligation.</p> <p>Water</p> <p>You should be aware that the proposed development site is located close to or within an Environment Agency defined groundwater Source Protection Zone (GPZ) corresponding to Hunton Bridge Pumping Station. This is a public water supply, comprising a number of Chalk abstraction boreholes, operated by Affinity Water Ltd.</p> <p>The construction works and operation of the proposed development site should be done in accordance with the relevant British Standards and Best Management Practices, thereby significantly reducing the groundwater pollution risk. It should be noted that the construction works may exacerbate any existing pollution. If any pollution is found at the sites then the appropriate monitoring and remediation methods will need to be undertaken.</p> <p>For further information we refer you to CIRIA Publication C532 "Control of water pollution from construction - guidance for consultants and contractors".</p>
--	--

## Appendix 1

### Consultation responses

Hertfordshire Highways	<p>Decision</p> <p>Hertfordshire County Council as Highway Authority wish to request additional information to demonstrate that the proposed access arrangements would be safe and suitable for the purposes of the development. Swept path assessments are required to demonstrate that servicing and emergency vehicles can safely enter the site in a forward gear and manoeuvre within to depart in a forward gear. The applicant should also remove the kerb radii from the drawings as these may change as part of the detailed design stage linked to the Section 278 Agreement stage.</p> <p>Description of the Proposal</p> <p>The proposals are for a residential development consisting of 29 flats, all of which will be 'affordable' housing units. The proposed flats would comprise 12 x one-bedroom units and 17 x two-bedroom units. Vehicle access to the site would be gained from the A4251 London Road.</p> <p>Site Description</p> <p>The proposed development site currently consists of a vacant plot of land</p>
---------------------------	---

owned by Dacorum Borough Council (DBC). The site has historically been accessed from London Road and from Stationers Place. The London Road access has been reinstated to a footway with kerbing. The Stationers Place access is through an adjacent car park.

The site is bordered by Apsley Grand Union Canal to the north, The Paper Mill pub and Hemel Hempstead Community Church to the east, the A4251 and a Mercedes-Benz car dealership to the south and Apsley Mills Retail Park to the west. Hemel Hempstead town centre is located approximately 2km to the north, and Apsley Railway Station is located approximately 100m to the south of the site. The A4251 London Road is a Principal A Main Distributor Road with a speed limit of 30mph.

#### Analysis

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

The applicant has submitted a Transport Assessment (TA) for review as part of the application submission, this exceeds the requirements set out in Roads in Hertfordshire: Highway Design Guide (3rd Edition) guidance.

#### Policy Review

The applicant has provided evidence of consideration of the following policy documents in their submission:

- National Planning Policy Framework (NPPF);
- Hertfordshire County Council's (HCC) 'Local Transport Plan 3 2011- 2031' (LTP3);
- Dacorum Borough Council Core Strategy (September 2013);
- Dacorum Borough Council Local Plan 1991-2011.

HCC typically also requires evidence of the following relevant policy documents:

- Planning Practice Guidance (PPG);
- Hertfordshire County Council's Roads in Hertfordshire Highway Design Guide 3rd edition;
- The Hertsmere Local Plan (2012-2027).

However, due to the scale of the development, this is considered acceptable.

#### Trip Generation

The applicant has utilised the TRICS online database (version 7.4.4) to obtain trip rates to establish a trip generation profile for the proposed development.

The trip rates have been determined by considering multi-modal trip surveys and the following parameters were utilised for the interrogation of TRICS:

- Land use - Residential;
- Sub-category - Affordable/Local Authority Flats;
- Sites within England, excluding Greater London;
- Excluding sites over 100 units; and,
- Excluding town centre and edge of town centre locations.

The TRICS trip rates and associated trip generation profile were summarised in the TA. The AM peak hour was identified as 0800-0900 and the PM peak hour was identified as 1600-1700. The following trip rates and associated trip generation, based on 29 units, were provided in the TA:

- AM Peak: 0.100 arrivals, 0.110 departures  
: 3 arrivals, 3 departures for a total of 6 two-way trips
- PM Peak: 0.165 arrivals, 0.110 departures  
: 5 arrivals, 3 departures for a total of 8 two-way trips

HCC has carried out an independent assessment of the TRICS database (version 7.5.1) to confirm the suitability of the above trip rates and associated trip generation. It is considered that the trip generation forecast is acceptable. An analysis of multi-modal trip generation was also included in the TA, and

was provided by considering the multi-modal trip rates resulting from the above TRICS interrogation. The multi-modal trip generation profile is considered acceptable. It is considered that the increase in multi-modal trips can be accommodated on the existing highways and public transport infrastructure.

#### Impact on the Highway Network

According to the trip generation profile, the proposed development is expected to generate 6 two-way vehicular trips in the AM peak and 8 two-way vehicular trips in the PM peak. The NPPF Guidance on Transport Assessments states that proposed developments with less than 30 two-way trips per hour can be considered insignificant and would not have a severe impact on the local highway network.

Despite this, the client has carried out capacity assessments at the proposed site access from the A4251 London Road and at the nearby London Road/Stationers Place junction. The assessment for the proposed site access junction was undertaken using Junctions9 and the assessment for the London Road/Stationers Place junction was undertaken using LinSig.

The Junctions9 results demonstrate that the site access/London Road junction will operate comfortably within capacity during each of the peak hour periods. The LinSig results demonstrate that the existing junction layout will accommodate the future year traffic flows generated by the proposed development. Therefore, mitigation measures at the junctions would not be required.

HCC concludes that the approach taken towards assessing the impact on the highway network is acceptable and is satisfied that the proposed development would not have a severe impact on the local highway network.

#### Highway Safety

Personal Injury Collision (PIC) data has been assessed as part of the submitted TA. It is stated that there are no significant clusters of accidents reported and that the development proposals are not expected to have a severe impact on the safety of the local highway network.

HCC has carried out an independent review of the PIC data using the crash map online resource. One serious incident was reported at the proposed site access junction, the incident occurred on 14/08/2015 and involved three vehicles with one casualty. No fatal incidents have been reported near the site within the last five years. There are no obvious clusters of serious incidents that would suggest an underlying issue with the safety of the highway network. Therefore, HCC considers that the proposed development is not likely to exacerbate any existing collision trends on the local highway network.

#### Highway Layout

##### Vehicle Access

As part of the development, it is proposed that the former access from London Road be reopened. As a result of the access being reopened, the existing lay-by located adjacent to the site frontage would be removed.

The proposed access road would be 4.8m wide with 1.8m wide footways on both sides. A pedestrian crossing is proposed at the site access for pedestrians utilising the footway north of the A4251 London Road. The pedestrian crossing will include dropped kerbs and tactile paving. A second pedestrian crossing is proposed west of the site for pedestrians crossing the A4251 London Road, this crossing will also be equipped with dropped kerbs and tactile paving.

It is also proposed that a right turn lane is provided by removing four of the existing hatch markings in the centre of the highway. A visibility splay of 4.5m x 66m is demonstrated from the proposed site access.

The following comments require consideration as part of any future

application submission:

- The applicant should remove the kerb radii dimensions from the proposed access drawing as these may require amendment as part of the detailed design stage linked to the S278 Agreement stage.
- 1.8m wide footway is not considered acceptable at this location and the applicant should consider a footway width of 2m
- Clear footway connection with exiting footway networks is required (as shown on drawing 14365-001)
- Proposed pedestrian crossing and central refuge island should have minimum 2m width
- Buff coloured tactile paving should be 3x3 full rows
- Carriageway Lane Width should be 3.65m and right turn lane width should be 3.5m
- Retaining structure -details of retaining structure should be provided (purpose, size and will not limit the visibility)
- Visibility splay of 4.5m x 66m would be acceptable
- Swept Path analysis for a refuse vehicle (12.1m long) is required as part of any future submission

#### Pedestrian Access

The pedestrian access point is the same as the vehicle access point. Pedestrian access to the site will be provided directly from London Road through the creation of 1.8m wide footways on both sides of the site access road. Note above that the applicant should consider provision of 2m wide footways.

#### Road Safety Audit

The applicant has submitted a Stage 1 Road Safety Audit, along with a Designer's Response and evidence of HCC's review of the documents. HCC were satisfied with the Designer's Response to the issues raised in the Road Safety Audit and required provision of an updated drawing to reflect the changes.

#### Delivery, Servicing and Refuse Vehicles

The submitted TA states that all service vehicles will access the site via the access from London Road. The internal site layout will be designed in accordance with the 'Manual for Streets' to ensure that service and emergency vehicles will be able to safely access, manoeuvre within, and egress from, the proposed development.

HCC notes that the applicant should have provided swept path assessments demonstrating that service vehicles and emergency vehicles are able to access, manoeuvre within, and egress from the proposed development in a forward gear.

#### Swept Path Assessments

Swept path assessments have not been provided and are required to demonstrate that service vehicles and emergency vehicles can safely access/egress the site.

#### Parking

The development proposals include a car parking provision of 31 spaces, inclusive of 6 disabled spaces and 2 visitor spaces located in a communal car parking area.

HCC has carried out an assessment of DBC Local Plan Parking Standards.

The standards state that the site is located within Accessibility Zone 3; therefore, the following maximum standards are applicable:

- 1.25 spaces per 1 bed unit; and,
- 1.5 spaces per 2 bed unit.

Based on the above, the maximum number of car parking spaces is 40 (1.25 x 14 + 1.5 x 15). Therefore, the proposed number of 31 spaces is considered acceptable by HCC as it is 75% of the maximum provision. However, it is



ultimately the decision of the LPA to determine the suitability of car parking.

#### Cycle Parking Provision

Secure, covered cycle storage will be provided for 27 bicycles, and private lock ups are to be provided for 2 bicycles. The DBC Local Plan Parking Standards state that one cycle parking space should be provided per unit; therefore, the proposed 29 spaces is in keeping with the standards.

HCC considers that the proposed cycle parking provision is acceptable for the proposed development. However, it is ultimately the decision of the LPA to determine the suitability of cycle parking.

#### Accessibility

##### Public Transport

The closest bus stops to the site are located on the A4251 London Road. The westbound stop is approximately 70m east of the site access and the eastbound stop is approximately 130m east of the site access. Both stops consist of a flagpole, timetable and easy access kerbing. These stops provide access to the following services:

- 500 - Aylesbury to Watford (4 per hour);
- H19 - Kings Langley Station to Hemel Hempstead (1 per day - Tues & Thurs only).

HCC notes that the site is well served by the 500 service which provide access throughout Hemel Hempstead and the neighbouring residential areas, as well as to Aylesbury and Watford. The bus stops located on the A4251 London Road are less than a minute walk from the site, making buses a viable method of travel for potential future residents of the development. Apsley Station is located approximately 100m south of the site and can be accessed via the A4251 London Road. The journey is less than a minute walk.

The station is managed by London Northwestern Railway and includes facilities such as toilets, a waiting room and cycle parking. The station provides regular direct services to a variety of popular destinations, including London. There are approximately 2 services per hour to London Euston.

HCC concludes that the development site is in a sustainable location. There are good opportunities for future residents to utilise sustainable modes of transport to access the site.

##### Walking and Cycling

The local area has a relatively flat gradient which is conducive to both walking and cycling. Hemel Hempstead town centre is located approximately 2km north of the site (29-minute walk or 10-min

cycle) and provides access to local services and facilities such as Hemel Hempstead Hospital and The Marlowes Shopping Centre.

There is footway provision on both sides of the A4251 London Road. There are also dropped kerbs and tactile paving at crossing points in the area. Footway widths in the vicinity of the site appear acceptable and street lighting is provided. Signalised pedestrian crossing facilities are located approximately 70m southeast of the site on the A4251 London Road.

The closest National Cycle Network path is Route 57 which, once complete, will run from west to east from Cricklade in Wiltshire to Welwyn Garden City in Hertfordshire. The route includes a mixture of traffic free sections and quiet roads.

The A4251 London Road is considered suitable for cyclists due to the acceptable road width and surface quality. London Road is also subject to a speed limit of 30mph, which makes on-road cycling more attractive.

HCC concludes that walking and cycling are viable travel options for future residents of the development and that the local area is conducive to both travel methods. The accessibility of the area is deemed suitable for the proposed level of development.

	<p><b>Travel Plan</b> HCC's guidance on Travel Plans states that a Travel Plan Statement is not required for residential developments of less than 50 units. Therefore, no Travel Plan or Travel Plan Statement is required for the proposed development.</p> <p><b>Construction</b> A Construction Traffic Management Plan would be required to ensure construction vehicles would not have a detrimental impact in the vicinity of the site and a condition would be required to provide adequate parking for demolition and construction vehicles on-site to prevent on-street conflict and impacts to the highway safety. A Construction Traffic Management Plan would be required for all phases of the construction, including demolition, excavation and construction of all elements of the development.</p> <p><b>Planning Obligations / Community Infrastructure Levy (CIL)</b> Dacorum Borough Council has adopted the Community Infrastructure Levy (CIL) and therefore contributions towards local transport schemes would be sought via CIL if appropriate.</p> <p>The nearest bus stops are accurately identified in the TA and the frequency of services is acceptable. The stops have a flagpole, timetable and easy access kerbing, but do not have a shelter or live timetable. This money could be used towards the provision of a shelter and/or a live timetable at the bus stops located on the A4251 London Road.</p> <p><b>Summary</b> HCC has reviewed the TS and other relevant documents to assess the impact of the proposals on the local highway network's operation and safety. The trip generation rates were reviewed and are considered appropriate for the proposals. The collision data was reviewed and it was found that there were no clusters of collisions near the site that would likely be exacerbated by the proposed development traffic. However, HCC require further information to support that the access arrangements are safe and suitable</p>
HERTS PROPERTY SERVICES	<p>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.</p>
DBC Conservation	<p>This is a site near the centre of Apsley and has been cleared to leave a brownfield site. The surrounding area has been redeveloped from formal industrial uses to housing and adjacent to the development there is a 2 storey public house. There are also some large retail units. Adjacent is the grade II listed Cottage buildings and within the garden of this U shaped development is the war memorial also grade II listed. To the rear is the canal and a lock. These are located beyond a high wall of the former factory site.</p> <p>The proposal involves redeveloping the site for housing. A number of proposals have been discussed over time and it has been deemed acceptable in principle. Overall we believe that the current proposals would be acceptable and in keeping with the general character of the redeveloped site. This draws on features of 18th and 19th century mill developments whilst ensuring that the structures can be read as dating from the 21st century. However it would be recommended that there are minor changes to the design of the proposal.</p> <p><b>Buildings A</b> The two entrance blocks appear to have been designed to in effect form gate</p>

symmetrical gate lodges to the site entrance. We do not object to the form or layout however it may be useful to consider some minor changes. We are concerned that the symmetrical off set full height features to the sides of the facades of both blocks appears to neither highlight the contemporary nature of the buildings and yet fails to result in an appropriate facsimile. It may be better to consider making more of a feature and either having a larger recess to the structure or perhaps an extension of a glazed box. It would be recommended that the glazing differs from the other windows and removes the glazing bars. It would also be advantageous to have a feature within the gables. This could be undertaken in either brickwork or perhaps another material. It would also be recommended that the eaves details be conditioned to ensure a suitable overhang and shadow line. The traditional windows need to be recessed rather than flush to ensure an appropriate appearance and provide visual interest by creating shadow lines.

#### Building B Central Block

Ideally more detail could be provided for the entrance feature and stair tower. This would be to ensure that the detailing enhances the appearance of the building. It may also be useful to consider having a dental course to the eaves and have a different brick to perhaps the ramped/ plinth element. To help break up the gables it would be advantageous to reinstate the Oculus feature as shown in the previous drawings. This would enhance the overall appearance of the structure. As noted above the traditional windows need to be recessed rather than flush to ensure an appropriate appearance and provide visual interest by creating shadow lines.

#### Building to the canal. (Building C)

When travelling on the canal, tow path or from the bridge there would be views of the new building. Whilst this would not be harmful to the wider context of the canal zone it would be recommended that the some interest be added to the brickwork to ensure that in particular the gables had some visual interest and were not simply 4 storeys plus the gable of flat brickwork. To give the building a firm plinth one could add a robust string course between the ground and first floor above the ground floor window heads. This could be simply of say 2-3 courses of a dark brick. Within the gables one could provide a similar feature to those shown on page 13 of the design and access statement which shows a British Waterways building with panelled brickwork to the gable. This feature has been somewhat copied to the new build block of flats in the central picture. A further addition could be a string course or dental course to the gables to provide visual interest and add to the shadow line. We would recommend that the eaves details either be conditioned or submitted to ensure that there is a sufficient overhang to the facades and that the downpipes and guttering be pressed aluminium. Further detailing could be submitted at this time for the central atrium/ stairwell feature and canopy. The canopy could benefit from being a lighter weight glazed structure perhaps slightly covered to provide a counter point to the strong angular forms of the building. As noted above the traditional windows need to be recessed rather than flush to ensure an appropriate appearance and provide visual interest by creating shadow lines.

#### Landscaping.

We believe that in general the landscaping proposals are acceptable. However it would be useful to contemplate re-ordering the parking to allow a pedestrian/ cycle entrance to the road of the adjacent housing/ pub site. This would improve pedestrian access to the canal route to Hemel/ Kings Langley and allow these groups to avoid the busy main road.

STRATEGIC PLANNING	We do not wish to comment on this application as the principle of development is already firmly established on the site given the extant planning permission for 31 homes. Please refer to policy/standards in the DBLP/Core Strategy/Site Allocations DPD.
LEAD LOCAL FLOOD AUTHORITY	<p>Following a review of the Flood Risk Assessment and Drainage Strategy carried out by Waterco reference W10602-180420-FRA dated April 2018, we can confirm that we the Lead Local Flood Authority (LLFA) have no objection in principle on flood risk grounds and can advise the Local Planning Authority (LPA) that the proposed development site can be adequately drained and can mitigate any potential existing surface water flood risk if carried out in accordance with the submitted drainage strategy.</p> <p>The drainage strategy is based upon based on attenuation and discharge into the Grand Union Canal via an existing 900mm culvert. We acknowledge that the discharge rate will be limited to the 5 l/s and 120m<sup>3</sup> attenuation volume is required to manage runoff for a 1 in 100 year (+40%) event. A total attenuation volume of 120m<sup>3</sup> will be required to achieve the discharge rate and will be provided within the permeable paving sub-grade material. We therefore recommend the following conditions to the LPA should planning permission be granted.</p> <p>LLFA position Condition 1 The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment and Drainage Strategy carried out by Waterco reference W10602-180420-FRA dated April 2018. The surface water drainage scheme should include;</p> <ol style="list-style-type: none"> <li>1. Providing attenuation to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + climate change event.</li> <li>2. Limiting the surface water run-off to 5l/s generated by the 1 in 100 year + climate change critical storm so that it will not exceed the run-off from the undeveloped site and not increase the risk of flooding off-site.</li> <li>3. Implementing the appropriate drainage strategy based on attenuation and discharge into the Grand Union Canal via an existing 900mm culvert and provide appropriate storage within permeable paving.</li> </ol> <p>Condition 2 No development shall take place until the final design of the drainage scheme has been submitted to, and approved in writing by, the local planning authority. The surface water drainage system will be based on the submitted Flood Risk Assessment and Drainage Strategy carried out by Waterco reference W10602-180420-FRA dated April 2018. The scheme shall also include:</p> <ol style="list-style-type: none"> <li>1. Full detailed engineering drawings including cross and long sections, location, size, volume, depth and any inlet and outlet features. This should be supported by a clearly labelled drainage layout plan showing pipe networks. The plan should show any pipe 'node numbers' that have been referred to in network calculations and it should also show invert and cover levels of manholes.</li> <li>2. Demonstrate an appropriate SuDS management and treatment train and inclusion of above ground features reducing the requirement for any underground storage.</li> <li>3. Silt traps for protection for any residual tanked elements.</li> </ol>

	<p>4. Details regarding any areas of informal flooding (events those exceeding 1 in 30 year rainfall event), this should be shown on a plan with estimated extents and depths.</p> <p>5. Details of final exceedance routes, including those for an event which exceeds to 1:100 + cc rainfall event</p> <p>Reason To prevent the increased risk of flooding, both on and off site.</p>
NETWORK RAIL	<p>Network Rail would comment:</p> <p>(1) If vibro-compaction machinery / piling machinery or piling and ground treatment works are to be undertaken as part of the development, details of the use of such machinery and a method statement must be submitted to the Network Rail Asset Protection Engineer for agreement. All works shall only be carried out in accordance with the method statement and the works will be reviewed by Network Rail. The Network Rail Asset Protection Engineer will need to review such works in order to determine the type of soil (e.g. sand, rock) that the works are being carried out upon and also to determine the level of vibration that will occur as a result of the piling. The impact upon the railway is dependent upon the distance from the railway boundary of the piling equipment, the type of soil the development is being constructed upon and the level of vibration. Each proposal is therefore different and thence the need for Network Rail to review the piling details / method statement. Maximum allowable levels of vibration - CFA piling is preferred as this tends to give rise to less vibration. Excessive vibration caused by piling can damage railway structures and cause movement to the railway track as a result of the consolidation of track ballast. The developer must demonstrate that the vibration does not exceed a peak particle velocity of 5mm/s at any structure or with respect to the rail track.</p> <p>(2) Access and egress from the railway station must remain open and unblocked around the clock both during construction and as a permanent arrangement.</p>
EA	<p>We have no objection to the proposals and no conditions to request. Environmental Permit Flood defence consents transferred into the Environmental Permitting Regulations (EPR) on 6 April 2016. You may need an environmental permit for flood risk activities if you want to do work: in, under, over or near a main river (including where the river is in a culvert) on or near a flood defence on a main river in the flood plain of a main river</p> <p>You're breaking the law if you carry out these activities without a permit if you should have one. For further details of environmental permits for flood risk activities please see <a href="https://www.gov.uk/guidance/flood-risk-activities-environmental-permits">https://www.gov.uk/guidance/flood-risk-activities-environmental-permits</a></p>
Thames Water	<p>No Objection</p> <p>Thank you for notification of the above planning application. Planning applications are referred to us where our input on issues relating to water quality or quantity may be required.</p>

	<p>You should be aware that the proposed development site is located close to or within an Environment Agency defined groundwater Source Protection Zone (GPZ) corresponding to Hunton Bridge Pumping Station. This is a public water supply, comprising a number of Chalk abstraction boreholes, operated by Affinity Water Ltd.</p> <p>The construction works and operation of the proposed development site should be done in accordance with the relevant British Standards and Best Management Practices, thereby significantly reducing the groundwater pollution risk. It should be noted that the construction works may exacerbate any existing pollution. If any pollution is found at the sites then the appropriate monitoring and remediation methods will need to be undertaken.</p> <p>For further information we refer you to CIRIA Publication C532 "Control of water pollution from construction - guidance for consultants and contractors".</p>
Affinity Water	<p><b>Waste Comments</b></p> <p>With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services">https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services</a></p> <p>There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes</a>.</p> <p>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.</p> <p>'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 <a href="mailto:wwqriskmanagement@thameswater.co.uk">wwqriskmanagement@thameswater.co.uk</a>. Application forms should be completed on line via <a href="http://www.thameswater.co.uk/wastewaterquality">www.thameswater.co.uk/wastewaterquality</a>."</p>

	<p>The proposed development is located within 15m of our underground waste water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes</a>. Should you require further information please contact Thames Water. Email: <a href="mailto:developer.services@thameswater.co.uk">developer.services@thameswater.co.uk</a> Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB</p> <p>As you are redeveloping a site, there may be public sewers crossing or close to your development. If you discover a sewer, it's important that you minimize the risk of damage. We'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes</a>.</p> <p><b>Water Comments</b>  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.</p>
<p>Canal and River Trust</p>	<p>The Canal &amp; River Trust (the Trust) is the guardian of 2,000 miles of historic waterways across England and Wales. We are among the largest charities in the UK. Our vision is that "living waterways transform places and enrich lives". We are a statutory consultee in the development management process. The Trust has reviewed the application. This is our substantive response under the Town and Country Planning (Development Management Procedure) (England) Order 2015.</p> <p>The main issues relevant to the Trust as statutory consultee on this application are:</p> <ul style="list-style-type: none"> <li>a) Impact on the character and appearance of the waterway corridor.</li> <li>b) Impact on the structural integrity of the canal due to the proximity of the building to the canal.</li> <li>c) Impact on the structural integrity of the canal due to the drainage proposals.</li> <li>d) Accessibility.</li> </ul> <p><b>Character and appearance of the waterway corridor</b></p> <p><b>Design and layout</b>  The proposal is located adjacent to the lock and the drawings show the retention of a boundary wall. It is not clear if the existing wall is to be retained, or a new replacement wall added. The Trust would oppose the removal of the existing wall unless further details prove that it is beyond repair or the erection of a higher wall in this location as not only will this prevent many of the future</p>

occupiers taking advantage of the waterside location but will present an unsatisfactory backdrop to the lock structure. However, the lock landing adjacent to the site should remain inaccessible to occupiers however to prevent the lock gates being used as a shortcut from the site onto the towpath. The Trust do not encourage lock gates crossings to be used by the general public for safety reasons and these are only provided to allow operation of the lock gates by boaters. Block C is closest to the canal, but it is set reasonably far back due to the presence of the culverts. When viewed from the canal corridor from the north the gable elevation appears as very bland and could be improved by the addition of some fenestration to improve the overall appearance of this elevation.

Impact on the structural integrity of the canal due to the proximity of the building to the canal

The applicants should discuss the proposal further with Osi Ivowi, Waterway Engineer with the Trust, on 01908 302 591 to establish whether further information regarding the impact of the proposal on the lock structure is needed.

Impact on the structural integrity of the canal due to the drainage proposals

The proposal indicated that Surface water discharge should be directed into the Grand Union canal via the pipe/culvert which crosses through the site. This will need further discussion with the Canal & River Trust to ensure that the quality and quantity of the proposed drainage are acceptable in this location and any agreement may be subject to a commercial agreement.

#### Accessibility

The site is located adjacent to the Grand Union Canal, with the nearest towpath access point approximately 100 metres away. The canal towpath provides a sustainable transport link between the site and other facilities within the town as well as proving a quiet and safe off-road walking and cycling route for recreational purposes. The towpath is a recognised Sustrans cycle route.

The value of the towpath in improving the connectivity and accessibility in the area has been recognised by Dacorum Council. The Canal & River Trust support the Hemel Hempstead Urban Transport Plan which has identified the need for wide ranging improvements such as improved signage and seating, and improvements particularly for cyclists such as widening the towpath and providing access points at certain locations. The nearest access point to the towpath is close to the site where an iconic bridge provides access onto the towpath to the east of the site.

The Trust feels that the provision of housing on this site will result the possible increased usage of the canal towpath as a sustainable transport route.

Without suitable mitigation measures this could result in increased degradation of the towpath surface, not just in the immediate location of the site but also elsewhere in Hemel Hempstead. General canal towpath improvements such as widening and resurfacing, are needed to cope with additional usage and to ensure that the Councils aspirations for improving cycling throughout the town are met.

The Trust can provide numerous examples of similar situations where developers have made accessibility improvements as a form of mitigation to



offset additional usage of the towpath to reach a site, or to link from a site to other facilities as a sustainable, traffic-free green transport route.

With reference to the approach to developer contributions contained in the Community Infrastructure Levy Regulations 2010 (CIL), we consider that a case can be made that a contribution is both necessary and directly related to the proposed development. The nature of the works to be covered by the contribution is improvements to allow safer, more sustainable access to the site for the additional users likely to be attracted by the proposal, and therefore we believe it is appropriate in kind.

We understand that there are particular circumstances relating to this application and therefore it may not be appropriate to request that the proposal makes a contribution towards the upgrading of the Grand Union Canal Towpath as it runs through Hemel Hempstead. We would request that the Case Officer confirms whether there is support for such a request in this instance.

If the council are minded to grant permission we would request that the following conditions and informative are imposed.

#### Conditions

1. Details of the proposed boundary treatment adjacent to the canal (showing any repairs needed to the existing wall, and /or the height, specification and materials of a replacement and/or planting) shall be submitted to and agreed in writing by Local Planning Authority and thereafter implemented in accordance with the agreed details unless otherwise agreed in writing.

Reason: To ensure that the external appearance of the development is satisfactory. The boundaries adjacent waterside developments should provide an attractive façade and poor design can affect how the waterway is perceived. The construction of foundations for walling or fencing has the potential to impact on the integrity of the waterway therefore development approved should prevent damage to the waterway structure and protect users on the towpath.

2. If surface/ground water run-off is proposed to drain into the waterway or to a soakaway, full details shall be submitted to and agreed in writing by the Local Planning Authority prior to the commencement of development and thereafter implemented in accordance with the agreed details unless otherwise agreed in writing.

Reason: To comply with paragraph 120 of the National Planning Policy Framework and given the proposed use there is the potential for pollution of the waterway and the Canal & River Trust will need reassurance that only clean surface water run-off will be allowed to discharge into the waterway, and, if necessary, that interceptors and other measures will be included to prevent pollution.

3. prior to the commencement of development details of the proposed lighting for the development shall be submitted to and approved in writing by the Local Planning Authority and thereafter implemented in accordance with the agreed details unless otherwise agreed in writing.

Reason: To comply with paragraph 125 of the National planning policy Framework as lighting at waterside developments should be designed to minimise the problems of glare, show consideration for bats and unnecessary light pollution should be avoided by ensuring that the level of luminance is appropriate for the location, is sustainable and efficient, and protect

Informative

	<p>If the Council is minded to grant planning permission, it is requested that the following informative is attached to the decision notice:          “The applicant/developer is advised to contact Osi Ivowi on 01908 301 591 in order to ensure that any necessary consents are obtained and that the works comply with the Canal &amp; River Trust “Code of Practice for Works affecting the Canal &amp; River Trust”.</p> <p>In addition, in order for the Canal &amp; River Trust to effectively monitor our role as a statutory consultee, please send me a copy of the decision notice and the requirements of any planning obligation.</p>
<p>Herts and Middlesex WildlifeTrust</p>	<p>In accordance with the ecological report, integrated bat and bird boxes should be installed in order to deliver a net gain to biodiversity, in accordance with NPPF. Integrated boxes are incorporated into the brickwork. A condition should also be applied to ensure that nesting birds are protected during development, as directed by the ecological report. The following conditions (adapted from BS 42020) should be added to the decision:</p> <p>'Prior to the commencement of development, a plan detailing the model and location of 10 integrated bat boxes and 10 integrated bird boxes (swift) must be supplied to the LPA. These features must be installed before occupation and retained thereafter.'</p> <p>'No removal of trees or shrubs that may be used by breeding birds shall take place between 1st March and 31st August inclusive, unless an ecologist has undertaken a check of vegetation for active birds' nests prior to clearance and provided written confirmation to the LPA that no birds will be harmed.'</p>
<p>Environmental Health</p>	<p>Please be advise that we have no objection to the proposed development in relation to Noise, Air Quality and land contamination.</p> <p>However, with the proposed development located on an historic and former contaminated land use i.e. factory or unspecified works site of medium risk, former paper mill, within a very close proximity of a railway station of medium risk as well as in an affected area for Radon where 1.3% of homes are above the action level, the following planning conditions and informative are recommend should planning permission be granted.</p> <p>1a). Contaminated Land Condition          No development, shall take place until a Phase I Report to assess the actual or potential contamination at the site has been 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.</p> <p>For the purposes of this condition:</p> <p>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.</p>

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, in accordance with Core Strategy (2013) Policy CS32.

1b). All remediation or protection measures identified in the Remediation Statement referred to in Condition 1a above 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, in accordance with Core Strategy (2013) Policy CS32 and the NPPF (2012).

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](http://www.dacorum.gov.uk)

2). Construction Management Plan Condition

No development shall take place 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.

Therefore, the construction of the development shall only be carried out in accordance with the approved Construction Management Plan which 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
- e) Cleaning of site entrances, site tracks and the adjacent public highway
- f) Timing of construction activities to avoid school pick up/drop off times
- g) Provision of sufficient on-site parking prior to commencement of construction activities

- h) Post construction restoration/reinstatement of the working areas and temporary access to the public highway.
- i) Construction or Demolition Hours of Operation
- j) Dust and Noise control measure
- k) Asbestos control measure where applicable

Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way, in accordance with Core Strategy (2013) Policy CS8.

### 3). Air Quality Assessment condition

With the proposed development within 0.6 miles of two of the council AQMA and couple of our passive monitoring locations of which the previous and current NO<sub>2</sub> concentration is exceeding the AQ objective with the size of the proposed development and number of car parking spaces, An air quality report assessing the impacts of the proposed development will need to be submitted to the Local Planning Authority having regard to the Environment Act 1995, Air Quality Regulations and subsequent guidance.

The report should indicate areas where there are, or likely to be, breaches of an air quality objective. If there are predicted exceedances in exposure to levels above the Air Quality Objectives then a proposal for possible mitigation measures should be included.

The source of energy among others such as impact of the construction vehicles and machinery to the proposed development must be consider in the air quality assessment report to be submitted. The post construction impact of the development to the existing development will also need to be consider in the report to be submitted.

Reason: To ensure the amenities of the neighbouring premises are protected from increased air quality arising from the development; in accordance with Policies CS8 and CS32 of the Core Strategy (2013).

### 4). Energy Source Condition

With the applicant failing to reference the site energy source in any of the submitted supportive information; should the development have CHP or biomass, the CHP and or biomass boilers must not exceed the Band B Emission Standards for Solid Biomass Boilers and CHP Plant as listed in Appendix 7 of the London Plan's Sustainable Design and Construction SPG document. Prior to the development commencing, evidence to demonstrate compliance with these emission limits will be submitted to the Local Planning Authority for approval.

b. Prior to installation, details of the boilers shall be forwarded to the Local Planning Authority for approval. The boilers shall have dry NO<sub>x</sub> emissions not exceeding 40 mg/kWh (0%).

c. The CHP must have a discharge stack which is at least 3m above any openable windows or ventilation air inlets within a distance of 5Um. Details to demonstrate compliance with this condition must be submitted to the local authority for approval prior to works commencing.

Reason: To ensure the amenities of the neighbouring premises are protected from increased air quality arising from the development; in accordance with Policies CS8 and CS32 of the Core Strategy (2013).

	<p>5a). Noise Assessment Condition  Before any of the residential units hereby permitted are occupied, noise control measures shall be carried out in accordance with the applicant submission in Sections 6.3, 6.6 and 6.9 of the submitted Acoustic Assessment of Noise Report prepared by Ned Johnson Acoustic Consultants Limited with the believes that the raw monitoring data which has now been requested to be submitted by the consultant; having not reference this in his report, is in line with the submitted background noise and overall noise measurement in the report.</p> <p>Any amendment to these proposals shall be submitted to the Local Planning Authority for prior approval in writing.</p> <p>5b). Noise mitigation measures should produce internal and external noise levels specified in table 4 section 7.7.2 of BS8233 (2014) and reiterated in Sections 3.16 (Internal Noise Level) and 3.14 (Area of External Amenity) of the submitted noise report.  The mechanical ventilation system where applicable as submitted in section 6.6 of the report shall meet or exceed the specifications set out in clause 6, schedule 1 of the Noise Insulation Regulations 1975 with regard to acoustic performance and airflow rates.  Alternative schemes that meet the above noise and ventilation standards can be considered. The approved scheme is to be completed prior to the occupation of the development and shall be permanently maintained thereafter. The developer shall certify to the local planning authority that the noise mitigation measures agreed have been installed.</p> <p>Reason: In the interests of future residents. To ensure that adequate precautions are implemented to avoid noise nuisance, in accordance with Policies and procedures of Dacorum Borough Council</p> <p>6). Demolition Method Statement  Prior to demolition works commencing a Demolition Method Statement shall be submitted to and approved in writing by the Local Planning Authority for a management scheme whose purpose shall be to control and minimise emissions of pollutants from and attributable to the demolition of the development. This should include a risk assessment and a method statement in accordance with the control of dust and emissions from construction and demolition Best Practice Guidance published by London Councils and the Greater London Authority. The scheme shall set out the secure measures, which can, and will, be put in place.</p> <p>Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way, in accordance with Core Strategy (2013) Policy CS8.</p> <p>7). Un-expected Contaminated Land Informative  In the event that contamination is found at any time when carrying out the approved development that was not previously identified, it must be reported in writing immediately to the Local Planning Authority with all works temporarily suspended because, the safe development and secure occupancy of the site lies with the developer.</p>
Housing Team	Strategic Housing comments are as follows in response to the proposal below:

	<p>To meet the affordable housing policy requirements 35% of the dwellings should be agreed for affordable housing.</p> <p>Therefore, 11 units should be provided for affordable housing. We would specify that the tenure mix of the affordable housing provision is 75% affordable rented and 25% shared ownership in line with our Affordable housing SPD.</p>
<p>Herts Minerals and Waste Team</p>	<p>Should the council be mindful of permitting this application, a number of detailed matters should be given careful consideration.</p> <p>Government policy seeks to ensure that all planning authorities take responsibility for waste management. This is reflected in the county council's adopted waste planning documents. In particular, the waste planning documents seek to promote the sustainable management of waste in the county and encourage districts and boroughs to have regard to the potential for minimising waste generated by development.</p> <p>Most recently, the Department for Communities and Local Government published its National Planning Policy for Waste (October 2014) which sets out the following:</p> <p>'When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> the likely impact of proposed, non- waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities;</li> <li><input type="checkbox"/> new, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service;</li> <li><input type="checkbox"/> the handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities, and minimises off-site disposal.' <p>This includes encouraging re-use of unavoidable waste where possible and the use of recycled materials where appropriate to the construction. In particular, you are referred to the following policies of the adopted Hertfordshire County Council Waste Core Strategy and Development Management Policies Development Plan Document 2012 which forms part of the Development Plan. The policies that relate to this proposal are set out below:</p> <p>Policy 1: Strategy for the Provision for Waste Management Facilities. This is in regards to the penultimate paragraph of the policy;</p> <p>Policy 2: Waste Prevention and Reduction: &amp;</p> <p>Policy 12: Sustainable Design, Construction and Demolition.</p> <p>In determining the planning application, the council is urged to pay due regard to these policies and ensure their objectives are met.</p> <p>The county council would expect detailed information to be provided separately for the demolition, site preparation and construction phases of development The waste arisings will be of a different composition from each of these phases. Good practice templates for producing SWMPs can be found at:</p> </li></ul>

	<p><a href="http://www.smartwaste.co.uk/">http://www.smartwaste.co.uk/</a> or  <a href="http://www.wrap.org.uk/construction/tools_and_guidance/site_waste_management_planning/index.html">http://www.wrap.org.uk/construction/tools_and_guidance/site_waste_management_planning/index.html</a></p> <p>The SWMP should be set out as early as possible so that decisions can be made relating to the management of waste arisings and so that building materials made from recycled and secondary sources can be used within the development. This will help in terms of estimating what types of containers/skips are required for the stages of the project and when segregation would be best implemented. It will also help in determining the costs of removing waste for a project.</p> <p>The county council as Waste Planning Authority would be happy to assess any SWMP that is submitted and provide comments to the two councils</p>
<p>Crime Prevention Officer</p>	<p>My comments are made from a crime prevention perspective only, however taking into consideration the crime figures for the area and previous comments relating to this application.</p> <p>Car Parking Area</p> <p>Previous comments have been made regarding the layout and the area becoming a crime hot spot, I can see that the car park area will be a brick surface to identify the boundary into the site. However I would ask that some form of access control is included as parking is a problem in that area and conflict could occur with inappropriate parking.</p> <p>I am content with the surveillance, I would ask that the car park area is well lit however no bollard lighting used as this is not fit for purpose it will increase the fear of crime and is easily damaged intentionally or unintentionally.</p> <p>Secured by Design</p> <p>Achieving the Police minimum security standard for this development would mitigate the majority of my concerns regarding this development and would meet the requirements of building regulations approved document Q, this would involve:</p> <p>Physical Security (SBD)</p> <p>Communal door sets:  Certificated to BS PAS 24: 2016, or LPS.1175 (SR2)</p> <p>Access Control to block of flats:  Audio Visual. Access control Tradespersons release buttons are not permitted.</p> <p>Postal delivery for communal dwellings (flats):  Communal postal boxes within the communal entrances, covered by the CCTV or each flat will have post delivered to it via a letter plate fitted in each flat's door., with the local Posta Officer being given an access fob.</p> <p>Individual front entrance doors of flats  Certificated to BS PAS 24:2016</p> <p>Windows: Flats  Ground floor windows and those easily accessible certificated to BS Pas 24:2016 or LPS 1175 French doors for balconies:</p> <p>Dwelling security lighting (flats):  Communal entrance hall, lobby, landings, corridors and stairwells, and all entrance/exit points..</p> <p>Bin stores /Cycle Stores :  The access doors to these should be to LPS.1175, or BS PAS 24: 2016.</p>

## Appendix 2

### Neighbour notification/site notice responses

#### Objections

Address	Comments
21 CROWN WALK,HEMEL HEMPSTEAD,,,HP3 9WS	Parking on Stationers PI is already leading people to park down the middle of the road causing a hazard. 29 flats plus visitors will undoubtedly lead to more cars than spaces (31 total and 2 visitor spaces is nowhere near enough) so I object on the basis that parking will be completely insufficient and there is a significant risk emergency vehicles will not be able to turn around due to inconsiderate parking as well as parking spilling onto the main road and/or parking spilling onto the Belswains Lane side of the canal which is already struggling. In addition, I am concerned about a significant reduction in light due to the size of the building and the significant shadowing it will cause. Lastly, what auditing is in place to ensure that an application from DBC, which is assessed by DBC planners, is assessed in a truly independent fashion please?
10 MILLBANK,HEMEL HEMPSTEAD,,,HP3 9RN	No more properties in this area please it is a nightmare getting anywhere through I around Apsley. Infrastructure does not support any more residential building
1 ORCHARD STREET,HEMEL HEMPSTEAD,,,HP3 9DT	Apsley cannot take any more developments. The infrastructure is not in place. Stop ruining this area for everyone that lives in it already. The roads are jammed; the parking is awful. It can't support more buildings/people/cars. Why not improve the area for the current residents instead.
6 KENTS AVENUE,HEMEL HEMPSTEAD,,,HP3 9SW	This will cause more traffic and parking issues in Apsley which is already horrendous so I object to this happening!