

<b>4/00958/18/MFA</b>	<b>HYBRID PLANNING APPLICATION FOR 226 DWELLINGS, CEMETERY CAR PARK WITH TOILET BLOCK AND PUBLIC OPEN SPACE (DETAILS SUBMITTED IN FULL). AND 0.75 HECTARES OF EMPLOYMENT SPACE (B1a, b and c) AND A CEMETERY EXTENSION OF 1.7 HECTARES WITH ALL MATTERS RESERVED (SUBMITTED IN OUTLINE)</b>
<b>Site Address</b>	<b>LA5, LAND AT ICKNIELD WAY, TRING, HERTS</b>
<b>Applicant</b>	<b>CALA Management, C/o Agent</b>
<b>Case Officer</b>	<b>Andrew Parrish</b>
<b>Referral to Committee</b>	<b>Due to the Contrary views of the Town Council</b>

## 1. Recommendation

1.1 That planning permission be **DELEGATED WITH A VIEW TO APPROVAL** subject to:

- receipt of amended plans and information as detailed in the report
- receipt of no objections from Herts Highways
- receipt of no objections from HCC Ecology Officer with regards to seeking greater ecological enhancements
- receipt of no objections from Environmental Health in respect of noise
- final drafting of conditions and / or such other conditions as may be required
- agreement of pre-commencement conditions with applicant, and
- completion of a s106 agreement.

## 2. Summary

2.1 The proposed development of the site for 226 dwellings, including 90 affordable homes, together with 0.75 ha of employment uses is in accordance with Local Allocation LA5 as referenced within the Council's Core Strategy and Site Allocations DPD. Except as noted in the report, the proposal would comply with the key principles of the LA5 Master Plan and include significant planning benefits, including provision of public open space and cemetery use that would be secured by s106 agreement.

2.2 Whilst the provision of 226 dwellings is higher than the Site Allocations DPD and Master Plan range of 180-200, those documents make clear that the final capacity of the site is to be established as part of a planning application. The proposal at 226 dwellings would still represent a relatively low density in keeping with the edge of town location and is not considered to result in any material harm. It would provide good levels of green space and tree planting and would optimise the use of the site as required by saved DBLP Policy 10 whilst complying with saved Policy 21 in terms of achieving a soft edge.

2.3 40% of the dwellings would be affordable homes which would be fairly evenly distributed and indistinguishable from market dwellings in terms of their materials.

Subject to an archaeological WSI by condition, there would be no adverse impact on heritage assets.

2.4 The proposed layout, design and materials has taken into consideration the Chilterns Buildings Design Guide and is generally considered acceptable in this regard subject to receipt of amended plans to address a number of minor changes, in particular in relation to the management and functionality of the cemetery northern buffer. Amended plans omit the two and a half storey apartment block from the Beaconsfield Road frontage in favour of 2 storey houses in response to objections. The employment area and cemetery extension plans are illustrative and will be subject to reserved matters approval in all regards apart from access.

2.5 The proposals would provide 6.76 hectares of public open space mostly in the western fields area that would serve a wider area than just the development as a significant public benefit. A green corridor, and children's play areas would also be provided that would serve both the development and wider area. No significant trees will be removed but there will be significant additional and supplementary tree planting as part of the development. A Landscape and Visual Assessment considers the overall visual harm to the AONB to be of a low order.

2.6 In highway terms, the two access points, one from Aylesbury Road and one from Icknield Way, the no through road and loop road layout comply with the LA5 Master Plan. Car parking numbers and layout are considered acceptable and in accordance with standards. Comments from Herts Highways on an updated Transport Assessment are still awaited and therefore at this stage there remains an outstanding objection from the Highway Authority to the original TA on grounds of insufficient information. Contributions to footways and other sustainable transport measures are requested. The proposals include the diversion of public footpath 48a and the provision of a number of other routes including an east-west footpath/cycle path from Donkey Lane through the central green corridor and across the western fields to the A41. These are acceptable subject to agreement via the s106 agreement on their status and surfacing.

2.7 There would be no adverse impact on residential amenities. Amended plans reduce the height of dwellings backing onto Okeley Lane properties and introduce a gated, landscaped buffer strip. Proposed set back distances within the layout are generally acceptable.

2.8 The site has been assessed as of relatively low ecological value and there are no European Protected Species. The Herts Ecology Officer considers the ecological assessments to be reliable but with regards to the Landscape Management Plan, he has raised a number of criticisms. His comments on an updated Landscaping and Management Strategy are awaited. The proposals are not in an area of high flood risk and the drainage strategy has been developed along SUDS principles to provide sufficient drainage for a 1 in 100 year (+40% for climate change) event. The application is supported by an Environmental Noise Survey that proposes measures to mitigate the proposed dwellings from existing road and industrial noise sources. However, there are outstanding objections from Environmental Health and at this stage it is understood that the parties are still in discussions with regards to an updated acoustic assessment.

2.9 Subject to further information from the applicant on the sustainability aspects of the development, the proposals would demonstrate that the sustainability principles of the Core Strategy as expressed through Policy CS29 would be met. A section 106 agreement is recommended to secure the infrastructure and other benefits sought by LA5 Master Plan which have been agreed in principle with the applicant.

2.10 The proposals would make a significant and much needed contribution to meeting housing requirements in the Borough as expressed through Core Strategy Policy CS17 and the increase to 756 dwellings per year as anticipated within the emerging Dacorum Single Local Plan. Whilst there would be a low level of harm to the AONB, this harm is considered to be more than offset by the benefits associated with the delivery of the LA5 allocation within the Core Strategy and Site Allocations DPD in order to meet the housing, employment and wider objectives set out in these documents. The proposal is therefore recommended for delegated approval subject to resolving the outstanding issues noted in the report, including the completion of an s106 agreement.

### **3. Site Description**

3.1 The site (Land Allocation LA5) comprises a triangle of greenfield land lying immediately to

the west of Tring. It measures 18.3 hectares in size and comprises six fields, including one large paddock, two small paddocks and three medium sized arable fields. It lies approximately 1.4 km from the town centre.

3.2 The site is bounded by Icknield Way (B488) to the north, Aylesbury Road (B4635) to the south and existing housing to the east. Tring cemetery is located on the edge of the site's south-eastern boundary.

3.3 The western side of the site is predominantly arable land and the eastern side is grassland. The small paddock alongside Aylesbury Road to the south of the site contains a small single storey storage building and a series of sheds and shelters associated with its paddock use. There is a small vacant telephone repeater station in the frontage to Aylesbury Road which is excluded from the site. The fields are divided by hedgerows and tree belts of varying condition.

3.4 The site slopes southward towards Aylesbury Road and is dissected by 2 public footpaths running towards Beeches Farm on Icknield Way, one from Aylesbury Road to the south (footpath 71) and one from Okeley Lane to the east (footpath 48a) within the existing built up area of Tring. There are some open views across part of the site and the site forms a green gateway to Tring in the approach to the town from the A41.

3.5 The western part of the site (7.9 hectares) falls within the Chilterns AONB. The eastern part of the site together with part of the western area (for the cemetery extension) was removed from the Green Belt in July 2017 in anticipation of Land Allocation LA5.

#### **4. Proposal**

4.1 The proposal has been submitted as a hybrid application (part outline and part detailed). It seeks:

4.2 Full planning permission for the demolition of existing buildings and erection of 226 dwellings with vehicular access from Aylesbury Road and Icknield Way, creation of new car park and toilet facilities for the cemetery extension, landscaping and other associated infrastructure including creation of formal and informal open space to the west of the development. The detailed breakdown is as follows:

- Removal of existing sheds on site.
- The erection of 226 houses of 2 to 2.5 storeys.
- 40% affordable housing, split 75% rented and 25% shared ownership.
- Vehicular access from Icknield Way and Aylesbury Road.
- Pedestrian accesses to Beaconsfield Road and Okeley Lane.
- 30 space car park associated with the existing cemetery and proposed extension.
- Toilet block to serve the existing cemetery and proposed extension.
- Incorporation of Footpath 71 and diversion of Footpath 48a.
- 6.76 hectares of public open space.
- Permissive footpath within linear open space.
- 1 Local Area of Play (LAP) within the residential development, and 1 Neighbourhood Equipped Area of Play (NEAP) within the open space to the west.
- Landscaping and planting (soft landscaping).
- Internal road and footpath network (hard landscaping).

4.3 Outline planning permission for provision of 0.75 hectares of employment land for B1 Business use (offices, research and development, and light industrial) with all matters reserved with the exception of access arrangements, and outline planning permission for 1.7 hectares of

land for an extension to Tring cemetery.

## **5. Relevant Planning History**

5.1 None

## **6. Policies**

### 6.1 National Policy Guidance

National Planning Policy Framework (NPPF)

National Planning Policy Guidance (NPPG)

### 6.2 Adopted Core Strategy

NP1, CS1, 2, 3, 4, 5, 8, 9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 23, 24, 25, 26, 27, 29, 31, 32, 35

Appendices 1, 3, 4, 5, 6 and 8

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

Policies 12, 13, 18, 21, 31, 37, 51, 54, 55, 57, 58, 62, 76, 79, 80, 81, 97, 99, 100, 101, 102, 108, 111, 113, 118, 129

### 6.4 Site Allocations Development Plan Document 2006-2031 (July 2017)

Policies SA8, LA5

Proposals GB/9, C/1, T/21, E/1, L/3

### 6.5 HCC Waste Core Strategy and Development Management Policies Development Plan Document 2012

Policies 1, 2, 12

### 6.6 Supplementary Planning Guidance / Documents

- Local Allocation LA5 Icknield Way West of Tring Master Plan (July 2017)
- Environmental Guidelines (May 2004)
- Water Conservation & Sustainable Drainage (June 2005)
- Energy Efficiency & Conservation (June 2006)
- Accessibility Zones for the Application of car Parking Standards (July 2002)
- Landscape Character Assessment (May 2004)
- Chilterns Buildings Design Guide (Feb 2013)
- Planning Obligations (April 2011)
- Affordable Housing (Jan 2013)

### 6.7 Advice Notes and Appraisals

- Sustainable Development Advice Note (Dec 2016)
- Sustainable Drainage Policy Statement (Feb 2015)
- Refuse Storage Guidance Note (Feb 2015)
- Affordable Housing SPD - Clarification Note (July 2016)
- Policy Advice Note (May 2017)

## **7. Constraints**

### 7.1 Existing planning constraints:

- Article 4 Direction - structures for poultry production
- Chilterns AONB
- Right Of Way
- Green Belt
- Adjoins General Employment Area
- Adjoins Historic Park and Garden

### 7.2 LA5 Master Plan constraints:

- Provide mix of house types / 40% affordable housing
- 2-storey height limit except at focal points / interest
- Limit impact of buildings on Chilterns AONB
- Create soft transition to GB / AONB
- Conserve special quality of land in AONB
- Create defensible new GB boundary
- Limit harm to views from surrounding countryside
- Preserve views out towards Chilterns escarpment
- Avoid road access from existing residential area
- Respect privacy of neighbouring properties
- Protect and enhance existing network of trees / hedgerows
- Retain existing PROW
- Protect setting of cemetery with a buffer

## **8. Representations**

### Consultation responses

8.1 These are reproduced in full at Appendix A

### Neighbour notification/site notice responses

8.2 These are reproduced in full at Appendix B

## **9. Considerations**

### Main issues

9.1 The main issues to consider are:

- Policy and Principle
- Delivery and Phasing
- Capacity, Density and Numbers
- Size, Tenure and Affordable Housing
- Impact on Heritage Assets and Archaeology
- Design, Layout and Appearance
- Employment Area
- Cemetery Extension
- Green Space, Trees and Landscaping

- Landscape and Visual Assessment
- Impact on Highway Safety
- Footpaths and Rights of Way
- Residential Amenities
- Ecology
- Flood Risk
- Noise
- Sustainable Design and Construction
- Infrastructure, CIL and Planning Obligations
- Other Material Considerations

### Policy and Principle

9.2 The site comprises greenfield land that falls partly within the Green Belt and partly within an area excluded from the Green Belt. The site is allocated for development within the Core Strategy as Local Allocation LA5 within Tring Place Strategy, which incorporates residential, employment and burial space land uses as well as open space.

9.3 The site is the subject of a detailed allocation for housing and employment uses within the Site Allocation Development Plan Document adopted 12 July 2017 which formally released part of the site from the Green Belt for residential, employment and cemetery uses.

9.4 The site allocation is supported by a Master Plan document that sets out in some detail the elements of design, layout and infrastructure sought by the Council. This was adopted concurrently with the Site Allocation DPD. The principle of residential, employment, cemetery and open space uses is therefore acceptable in accordance with the Site Allocations DPD and LA5 Master Plan.

9.5 The built elements of the development would be confined to the area excluded from the Green Belt on the eastern part of the site whilst the Green Belt to the west would only be used for open space and outdoor leisure / recreational uses in accordance with the Master Plan. Accordingly, in proposing only the provision of appropriate facilities (in connection with the change of use of the land) for outdoor sport and outdoor recreation that, by reason of their small scale and sensitive design, are also considered to preserve the openness of the Green Belt and not to conflict with the purposes of including land within it, the proposals would be classed as appropriate development in the Green Belt and would therefore comply with Policy CS5 and NPPF para.145.

### Delivery and Phasing

9.6 Whilst Core Strategy Policy CS3 states that local allocations will be delivered from 2021, it does also say that the release date of any local allocation may be brought forward in order to maintain a five year housing land supply. The Council is now failing to maintain a 5 year housing land supply and in recognition of this the Site Allocations DPD and Master Plan make clear that it is appropriate for the site to be brought forward for development immediately and to be developed in phases in accordance with the Master Plan. Accordingly, the timing of this application corresponds with this. Furthermore, given likely lead-in times before the first dwellings are completed, the development may not be too far ahead of the above date.

### Capacity, Density and Numbers

9.7 The Town Council's view that a more radical approach to design is needed in the context of *"accelerating pressure to build more houses whilst the supply of suitable sites dwindles"* is noted. The implication appears to be that more houses should be accommodated on the site but of a better overall design.

9.8 The above said, a large number of representations nevertheless take the view that the number of houses needed to be reduced and in response, amended plans do reduce the number of units by 14, allowing for a more spacious design.

9.9 The residential development now comprises 226 new dwellings on 9.1 hectares, 0.75 hectares of employment land, 1.70 hectare cemetery extension and 6.76 hectares of open space. Total 18.3 ha.

9.10 Whilst the development proposed is for 226 dwellings rather than the 180-200 stated within the Site Allocations DPD and Master Plan, those documents make clear that the final capacity of the site is to be established as part of a planning application. The Site Allocations DPD clearly states:

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

9.11 The estimated housing capacity is higher than the figure of 150 stated in the Core Strategy. However, this reflects detailed testing during the preparation of the Master Plan. In particular at Core Strategy stage, it was assumed the cemetery extension would fall outside the AONB (smaller but within the housing area now proposed). However, during the master planning stage the Bereavement Services Manager's requirement was for a larger area based on a 100 year capacity which could not be accommodated satisfactorily within the eastern area without significantly reducing the size of the housing area. There was also uncertainty over the size of the employment area. Due to these factors the overall capacity of the site was assessed at around 150.

9.12 Saved Policy 21 seeks to ensure that careful consideration is given to the density of all new housing proposals to ensure they make efficient use of the land available and states that densities will generally be expected to be in the range of 30 to 50 dwellings per hectare (net). Whilst it states that proposals which have a density of below 30 dwellings per hectare net should be avoided, it does nevertheless recognise that *"For sites at the edge of an urban area, special attention will be paid to the effect of development density on open countryside and views. In such locations proposals will be expected to retain existing trees and hedges and incorporate appropriate landscaping in order to achieve a soft edge to the countryside."*

9.13 The Master Plan states that the housing development will involve low and medium density in recognition of the edge of town location and the design and landscape development principles in Chapter 6. It does not seek a specific density figure although relates the estimated capacity to a density well under 30 dwellings per hectare (net), allowing the new development to be well landscaped. The revised estimated capacity of around 180-200 would be 23 dph (net) based on the site area within the Master Plan of 8.7 ha.

9.14 The application is supported by extensive technical and design work which has informed the residential capacity of the site. The proposal at 226 dwellings would still represent a relatively low density in keeping with the edge of town location and the existing character of the adjoining area. The proposed development would have a density slightly higher than that assessed but still well under 30 dwellings per hectare at 24.5 net based on a site area of 9.2 ha. As such the proposals would accord with the Master Plan requirement to achieve density well under 30 dph (net).

9.15 In accordance with the requirements of the Master Plan, the housing would involve low and medium density development, including a range of house types to deliver a balanced community to meet a variety of local needs. Most of the open market housing would consist of

family housing, including some larger, more spacious properties on the edge of the development to the west (proposed Green Edge character area) which would reflect the edge of town location and the design and landscape principles of the Master Plan.

9.17 The dwelling types comprise a mix of modern apartments blocks, terraces, semi-detached and larger detached houses which would be relatively evenly spread throughout the development area with no particular bias towards the existing urban area in terms of house type or size except as necessary in regards to reinforcing the three proposed character areas types.

9.18 The overall density achieved is not considered to result in any material harm to the character of the local area / edge of countryside location in this case and would optimise the use of the site as required by saved Policy 10 of the Local Plan whilst at the same time complying with saved Policy 21 in terms of achieving a soft edge. The small uplift in density over the Master Plan is also considered to be appropriate and in line with NPPF guidance that seeks to ensure policies and decisions *"promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions."* It will also help to make a small additional contribution to the anticipated need in Dacorum to provide of 756 homes per year in the plan period 2013-2036 within the emerging Dacorum Single Local Plan (in accordance with the South West Hertfordshire SHMA). Up from 430 homes per year under the Dacorum Borough Local Plan 1991-2011.

#### Size, Tenure and Affordable Housing

9.19 Policy CS18 states that new development should provide a choice of homes comprising a range of housing types, sizes and tenures, housing for those with special needs, and affordable housing in accordance with Policy CS19 with decisions on the appropriate type of mix of homes guided by the strategic housing market assessments and other needs surveys.

9.20 Policy CS19 states that 35% of new dwellings on qualifying sites should be affordable units with higher levels on sites which are specified in a development plan document and a minimum of 75% for rent.

9.21 The South West Hertfordshire SHMA January 2016 sets out the needs for the strategic housing market area (SHMA) that incorporates Dacorum Borough. The findings of the SHMA show that in terms of market housing the greatest need is for 3 bedroom housing across the housing market area but that there is a higher demand for 4+ bed dwellings within Dacorum Borough than across the rest of the SHMA. In terms of affordable housing the need is generally for smaller dwellings of 1 and 2 bedrooms. In terms of the make up of affordable housing provision, the SHMA states that 30% should be made up of intermediate housing, with the remaining 70% being social rented, in the case of Dacorum.

9.22 As the most up to date document, Policy LA5 of the Site Allocations DPD July 2017 states that the site should provide an estimated 40% affordable housing, comprising 75% rented and 25% shared ownership, which is followed through in the Master Plan principles.

9.23 The Affordable Housing Supplementary Planning Document (SPD) 2013 is the most relevant source of guidance on the design and layout of affordable housing. The SPD includes the requirement to avoid high concentrations of affordable housing in specific areas within larger developments. The Master Plan states that the Council expects affordable housing to be indistinguishable from market housing in terms of design and to be dispersed across the site.

9.24 In terms of tenure, 40% of the proposed dwellings will be classed as affordable with 75% rented and 25% shared ownership. The tenure split will be finalised as part of the s106 agreement negotiations. In terms of size, the majority of the market units will be 4 bedroom

units (57%) whilst the majority of the affordable units will be 2 bedroom (49%). The proportions do not exactly correspond to the percentages outlined in the SHMA. Specifically there is a higher number of larger dwellings in terms of both affordable and market units. This corresponds to the provision set out within the LA5 Master Plan that the site should accommodate family and larger, more spacious properties, and also the SHMA which details a higher requirement for 4+ bedroom dwellings in Dacorum.

9.25 In terms of location, the affordable housing will be fairly evenly dispersed throughout the site, albeit with concentrations in some areas owing to the presence of flats and terraces, and for practical reasons to meet Registered Social Landlords requirements on transfer and management, and urban design reasons to avoid large blocks on the urban edge. The design of the affordable housing will also be indistinguishable from market dwellings, utilising the same palette of materials.

9.26 The affordable housing element of the proposal is in accordance with guidance within the LA5 Master Plan and Affordable Housing SPD.

9.27 The Strategic Housing Team has raised no objections to the proposals subject to selecting the appropriate mix of affordable housing to meet demand in Dacorum.

9.28 It would be recommended that the affordable housing be secured through a s106 agreement.

#### Impact on Heritage Assets and Archaeology

9.29 The submitted Archaeology Desk Based Assessment confirms that there are no statutory listed heritage assets within the site, or within close proximity so as to be affected by the development.

9.30 While there are no statutory designated assets on or in the vicinity of the site, Tring Cemetery is included on a local register of historic parks and gardens. In 2010, the Hertfordshire Gardens Trust produced a document called 'Conservation Local List' for Dacorum. This document describes Tring Cemetery as:

*"An unspoiled Victorian Cemetery with picturesque chapel and lodge in the local 'Rothschild' style. Situated at the western approach to Tring, it forms a green gateway to the town."*

9.31 In addition to this the lodge, chapel, boundary gates and gate piers are regarded as local heritage assets. Therefore, the cemetery constitutes an important heritage asset and its green and open setting and historic buildings and features should be protected.

9.32 The Landscape Principles in the Master Plan seek to protect the green and open setting of Tring Cemetery by providing a landscape buffer around 6 metres wide between the southern housing area and the cemetery which should not be located within private gardens.

9.33 The proposed layout and Landscaping Strategy proposes a 6m setback and planting between residential development and the heritage asset which will preserve its setting. The buffers will not rely on gardens to achieve this. The proposals would therefore comply with the Master Plan principles and would accord with Policy CS27.

9.34 In 2013, the site was the subject of an archaeological desk-based assessment, geophysical survey and limited field evaluation to test the results of the geophysics. No heritage assets of sufficient quality or extent to represent a constraint on the allocation of the site for housing were identified. However, the percentage of trial trenching was very low and it is possible that discrete archaeological features or small sites may exist in areas not examined during the evaluation. The Planning Statement submitted with the application proposes to

undertake such an evaluation post planning consent, to be secured by planning condition. An archaeological desk-based assessment, submitted to support the planning application, also concluded that further trial trenching evaluation was necessary, although concerningly seemed unaware of the geophysics/trial trenching that has already taken place.

9.35 The Historic Environment Advisor therefore recommends a Written Scheme of Investigation be submitted, and site investigation and post investigation assessment be undertaken pursuant to an archaeological condition.

9.36 Subject to this, given the lack of any significant harm, the proposals are in accordance with NPPF paragraph 128, as well as Core Strategy Policy CS27 and Local Plan Policy 118.

#### Design, Layout and Appearance

9.37 With regards to the housing area, the Master Plan sets out a number of design principles as follows:

- Limit buildings to two storeys, except where a higher element would create interest and focal points in the street scene, particularly to create a central focal point in the development area.
- Provide a legible high quality design, through the use of key buildings, groupings and edges.
- Take the character of buildings in the Chilterns area as a guide to high quality attractive design.
- Use traditional materials, such as red brick, clay tile and timber boarding, where feasible.
- Ensure sufficient, well-located parking.
- Arrange buildings and routes to achieve natural surveillance, good pedestrian access to facilities and an attractive relationship to open spaces.
- Plan the interface of the development area with existing homes, the cemetery and open space carefully to protect local amenity, including landscaped buffers where appropriate.
- Secure high sustainability standards in design and construction.

9.38 In terms of layout, the basic framework is developed around a series of perimeter development blocks and looped roads that provide good permeability throughout the development. The road layout is based on a loose rectilinear layout but with a sinuosity that creates flowing frontages and helps the road structure disappear within the framework of buildings and landscaped areas.

9.39 The overall housing site is divided by a central green corridor running east-west through the site, comprising clusters of trees, SUDS and a Local Play Area together with an east-west footpath/cycle route. In accordance with the Master Plan, the northern and southern housing areas would be connected only by a footpath with vehicular access for emergencies only. The central swathe of open space will help to soften development in wider views and integrate the built-form into its setting.

9.40 Each housing area would be divided into three character area types creating a gradient of development intensity that is higher within the core areas, and lower on its western edges and facing the green corridor. This would create a transition between the new settlement edge and the wider countryside to the west. The housing areas are further broken up by secondary green areas running east-west that would help integrate green infrastructure into the site. Pedestrian routes connecting the existing residential and cemetery area to the east with new open space to the west would follow these corridors. The primary access roads into both the northern and southern areas would be tree lined, creating a pleasant avenue approach to each area, with a focal treed amenity green at the first road deviation and a sense of arrival at the main green corridor. The circular loop roads would lead to shared surface residential access

roads.

9.41 All dwellings, in facing outwards from their perimeter block onto roads or green space, would ensure good natural surveillance within the development. Apartment blocks would act as focal points and gateways to key public realm areas and at corner locations are designed to turn the corner with dual active frontages. A similar concept is applied to houses at corner locations.

9.42 In terms of height and scale, the Master Plan states that dwellings at a height of 2 storeys should comprise the majority of residential development on the site. However, the design principles do stipulate that this height can be increased to create interest and focal points.

9.43 The distribution of building heights within the proposed development has been guided by a study of the existing character of Tring and is considered consistent with the aspirations of the Master Plan for LA5, with higher buildings used as a focal point or to add variety within the streetscape, both apartment blocks and houses.

9.44 It is noted that the heights proposed have been assessed as part of the submitted Landscape and Visual Impact Assessment which has confirmed that development comprising these heights would not have a negative impact in landscape terms.

9.45 Whilst the apartment blocks would generally be larger in size and height to the dwellings, the overall size, height, form and layout of the development would nevertheless retain a human scale and exhibit an overall grain that is considered consistent with that in the adjoining built up area to the east. The proposals would therefore relate well in these terms to the surrounding context.

9.46 In response to a number of objections from residents, and the Town Council, the layout has been amended so that the 2 and a half storey apartment block no longer fronts Beaconsfield Road where it was considered to result in an overbearing appearance to the street scene, out of keeping with the predominant character of bungalows in the western part of this road. The apartment block has effectively been swapped with the 2 storey dwellings situated at the other end of the row. In this respect the proposal is considered more sensitive to the character of the existing residential area and is considered to comply with Policies CS11 and 12 of the Core Strategy.

9.47 In terms of appearance, The design principles within the Master Plan state that the character of buildings in the Chilterns area should be used as a guide for attractive design and that traditional materials such as red brick, tiles and timber boarding should be used where feasible. The Chilterns Buildings Design Guide is relevant.

9.48 There are a variety of materials and design found in the immediate residential area, some of which do not strongly reflect the more traditional features and materials found in buildings of the AONB, in particular painted render, bargeboards and deep fascias, white timber cladding, pantiles. Others such as plain tile, flint, red brick, such as used on the The lodge and Chapel within Tring Cemetery, or on some recent development at the western end of Beaconsfield Road are more appropriate.

9.49 The development proposes a traditional architectural approach of pitched tiled roofs over brick walls and use of dormer windows and some chimneys. Key materials are a variety of locally sourced bricks, including red detail brick, use of flint, plain tile and slate. Other materials would include white uPVC windows, Black uPVC fascias and rainwater goods. A variety of boundary treatments will be used including low brick walls, timber boarded fencing and native species hedges to reflect the edge of settlement location. Although there is a diverse palette of materials these are proposed to be used in a carefully coordinated way to ensure that the architecture has a calm and considered quality and is not visually chaotic.

9.50 The development proposes a unifying palette of materials, but variations in form, size and style would create distinctive character areas. The site has been designed to create a series of complementary character areas through varying architectural styles. There are three key character areas within the development.

### 1. Green Edge

9.51 Facing onto the western edge, Icknield Way and Aylesbury Road, these edges are the most visually prominent, especially from the west. The key features of this area are detached and semi-detached housing types to create a broken development pattern, larger houses with frontages that overlook the open space and wider countryside, landscaped frontages, shared surface streets, brick and flint detailing, specific window, bargeboard and head details.

### 2. Central Spine

9.52 Sitting at the core of the site, the key to the success of this area is to allow easy movement through to the green corridor and high quality space. The key features of this area is more structured frontages with stepping to create variety in the street scene, building forms that pull away from the spine road with formal street planting, a variety of dwelling typologies from detached, semi-detached, terraced forms, and apartment blocks, mainly traditional carriageway forms with some shared surface, 2.5 storeys on key corners and brick with flint detailing on specific plots.

### 3. Inner Green Edge

9.53 Facing onto the Green Corridor, the key consideration is that the buildings are of an appropriate scale so that the landscape dominates. Detached, semi-detached and terraced forms, mainly 2 storey with some 2.5 storey on key corners, a combination of organic and structured frontages depending on location, a mix of surface treatments, brick with flint detail on specific plots, specific window, bargeboard and head details.

9.54 Amended plans have followed discussion with the Conservation and Design Officer with regards to a number of details of design and materials in relation to specific house types and street scenes so that the proposals both reflect good design practice and better reflect the sensitive location adjacent to the Chilterns AONB. The Conservation and Design Officer considers that the revised proposals would be appropriate to the edge of settlement location adjacent to the AONB and would preserve the setting of the Tring Cemetery.

9.55 Subject to samples of materials by condition, the proposals are considered to accord with the LA5 Master Plan principles, and with Policies CS10, 11, 12 and 13 and 27 of the Core Strategy.

### Employment Area

9.56 An important principle of the LA5 Master Plan and DPD allocation is the provision of 0.75 ha of employment land in the NE corner of the site in order to provide scope for local firms wishing to expand, for firms relocating from existing premises in older, poorer quality in-town sites and for firms new to the area.

9.57 The Master Plan seeks to give preference to accommodating local businesses on the new employment land and acknowledges that the site will not be a suitable location for development within use classes B2 (general industrial) or B8 (storage and distribution) given the location adjacent to housing. Therefore, development should be restricted to use class B1 (business use), which covers offices, research and development and light industrial uses.

9.58 Another important principle is that the employment area should be screened from the new housing.

9.59 As part of the outline proposals for the site, the application proposes a 0.75 hectares provision of land in accordance with the Master Plan principles restricted to B1 uses.

9.60 The proposed employment area is in outline and details of the scale, layout, appearance and design of buildings for this area would be for later consideration under a reserved matters application. A potential design and location is however shown in the Illustrative Site Masterplan (C102F).

9.61 The employment area extension is indicated to be softened with a wide landscape strip and tree planting fronting the new access road. Planting is also indicated alongside its southern boundary with new housing. The east and north boundaries would retain existing planting.

9.62 Whilst the plans are only in outline with all matters other than access reserved, the below principles are indicated to be followed within the DAS:

- Buildings limited to two storeys, except where a higher element would create interest and focal points in the street scene, particularly to create a central focal point in the development area.
- Buildings designed taking into account the relationship with the proposed new housing.
- A legible high quality design through the use of key buildings, groupings and edges.
- A variation in roof form to create a transition from the employment area to the new residential development.
- The character of buildings in the Chilterns area to be used as a guide to create high quality attractive design.
- Use traditional materials, such as red brick, clay tile and timber boarding, where feasible.
- Well-located and sufficient car and secure cycle parking.
- Buildings and routes arranged to achieve natural surveillance, good pedestrian access and an attractive relationship to open spaces.
- The interface of the development area with existing homes, the cemetery and open space carefully planned to protect local amenity and landscape buffers.
- Sustainable design and construction.

9.63 Two vehicular accesses are proposed within the development, a short distance from the main junction with Icknield Way. The illustrative sketch shows the built-form broken down into three elements, with unit one having a frontage to both Icknield Way and central courtyard area where car parking provision is indicated.

9.64 The central block has scope to be slightly larger given the back drop of the existing industrial estate, and units six and seven help contain the site away from residential properties by sitting at 90 degrees.

9.65 The layout would have a relatively spacious appearance with generous space for landscaping to soften the development in wider views.

9.66 It would include a total of 77 parking spaces with sufficient turning space and room for associated deliveries. Secure cycle parking and refuse bins are also shown to be accommodated.

9.67 The illustrative plan indicates that the total indicative floor space of 2160m<sup>2</sup> / 23,250 sq ft with one parking space per 30 m<sup>2</sup> floorspace and maximum of two storeys can be satisfactorily accommodated on the site without harm to the new housing area or street scene.

9.68 Details of appearance, landscaping, scale and materials are to be reserved by condition. Access is considered later in this report. A condition would be expedient to clarify that the details within the DAS should be closely followed. A condition would also be recommended to restrict the use to Class B1. A condition restricting the use to local firms or businesses, whilst ostensibly desirable in accordance with the Master Plan, is considered difficult to justify in planning terms given the absence of hard evidence that there are local firms wishing to relocate, or that firms from outside the area would be more harmful. It is considered that this aspect should therefore be left to the market to decide.

9.69 Subject to the above, the employment land would comply with the Master Plan principles and wider Core Strategy Policies CS10, 11, 12 and 13.

### Cemetery Extension

9.70 Space for further full burials and cremation burials at the existing cemetery is limited. In addition, there is no space for natural burials (also known as green or woodland burials), which are becoming increasingly popular.

9.71 Consideration has been given to extending the existing cemetery to the north and west. However, this approach is not favoured by the Council because the amount of land available for a cemetery extension in this location falls well short of the 1.7 hectares sought. Also, there are some operational disadvantages in extending the cemetery in this manner.

9.72 Therefore, a detached cemetery extension in the western fields is proposed. This would have some operational disadvantages, but not of a serious nature. It would mean that the long term needs for burials in Tring can be met. As this is of great importance to the town, locating the cemetery extension in the western fields is the Council's preferred approach.

9.73 The Master Plan and Policy LA5 of the DPD requires a detached extension to the cemetery of around 1.6 hectares in the western fields, and also car parking for the cemetery in the eastern fields development area. Specific requirements are:

- Access from Aylesbury Road.
- Site to be well landscaped (particularly along its boundaries), appropriate to its location within the Chilterns Area of Outstanding Natural Beauty (AONB)
- Protected species surveys and incorporate appropriate requirements to ensure there would be no adverse impacts.
- Include appropriate parking area (of at least 30 spaces) and ancillary building and yard within the adjacent development area (i.e. on land excluded from the Green Belt) to meet service needs (e.g. toilets).

9.74 The proposals include land for a cemetery extension in outline for which details will be sought under reserved matters. The land would be located to the west of the proposed residential area within the AONB but on land excluded from the Green Belt in accordance with the DPD. Whilst not required immediately, this is a significant long term benefit which will contribute towards the infrastructure of Tring.

9.75 Furthermore, a proposed 30 space car park and toilet block, for which full permission is sought, will also serve the existing cemetery and therefore represents a more immediate benefit to the community.

9.76 At present there is no car park serving the existing cemetery and it is proposed that the car park will serve both the existing and proposed cemetery areas. The car park would be accessed immediately after turning into the development from Aylesbury Road. The existing cemetery will be accessed via a pedestrian link within the development so that visitors using

the car park will be able to walk to the existing Chapel. A wide landscaped and treed verge is provided for this purpose. The link will also provide access for vehicles and equipment used in maintaining the proposed cemetery extension and also for hearses.

9.77 The proposed new burial space is within the AONB, so great importance is attached to creating a green cemetery that blends harmoniously into the countryside. The site for the cemetery extension is already partly screened by the tree belt along Aylesbury Road and the existing hedgerows within the site. Further planting is to be carried out to soften the impact of the cemetery extension and help to create a long term defensible Green Belt boundary. It is envisaged that a significant amount of land will be reserved for natural burials. Part of this area will involve the planting of trees to mark graves and part will take the form of a wildflower meadow. This will ensure that the cemetery extension does not cause serious harm to the primary purposes of the AONB. Indeed, the development would conserve and enhance the natural beauty of the AONB through new planting.

9.78 It is recommended that final details of landscaping to the car park / toilet block are secured by condition. Details in relation to the cemetery extension relating to hard and soft landscaping including any fixed surface infrastructure, would be secured as part of the reserved matters pursuant to the outline element of the application.

9.79 Although the CIL Regulation 123 list excludes burial space from being sought via s106, as the proposal forms a key part of the DPD and Master Plan requirements, the transfer of the land to DBC for cemetery use together with the associated car park and toilet block should be secured within the s106 agreement.

9.80 The proposals cemetery extension and facilities would accord with the Master Plan principles and, subject to the above, would comply with Policies CS10, 11, 12, 13 and 27 and saved Policy 97 of the Local Plan.

#### Green Space, Trees and Landscaping

9.81 The provision of significant new green infrastructure is a very distinctive part of the Master Plan for LA5. It proposes the creation of a major new area of public open space in the western fields within the Chilterns AONB and also a new network of intimate open spaces and a green corridor within the development site itself.

9.82 The Council's preference as expressed through the Master Plan is for the open space in the western fields to provide a mix of parkland and open space, in order to conserve and enhance the natural beauty of the Chilterns AONB. However, the Council has undertaken an Outdoor Leisure Facilities Assessment and an Action Plan, which indicates some shortages of playing pitch provision in Tring. Therefore, the possibility of providing playing pitches in the western fields should be retained. However, a large complex of playing pitches would harm the special qualities of the Chilterns AONB, so pitches are acceptable only on part of the western fields open space. Dunsford Farm is considered a more appropriate location for new formal playing fields provision to serve Tring residents.

9.83 There is also a requirement in the Master Plan to provide a toddlers play area (LAP) within the Green Corridor and a neighbourhood equipped play area (NEAP) within the western fields area with the latter designed creatively to fit with the Chilterns AONB such that brightly coloured metal equipment should be avoided. It should also include provision for activities to suit older children such as cycling, skateboarding or ball games.

9.84 Reinforcement of existing structural planting along existing field boundaries within the site to create a well structured and landscaped development with particular emphasis on enhancing existing screening and maintaining a treed skyline is a further requirement of the Master Plan. In particular the Landcape Principles seek to:

- Limit the effect of new building on views from the Chilterns AONB.
- Create a soft edge and transition with the AONB through the layout, design, density and landscaping and secure a defensible long term Green Belt boundary.
- Provide a network of landscaped open space within the development area, including screening of the new employment area.
- Protect the green and open setting of Tring Cemetery, which is a locally listed historic park or garden.
- Retain and enhance existing hedgerows and tree belts and provide new native tree planting and wildlife habitats in the western fields.

9.85 The development would provide 6.76 hectares of public open space with the majority of this comprising significant areas in the western fields. A green corridor would also be provided within the main housing area linking the existing residential area with the proposed western fields open space.

9.86 The site includes a LAP and a NEAP, with the latter including play equipment in accordance with details submitted and also a BMX track which has been designed to be sensitive to its location within the Green Belt and AONB.

9.87 An Arboricultural Report by EDP supports the application. The survey has identified 59 individual trees, 13 groups of trees and 10 hedgerows, totalling 82 items.

9.88 Of these 82 items, 9 have been categorised as A, of high quality and value; 41 have been categorised as B, of moderate quality; and 30 have been categorised as C, of low quality. In addition, 2 items have been categorised as U and due to their impaired condition are considered unsuitable for retention, irrespective of development. The majority of categorised A trees of high quality and value are found on the boundary of Tring Cemetery, particularly along the northern and eastern edge. The trees here comprise varieties of pine and beech which will be retained.

9.89 None of the trees are subject to a TPO.

9.90 No significant trees will be removed to facilitate the development other than a small section of the hedge along Icknield Way and Aylesbury Road to form the main access and the hedge within the green corridor. The latter was considered necessary in order to create a cohesive and functional public open space that visually links the northern and southern housing areas.

9.91 Significant new blocks of tree planting, hedge planting and landscaping to help reinforce the existing field boundaries is proposed along the western, northern and southern boundaries of the western fields open space in order to limit the impact of development on views within the AONB. This would include a woodland tree belt along the western edge of the proposed cemetery extension, a new boundary hedge along its northern edge and retention of the existing field hedgerow to the western edge of the new housing development itself. In these terms, it is considered that the proposals would create and ensure a defensible long term Green Belt boundary.

9.92 The proposed western boundary of the development site itself would be further softened and screened with supplementary tree planting groups, purposely limited to enable natural surveillance of the proposed NEAP to take place from the new houses. New street planting would also be incorporated along the main spine road frontages, within the green corridor and within the secondary green corridors whilst a landscaped 6 metre buffer would be retained between new housing and the existing cemetery. Illustrative plans also indicate that the proposed employment area would include significant street planting with buffer planting to the backs of dwellings bordering its southern boundary.

9.93 The Parks and Open Spaces Officer has raised concerns regarding the bike track, noting that it would be preferable if a skate park was provided or contributions made to the existing skate park in Tring. The applicants have however noted that a BMX track was considered in design terms to be more sensitive to its location within the Green Belt and AONB than a skate park. The Master Plan does indicate that such a facility should be sensitively designed and in this respect it might be more difficult to integrate a skate park with its ramps and concrete surfaces satisfactorily into the landscape. An update from the Parks and Open Spaces Officer will be provided at the meeting.

9.94 The Council's Trees and Woodlands Officer is in general supportive of the landscape plans and proposals with the exception of the layout in respect of open spaces being left to the rear of plots 155, 157-167 and to rear of plots 37, 40-54. This is considered under Residential Amenities below.

9.95 It would be recommended that the transfer of the open spaces to the Borough Council for public open space purposes together with appropriate maintenance contributions be secured through the s106 agreement and that details of the hard and soft landscaping be secured by condition for the private estate and by s106 agreement for the transferred areas.

9.96 The proposals would comply with the open space and landscape principles in the Master Plan and also contribute towards compliance with Policies CS10, CS12, CS13, CS25, CS26 and Local Plan Policies 99, 100 and 101.

#### Landscape and Visual Assessment

9.97 The applicant has submitted a comprehensive Landscape and Visual Appraisal (LVA) by landscape consultants EDP in support of the application.

9.98 With the exception of a section of the southern and northern boundary hedgerow, which is to be removed to facilitate access, the proposals would retain, reinforce and enhance the site's field boundary hedgerows. An internal hedgerow falling within the green corridor would be removed to avoid the division of the open space and ensure a more coherent area and residential scheme but this loss would be offset by substantial new planting within the western open space area which would lead to an enhancement of the landscape character of the Tring Gap Foothills Landscape Character Area and the Chilterns AONB with an overall neutral effect in the long term.

9.99 With regards to the development site itself inevitably there will be a high degree of change, and the very high sensitivity of the designated landscape would result in overall major/moderate effects, but this is as expected when development is extended into open fields and has been accepted in principle as part of the allocation process.

9.100 The LVA finds that the proposed development would have very limited effects upon visual amenity from the surrounding countryside due to the screening effects of the existing settlement edge to the east, restricted visibility of the site from the north due to the low lying topography, overlying landscape fabric and properties in close proximity to the site, and restricted visibility of the site from the Chiltern Hills to the south and south west due to the strong overlying structure of woodland, trees and hedgerows. Where views are possible from within the AONB, the LVA considers that the development would form a logical extension to the existing settlement and therefore would not significantly alter the overall landscape character and this would be moderated by increased landscaping. The effect of the low magnitude of change is rated as moderate / minor to moderate adverse in views from the south.

9.101 In terms of the existing cemetery, due to boundary walling and mature trees, the impact

of the development on views of this is found only to be minor to negligible in the long term with additional planting.

9.102 The site as proposed has been assessed to have a localised landscape effect owing to the loss of agricultural fields for development. However, when considered in the local context it does not constitute an unacceptable impact on the wider landscape, including the AONB. This is owing to the extensive landscaping proposals and mitigating effects of topography and landscaping.

9.103 The site falls within an area of intrinsically dark sky within the AONB (Zone E1) where it is important in accordance with Appendix 8 of the Local Plan that the level of new external lighting is strictly controlled within the rural area. Both Drayton Beauchamp Parish Council and the Chilterns Conservation Board expressed concerns about this in their comments and the applicant agrees via their consultant EDP that the detailed lighting design should use current best practice and technology, and should be agreed with the Local Planning Authority. To this end it is recommended that a detailed lighting scheme and statement should be secured by condition and agreed before any permanent external lighting is installed on the site and should follow the guidance of the Institution of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Light.

9.104 In conclusion the proposal would provide a soft edge to the AONB with filtered views of the built development, as well as providing a clearly defined edge to the Green Belt. The design of the open space would create a transition between the built development and the far western field, and introduce new recreational open space that would provide increased public access to countryside on the urban fringe. Subject to details of lighting, the proposals would preserve the dark sky environment.

9.105 The Conservation Officer has confirmed that he has no objections to the proposals in terms of their impact on the natural beauty of the AONB.

9.106 The Chilterns Conservation Board has commended the applicants response to the CCBs previous objections, welcoming the position on lighting, the new planting proposals, and subject to appropriate use of materials for paving, road surfaces and buildings along the western boundary which should draw on the Chilterns buildings Design Guide and technical supplements, and subject to the cemetery extension further enhancing the AONB by promoting design concepts derived from natural burial grounds within the UK for example with the design of woodland or wildflower meadows, and without headstones, tarmac drives and formal features. Details of these matters will be sought through appropriate conditions.

9.107 Subject to the above, the proposals are considered to conserve the natural beauty of the AONB in accordance with the Master Plan principles and will also comply with Policies CS10, CS12, CS13, CS25, CS26 and CS27 and Local Plan Policy 97.

#### Impact on Highway Safety

9.108 In accordance with the LA5 Master Plan, a new access onto Aylesbury Road and Icknield Way would be created. The Icknield Way access will provide access to the northern section of the residential area and to the employment land use. The Aylesbury Road access will provide access to the south section of the residential area and to the cemetery extension. The internal road layout will not connect between the north and south sections. However, an access route will be constructed through the central area which will only be available for use by emergency service vehicles. The detailed design and parameters of both accesses will be subject to the agreed S278 works.

9.109 The internal road layout would comprise circular loop roads together with turning heads on cul de sacs which would ensure a reasonably efficient layout from the viewpoint of refuse

collection. The concerns of the Crime Prevention Advisor that some form of traffic calming at the entrance and exit to stop mopeds driving through and round the development should be introduced has been raised with Herts Highways for their consideration and an update will be provided at the meeting.

9.110 On Icknield Way, it is proposed that the speed limit reduction to 40 mph is moved to the west of the site entrance whilst on Aylesbury Road a 40 mph speed limit is to be introduced west of the site entrance and the 30 mph speed limit moved to start at the site entrance. A Traffic Regulation Order would be required under a S278 or S38 agreement.

9.111 The proposed reduction in speed limits may make both roads more appealing to those travelling by bicycle but the lack of footways along Aylesbury Road and Icknield Way is not suitable for those wishing to access the site on foot. Accordingly, Herts Highways has said that S106 contributions will be sought to provide crossing points at the Aylesbury Road site access and to the provision of a footway along the south side of Icknield Way, east of the site.

9.112 Herts Highways have stated that a Construction Traffic Management Plan (CTMP) will be required to ensure that construction vehicles will not have a detrimental impact in the vicinity of the site and a condition will be required to provide adequate parking for construction vehicles on-site to prevent on-street conflict and impacts to highway safety.

9.113 A Travel Plan (TP) has been submitted with the application which proposes a number of measures in order to positively affect the modal shift towards more sustainable modes of transport and to reduce reliance on private vehicles. Herts Highways has said that the Travel Plan is satisfactory but that thought needs to be given to how residents are going to access the nearest bus stops.

9.114 Financial contributions of £6000 are sought to cover TP monitoring costs. Contributions of £8000 are also sought for provision of easy access kerbing and shelters at the busy stops on Aylesbury Road, and for footway provision on Aylesbury Road and Icknield Way and other measures, to ensure new residents can safely access both stops and cross the road to reach the bus stop on the opposite side of the road to the site, such as through a pedestrian refuge.

9.115 Contributions towards more strategic highway infrastructure would be secured via CIL.

9.116 The applicant provided a Transport Assessment (TA) and Travel Plan (TP) in support of the application. However, the TA was incomplete and did not incorporate the pre-application comments provided by HCC in April 2018. The Highway Authority therefore object to the proposed development on the grounds that there is not enough information to demonstrate that the proposals would not have a severe impact on the local highway network. A number of detailed criticisms are raised as follows:

- the applicant has not considered the Dacorum Borough Council Core Strategy (2013) or Roads in Hertfordshire: Highway Design Guide (3rd Edition).
- the proposed residential trip generation profile has not been amended
- the proposed employment land use trip generation profile has not been amended
- A net impact assessment of the proposed residential and employment land uses has not been provided
- The gravity model has not been provided.
- The junction capacity assessments are not included in the report.
- No collision data has been analysed by the applicant
- A vehicle tracking drawing for an 11.6m refuse vehicle should be provided rather than 9.25 m and suitable turning heads provided.
- In order to improve visibility, consideration should be given to 6m wide accesses with 10m radii. Consideration should also be given to providing the maximum visibility

splays at both accesses.

- The applicant should provide details of the drainage connections to the highway and a street lighting assessment for both accesses.
- Confirmation should be provided on whether the internal road will remain private or be offered for adoption.
- Consideration should be given to extending the proposed internal footway along the south side of Icknield Way to link with the existing footway to the north east.
- A footway should be provided on the access junction to allow crossing points that connect with the existing footway on the south side of Aylesbury Road.
- Footways should be provided to ensure connectivity to the bus route.
- A Stage 1 Road Safety Audit (RSA) should be provided by the applicant for the proposed new site accesses.
- The TA does not specify how many parking spaces will be provided for the proposed residential and employment land uses.
- The TA does not specify the number of disabled car parking spaces that will be provided.

9.117 An updated TA was submitted in September 2018. However, the comments of the Highway Authority have not yet been received and an update will be provided at the meeting.

9.118 Parking provision should accord with the maximum parking standards as assessed against saved Policy 58 and Appendix 5 of the Borough Plan.

9.119 Based on an indicated floorspace of 2,300 sq m, and assuming a worst case scenario of all B1 (a) office use a total of 76.66 spaces are required in accordance with Appendix 5 standards for the proposed employment area. 77 parking spaces are indicated on the illustrative layout together with manoeuvring and space for deliveries. The proposals therefore accord with Appendix 5 but final details of parking and layout would be considered at reserved matters stage. Suffice to say the illustrative layout indicates that this amount of floorspace could be accommodated.

9.120 With regards to the cemetery, the DPD and Master Plan seek the provision of a 30 space car park for visitors in connection with the cemetery extension as a planning benefit. This is shown on the proposed site layout and would comply with standards in respect of bay sizes and manoeuvring space.

9.121 226 dwellings are proposed as follows:

	<b>Number</b>	<b>Parking standard</b>	<b>Parking requirement</b>
<b>Affordable</b>			
1 bed	12	1.25	15
2 bed	44	1.5	66
3 bed	34	2.25	76.5
<b>Market</b>			
2 bed	14	1.5	21
3 bed	34	2.25	102
4 bed	78	3	234
5 bed	10	3	30
Total	226	NA	544.5

9.122 The site falls within Accessibility Zone 4 where the maximum parking provision in accordance with Policy 58 and Appendix 5 is 545 spaces. The development proposes 549 resident parking spaces across the site, including 45 visitor spaces, which would comply with

the standards. A range of parking solutions are proposed comprising detached garages, off-street parking to the front and sides of plots, parking within small parking courts located close to the units they serve, and on-street unallocated spaces.

9.123 Dimensions of parking spaces have been confirmed as follows:

<b>Parking space type</b>	<b>Minimum Dimensions</b>
Hardstandings	2.5 m x 5 m with 150mm buffer either side when situated between buildings
Single bays between flank walls	3.4 m minimum width
Double bays between flank walls	6 m minimum overall width
Single garages counting as parking spaces	3.25 m x 6m clear internal dimensions

9.124 The above larger than standard dimensions would ensure the spaces are reasonably useable for parking, helping to mitigate against potential on-street parking and calls to convert garaging on grounds they are unusable for parking.

9.125 Cycle parking in the form of sheds for the houses and cycle stores for the flats would be provided in accordance with standards in Appendix 5.

9.126 A condition securing parking and cycle parking provision would be recommended including a condition stipulating parking bay dimensions for the avoidance of doubt.

9.127 Refuse bin storage would be available for each of the houses within their rear gardens and within communal storage enclosures for the flats, which is generally considered acceptable in functional and visual terms. The refuse storage shed serving Plots 46-54 adjacent to the cemetery is to be relocated to ensure the cemetery buffer has clarity of status for reasons explained under the Residential Amenities section.

9.128 Other than the above, the proposed layout and provision is acceptable and is considered to comply with Appendix 5 and Policies 51 and 58.

#### Footpaths and Rights of Way

9.129 The site is traversed by definitive footpaths 048a and 071, both running towards Beeches Farm on the Icknield Way near the byway, Green Path. The former runs from the existing urban edge near the top of Okeley Lane cutting across the existing paddock. The latter runs from Aylesbury Road in a north-south orientation following the existing field boundary that will mark the edge of the proposed housing development.

9.130 The Development Principles in the Master Plan and DPD expect the existing rights of way to be retained but allow for a minor diversion of footpath 048a to facilitate the development. The footpath should be 2 m wide with a hard consolidated surface and retained as a public footpath designation. The Master Plan is clear that any diverted route for footpath 048a should be well landscaped, particularly at its western end, where it could be splayed to provide a more substantial landscaped area to help soften the interface of built development with the countryside. It should also be designed to allow some views of the Chilterns escarpment.

9.131 The Master Plan development principles seek to ensure that pedestrian and cycle routes into Tring and the surrounding countryside are improved. In particular footpath 071 should be upgraded to form a footpath/cycleway route which should be stone surfaced (2-3 m wide) and contained within a 5 m dedicated strip in the southern section where it runs between the existing hedgerow and proposed cemetery extension, and designated as a bridleway (or restricted byway).

9.132 Also, an east-west footpath/cycle link through the site from Aylesbury Road via Donkey Lane to the A41 roundabout should be provided. This should run along Donkey Lane (footpath 083) and through the middle of the development area along the proposed green corridor. It should then cut across the western fields. A link from the footpath/cycleway to Beaconsfield Road and Highfield Road is also required. The Donkey Lane section would be designated as a restricted byway with the northern part having a 3 m hard consolidated surface but no change to the existing stone surface at the southern end. The Green corridor section would have a 3 m wide hard consolidated surface and be designated as a bridleway. The western fields section would have a 2-3 metre wide stone surface, also designated as a bridleway.

9.133 A footpath link should be provided from the existing cemetery chapel to the new housing area. This link will form part of a direct pedestrian route between the existing cemetery and the cemetery extension. It is anticipated that this would be offered for adoption and would need to meet Herts Highways standards for adoption.

9.134 Finally, the Master Plan requires that a footpath be provided along Icknield Way on highway land between the northern spine road and Icknield Way Industrial Estate, again anticipated to be adopted by Herts Highways. This could either be north of the hedgerow or partly south through the land proposed for the employment development. If the latter this section would need to be designated if it falls outside the highway boundary.

9.135 The plans and details submitted as part of the application indicate that footpaths / cycleways would be provided as part of the proposals. However, the details of their specifications and designation are more vague.

9.136 It is stated that footpath 71 will remain in position and be integrated within the open space proposed in the western fields. The applicant has confirmed that the surface would be upgraded to make it suitable for cyclists and a change in designation to a bridleway to ensure that it can of right be used by cyclists. Details to be secured through the s106 agreement.

9.137 Footpath 48a is proposed to be diverted within the residential portion of the development. This diversion is proposed to be undertaken under Section 257 of the Town and Country Planning Act 1990. This is acceptable and it is recommended that this diversion be secured as part of the s106 agreement.

9.138 The applicant states that the public footpath that runs along Donkey Lane (footpath 083) to the east of the site falls outside of the site boundary and that, whilst the proposal will provide a footpath link to Beaconsfield Road which then links to Donkey Lane, no works are proposed on this particular route because it falls on third party land. Whilst this is accepted, we would nevertheless expect contributions to upgrading the surface of the 250 m stretch which has been calculated as circa £34,000. This is considered justifiable on sustainability grounds of providing reasonable improvements in footpath / cycle links and alternative means of travel to the car between the development and town centre/local facilities, the need for which has arisen directly as a result of the development. It would also help address the point made by the Town Council that existing cycle and pedestrian routes into the town from the points of access provided need to be augmented. The applicant is agreeable to this and should be secured by a s106 agreement.

9.139 With regards to the footpath links between the site and Beaconsfield Road, these are acceptable. However, the short paved link with the carriageway across the verge which is beyond the site will need to be secured as part of the s106 agreement through financial contributions to HCC Highways or through s278 procedures, to ensure that this can be provided.

9.140 It is stated that the existing footpath network will be supplemented by the addition of new

permissive footpaths within the site, the most notable being the footpath / cycle link which runs from Beaconsfield Road through the area of central green space to the western fields. The line of this route is shown on the various layout plans. However, the Rights of Way Officer has stated that permissive footpaths are a bad idea and can end up being revoked, so should be defined as of right. An upgrade to bridleway status to allow use by cyclists as of right, as well as pedestrians, together with appropriate surface materials has been agreed in principle by the applicant and should be secured through the s106 agreement. With regards to the final short paved link onto the carriageway across the verge near the A41 roundabout, which is beyond the site, this will need to be secured as part of the s106 agreement through financial contributions to HCC Highways or s278 procedures, to ensure that this can be provided.

9.141 With regards to the footpath from the existing to the proposed cemetery extension, this is shown on the layout plan and is acceptable in principle. It is anticipated that this would be offered for adoption and would therefore need to meet Herts Highways standards for adoption. However, with regards to the anticipated shared use of the immediate section accessing the existing cemetery by maintenance and funeral directors' vehicles, the Bereavement Services Manager has advised it would not be possible for such vehicles to travel through the existing area at Tring cemetery as there are occupied grave spaces that cannot be moved by law which bar the path of any roadway. He has agreed however that it would still be beneficial to include the footpath link to the cemetery.

9.142 In view of the above, the applicant has been advised that the extra width is redundant and that the site plan should be altered accordingly.

9.143 One apparent omission from Cala's plans is any proposal to provide the footpath link along Icknield Way on highway land between the northern spine road and Icknield Way Industrial Estate. This has also been noted by Herts Highways as a requirement. The Master Plan notes, given the narrow width of verge here, that this could either be north of the hedgerow or partly south through the land proposed for the employment development. If the latter this section would need to be designated if it falls outside the highway boundary and secured within the s106 agreement. The applicant has indicated that they are happy in principle to provide this piece of infrastructure. However, an update will be provided at the meeting following Herts Highways comments.

9.144 The Public Rights of Way Officer has said that significant gains for PRoW users need to be secured to mitigate for the loss of amenity provided by the current paths.

9.145 On balance, so far as the rights of way / footpath / cycleway proposals are concerned, subject to their provision and designation through the s106 mechanism, the proposals would meet the expectations within the Master Plan from a sustainable transport viewpoint and would accord with Policies CS8, 12, 29 and 35 and saved Policy 62 of the Local Plan.

#### Residential Amenities

9.146 It is not considered that the development would result in any significant harm to the amenity of neighbouring properties. There are currently no dwellings to the west of the proposed residential area which comprises open fields. To the north, Beeches Farm is located on the opposite side of Icknield Way and given the distance would not be directly impacted. To the south, Drayton Manor Lodge is located on the opposite side of Aylesbury Road and given the distance and tree screening would not be affected. There are no properties at Tring Cemetery other than Cemetery Lodge which is some 200 metres away, as are properties in Donkey Lane to the east. Properties abutting the eastern boundary of the site in its northern part at Icknield Industrial Estate comprise industrial and commercial premises which back onto the site and are unlikely to be adversely affected by the proposed residential or B1 employment uses.

9.147 There are residential properties at the western end of Beaconsfield Road that adjoin the eastern part of the site at Nos. 83, 86 and 88, and also at No. 10 Okeley Lane on the end of the terrace. However, these properties are on the opposite side of the road to the development which would front Beaconsfield Road so the relationship would not be considered detrimental to residential amenity. Moreover the nearest dwelling (Plot 39) is located more than 20 metres away which is consistent with the established front to front relationship in Beaconsfield Road. With regards to 10 Okeley Lane which has a side relationship to the site, it is noted that Plots 61-63 that would overlook its rear garden are located some 30 metres away, which is not considered to cause any material harm. A similar distance would be achieved in relation to the bungalow at 83 Beaconsfield Road and Plot 37.

9.148 The main properties that could be adversely affected by the development are residential properties that back onto the site at Okeley Lane. There was strong feedback from residents during public engagement preceding the preparation of the Master Plan about the lack of privacy and lack of landscaping between their homes and the new development. There was the suggestion of a wider gap, and green corridor, between the old and new properties. They were also concerned that access to the back of their properties would be cut off. In recognition of these points, the Master Plan states that the new housing backing onto the existing houses in Okeley Lane should have longer than normal back gardens, in order to respect the privacy of these properties.

9.149 Following concerns in response to the initially submitted plans that the proposals would result in overlooking and prevent residents being able to access the backs of their properties to which they had become accustomed, revised plans have been received which omit the three storey dwellings in favour of two storey and introduce a landscaped buffer strip in the form of a green track / footpath between the rear of Nos. 7 and 43 Okeley Lane and Plots 155, 157-167 that back onto these properties. This would effectively serve both existing and proposed dwellings.

9.150 The proposals would maintain a very generous 33-40 metre separation between the backs of existing and proposed dwellings, and include a 5-6 metre wide buffer strip that would be supplemented with additional tree planting in order to soften and screen views of the new housing from the backs of existing properties. This would be gated to ensure that it complies with secure by design requirements and so that residents of Okeley Lane will be able to access their back gardens from the west. While the previous layout did ensure adequate back to back distances in the context of the relevant 23 metre minimum guidance, CALA Homes have said that they are keen to respond to public comments where possible and therefore have made this change. Whilst being a slight compromise in secure by design terms, the proposals are considered acceptable from a residential amenity viewpoint and will have the advantage of a quieter more private rear aspect to the existing dwellings whilst psychologically appearing to be more separated from the new houses.

9.151 The rear boundary of proposed dwellings backing onto this buffer strip is indicated to be a post and rail fence. Whilst the reason for maintaining an open view is understood, there are concerns that this could appear unsightly as residents erect different types of enclosure and / or erect sheds and greenhouses. There would also be potential privacy concerns with open back gardens. In view of this, it would be recommended that final details of the landscaping and rear boundary enclosures / gates, together with the means of securing the buffer strip and to ensure a robust and visually acceptable design be secured pursuant to a landscaping condition. Removal of PD rights for the erection of means of enclosure to this area would be recommended. Subject to this the proposals are considered acceptable from a residential amenity viewpoint and would comply with Policy CS12.

9.152 With regards to the proposed dwellings, the layout reflects the minimum 23 metre back to back distance to ensure that appropriate residential amenity and privacy is achieved for most dwellings. Amendments were requested and it has been confirmed that the site plan has

been adjusted in relation to satisfying the minimum 23 m distance between plots 204/205 and 225. Height, spacing and orientation relationships would also ensure good standards of sunlight and daylight are achieved within the constraints of ensuring good urban design and layout.

9.153 The Council's Trees and Woodlands Officer has expressed concerns with the layout in respect of land to the rear of plots 155, 157-167 and to rear of plots 37, 40-54 and 1 and 10 wherein he has expressed concerns at leaving unsurvielled open spaces to the rear of properties and the potential for vandalism, dumping of household rubbish, garden waste and so forth.

9.154 We concur with these criticisms. However, the reason for the buffer zone to rear of Plots 155, 157-167 has been considered above and an on-balance decision made to accept the layout, subject to a more robust form of enclosure to the rear of these plots. The applicant has confirmed agreement to these changes. However, we would recommend that final details are pursued through the landscaping condition.

9.155 With regards to Plots 1 and 10, given that the gap is shorter / wider and will be more exposed to passing members of the public, the potential for encroachment / dumping of garden waste/household waste is not considered significant. The strip also falls outside the site and within DBC ownership.

9.156 With regards to Plots 37, 40-54, we would be concerned about how the 6 metre wide buffer strip between the backs of these properties and the cemetery wall would be managed and the high potential for this being enclosed into the gardens of these houses in future, and / or becoming a dumping ground / vandalism or harm to trees occurring. The Conservation Officer also feels that the heritage asset would benefit from being more visible to the public realm which it would not if it were enclosed. It is also considered that the siting of the refuse storage building at the western end of this buffer strip would block access from this end and result in further ambiguity as to the status of the buffer strip, leading to its likely enclosure in future. In view of the above, we consider that this buffer strip would be better provided as a public footpath through to Donkey Lane and the aforesaid building omitted. This would ensure the heritage asset remains more readily appreciated by being in the public realm and would mitigate the adverse effects noted by the Trees and Woodlands Officer. It is also considered that the rear boundary enclosure of the houses should be a more robust solid brick wall rather than fences which in time will fall into disrepair, be replaced with non-matching fences and appear unsightly, further detracting from the setting of the heritage asset. These concerns have been raised with the applicant and the principle of a footpath, substitution of a wall for the close boarded fencing, and resiting of the refuse storage building into the curtilage of the associated apartment block, has been agreed in principle with the applicant and an update will be provided at the meeting.

9.157 Subject to the above, the proposals are considered to accord with the guidance and principles within the LA5 Master Plan as well as Core Strategy Policies CS10, CS11, CS12 and CS13.

### Ecology

9.158 The application is supported by an Ecological Assessment Report by Ecology Solutions, supplemented by an Updated Phase 1 Survey and Site Walkover by Ethos.

9.159 The site does not fall within an ecological designation and many of the habitats on the site are of low intrinsic ecological interest. The limited loss of hedges is to be offset by new and supplementary planting.

9.160 In terms of presence of protected species, low potential for dormouse, reptiles and

amphibians is identified. There was no evidence of badgers on site. Following internal and external searches of buildings no evidence was found to suggest the presence of bats.

9.161 Based on the above, the following mitigation measures are incorporated in terms of Ecology:

- Supplementary planting of hedgerows and boundary tree planting;
- Planting of wildflowers within the western fields;
- Street planting within the site;
- Incorporation of native species within the planting schedule; and
- Preparation of an Ecological Mitigation and Enhancement Plan.

9.162 A condition is recommended to secure the latter.

9.163 The provision of sustainable drainage features and the landscaped open space within the development will also enhance the opportunities for ecological biodiversity on the site. Further details will be sought via a landscaping condition.

9.164 The Herts Ecology Officer considers the ecological assessments to be reliable. However, with regards to the Landscape Management Plan, he has raised a number of criticisms and considers that the landscape proposals should be reconsidered to provide greater ecological gain or if this is not acceptable or deliverable, offsite ecological enhancements, and that DBC should not determine the application until this issue is resolved.

9.165 Amended plans and details have been received in respect of the landscaping and its management strategy and the further comments of the Ecology Officer are awaited. An update will be provided at the meeting.

9.166 Subject to the above, it is considered that the proposals accord with Core Strategy policies CS26 and CS29, and saved Policies 99, 100, 101 and 102.

### Flood Risk

9.167 The site falls within Flood Zone 1 at minimal risk of fluvial flooding. However, due to the size of the site over 1 ha a flood risk assessment is necessary. In accordance with the Master Plan, the surface water drainage strategy is to incorporate appropriate sustainable drainage systems (SuDS) in order to minimise the risk of flooding as a result of the development.

9.168 The planning application is supported by a Flood Risk Assessment and Drainage Strategy (FRA) and Utility Assessment prepared by Woods Hardwick. As well as minimal risk of fluvial flooding, the site has also been assessed in terms of all other types of flooding within the FRA and it is concluded that the site is not at risk of flooding.

9.169 The drainage strategy proposed within the FRA has been developed in accordance with the hierarchy for sustainable surface water disposal. The proposal is to discharge surface water from the private areas of the site via a combination of traditional soakaways and permeably paved driveways and private drives. It is proposed that surface water runoff from the adoptable road network is drained via a series of ring soakaways located beneath infiltration basins. Both systems will work together and provide sufficient drainage for a 1 in 100 year (+40% for climate change) event. Four swales or retention basins are to be sited within the green corridor and secondary green corridors.

9.170 In terms of foul drainage this will drain via gravity to MH 3901 located within Aylesbury Road to the south east of the site. Tring is served by its own waste water treatment works, which has recently been upgraded. Thames Water have confirmed that there is capacity within their foul sewerage network to accommodate a gravity connection from the site.

9.171 The Lead Local Flood Authority raise no objection subject to the recommended compliance conditions, final details and a management plan. With regards to the outline scheme for which no details have been worked up, a pre-commencement condition requiring approval to details is recommended.

9.172 The Environment Agency has noted that as the site appears to be greenfield with little evidence of contamination from the perspective of groundwater quality it has no further requirements with respect to the residential development. With regards to the proposed employment area and cemetery extension, the EA note that both these activities have the potential to cause pollution and therefore conditions are recommended with regards to no infiltration without consent for the employment area and stipulated minimal distances from potable groundwater supplies, water courses, field drains and standing water with regards to any burials.

9.173 Subject to the above, the proposal would accord with the Utilities and Drainage Principles of the Master Plan, NPPF paragraphs 94, 100 and 103, as well as Core Strategy Policies CS29 and CS31.

### Noise

9.174 The proposed development would potentially be impacted adversely by existing road noise from the Icknield Way and Aylesbury Road and from commercial uses on the existing and proposed employment areas. NPPF Para 180 seeks to avoid noise giving rise to significant adverse impacts on health and the quality of life in considering new noise sensitive development.

9.175 The application is supported by an Environmental Noise Survey by Noise.co confirming that with appropriate mitigation the proposals would meet all relevant standards and requirements.

9.176 The measures outlined in Table 8 of the report including glazing, ventilation and the use of 1.8m close board acoustic fences. Furthermore, the applicant states that they would accept a planning condition limiting the noise impact of fixed plant within the proposed employment area.

9.177 The noise survey undertaken has confirmed that the noise generated by the existing commercial enterprises to the east of the site would have no adverse impact on housing proposed as part of this residential development.

9.178 The above said, the Environmental Health Officer has raised objections to a number of assumptions contained within the acoustic study which have not been properly evidenced or justified, viz:

- Professional Practice Guidance on Planning and Noise (2017), good design for residential.
- Principles appear not to have been properly considered.
- Longer period of monitoring than 24 hours would be expected.
- Omission of uncharacteristically high noise data without sound reasoning.
- No justification for adopting the simple *calculation method from BS8233:2014*
- Lack of consideration to LA<sub>max</sub> as required by ProPG 2017 guidance
- Lack of clarification as to which dwellings would exceed 55dBA<sub>eq,16hr</sub> in external amenity areas.
- In determining the cumulative rating level from industrial sources, the author has made significant assumptions without sound basis, viz no penalty for intermittency or impulsivity and/or other special characteristics made, e.g. HGV reversing beepers, fans, generators,

A/C, refuse collections, radios.

- The site technician names and competencies need to be provided

9.179 It is understood that the applicant's acoustic consultant is in liaison with the Environmental Health Department and an update will be provided at the meeting.

9.180 Subject to the above being satisfactorily resolved, and any suggested conditions, the proposals would accord with Core Strategy Policy CS32, and NPPF Para 180.

#### Sustainable Design and Construction

9.181 Any new development should be consistent with the principles of sustainable design as set out in Policies CS29, CS30 and CS31 of the Core Strategy.

9.182 The LA5 Master Plan states that the development must be brought forward based on a full recognition of the varying facets of sustainable development and minimising carbon emissions with particular attention to:

- Minimising the need to travel;
- Minimising pollution in all forms, including emissions and ground and surface water pollution and providing natural solutions to achieve this;
- Minimising energy use through design including considering the orientation of properties at a detailed stage in order to maximise passive solar gain;
- Protecting and enhancing biodiversity in layout and design;
- Using land use planning and design to improve health and well-being, for example, encouraging exercise by easy access to open space, to encourage healthy eating, and ensuring well-designed neighbourhoods that reduce crime and the fear of crime; and
- Integration of new communities with existing ones, maximising connectivity to shops and Tring Railway Station.

9.183 In response to these facets of sustainability the application is accompanied by a Sustainability Statement by JSP Ltd and a completed CS29 Sustainability Checklist in accordance with Policy CS29.

9.184 These reports identify key sustainable practices that would be incorporated into the design and construction of the development which will include:

- Materials selected against the BRE Green Guide achieving an average A rating.
- Pollution during construction minimised through adoption of various measures such as coverage of waste skips, just in time deliveries, early construction of hard surfaced roads, fuel and chemical storage on impervious bunded bases.
- Waste Management through adoption of a robust site waste management plan. Current data and performance suggests the Group is achieving a recycling rate in excess of 94%.
- Health and Wellbeing measures including recreation space; cycle storage; sufficient glazing to allow natural light to penetrate into the rooms; layout designed to ease travel for cyclists and pedestrians; and natural surveillance over public spaces.
- Water Efficiency through low flow sanitary ware and eco-sanitary products to achieve a water consumption rate calculated as 125 litres per person per day to comply with part G.
- CO2 Emissions to accord with Approved Document L that will achieve homes with an emission rate some 44% lower than comparable 2002 standards.
- Energy Efficiency Measures incorporated into the development to include energy efficient lighting, high efficiency white goods of A/A+, efficient boilers and energy efficient construction technologies.

- Timber to have FSC or CoC certification
- During construction, use of insulated on-site containers, appliances and apparatus to be energy efficient, self closing doors and compound lighting to be PIR
- U-values to better the minimum standards in Part L, conforming with standards to reduce heat loss at non-repeating thermal bridges, targeting low but comfortable air permeability
- Retention of trees, additional and supplementary tree planting to be undertaken using native species and to enhance biodiversity and support wildlife.
- Gravity-fed attenuation features to be designed and managed as natural seasonally wet areas with new wetland and damp grassland communities established around the attenuation ponds to help diversify the site's habitats.
- Use of permeable paving in private areas of hardstanding with adoptable highways draining to soakaways and infiltration basins.
- Use of permeable paving that will be lighter coloured.
- Adoption of a Green Travel Plan with TravelPlan Co-Ordinator.
- Principal living spaces to benefit from natural sunlight and solar gain with generous glazing provision.

9.185 The Town Council and Tring in Transition has said that an opportunity is being missed to achieve a higher level of energy efficiency throughout the site e.g. use of solar panels, higher levels of insulation and provision for electric cars. This is noted. However, the site is sensitive from a landscape perspective and could result in harm to the natural beauty of the AONB from solar panels. Whilst PD rights exist, inconsiderate installation of solar panels could cause harm to the character and appearance of the development. It is therefore considered expedient to remove PD rights for solar panels and consider these on an individual basis. With regards to the employment area, the proposed illustrative layout indicates that it would be possible to include solar panels on the roofs without significant visual harm given the orientation of the roof pitches and the siting adjacent to existing industrial uses that would help conceal significant views.

9.186 Further information is sought regarding whole life cycle and future proofing of the buildings within the CS29 Checklist as this is missing. EV charging points would be recommended at the rate of 20% active / 20% passive to be secured by condition. Confirmation from the applicant has been sought and an update will be provided at the meeting. Subject to this, the submission, whilst not going significantly beyond building regulations standards, is considered nevertheless to satisfactorily demonstrate that the sustainability principles of the Core Strategy as expressed through Policy CS29 would be met. Furthermore, with the proposals for significant provision of open space and tree planting, and proposals to upgrade and provide new footpath and cycling facilities which will improve access to the town centre and other facilities by means other than private vehicles, together with the other significant social and infrastructure benefits to be secured through the s106 agreement, the proposals are considered to accord with the sustainability principles of the Master Plan together with the wider aim within the NPPF of contributing to the achievement of sustainable development through the three overarching objectives - economic, social and environmental.

9.187 A condition to require compliance with the sustainability statement and checklist would be recommended.

#### Infrastructure, CIL and Planning Obligations

9.188 Policy CS35 requires all developments to make appropriate contributions towards infrastructure required to support the development. These contributions will normally extend only to the payment of CIL where applicable. The Council's Community Infrastructure Levy (CIL) was adopted in February 2015 and came into force on the 1st July 2015. This application is CIL Liable.

9.189 The Charging Schedule clarifies that the site is in Zone 2 within which a charge of £150 per square metre is applicable to this development. No charge is sought for commercial development. The CIL is calculated on the basis of the net increase in internal floor area. CIL relief is available for affordable housing, charities and Self Builders and may be claimed using the appropriate forms.

9.190 The published Regulation 123 list sets out the list of infrastructure projects that may benefit from CIL funding. The purpose of the list is to differentiate between those types of infrastructure that the authority intends to fund through CIL and those areas where a planning obligation under S.106 of the Town and Country Planning Act 1990 (as amended) or another source of funding may be pursued to deliver the relevant infrastructure item. In accordance with Regulation 123 of the Community Infrastructure Regulations 2010 (as amended), developer contributions to the projects listed will not be sought through planning obligations under S.106 of the Town and Country Planning Act 1990 (as amended). The government is currently consulting on new legislation that would include the scrapping of the regulation 123 list, which, if successful would mean that there are no restrictions on who can have S106 and/or CIL funding.

9.191 The Regulation 123 list outlines that CIL contributions will go towards a range of education, health, community facilities and strategic transport proposals.

9.192 The Utility Assessment report produced by Wood Hardwick confirms that there is no apparatus crossing the site itself, there is however apparatus located within the surrounding highway network and it is therefore important that due care is taken during construction with particular regard to the site accesses and the proposed pedestrian links. The report confirms that connections are available for gas, electric, water, sewerage and telecommunications to serve the development.

9.193 The level of development proposed in Tring by the Core Strategy (i.e. around 480 homes between 2006 and 2031) was accepted by the County Council in terms of service issues during the preparation of the Master Plan. Primary schools within the town can accommodate the estimated increase in pupil yields through latent capacity, by expanding Dundale and Grove Road schools. In terms of secondary provision, Tring School currently has eight forms of entry. There is scope to expand the school to ten forms of entry if detached playing fields are provided. However, the County Council's preference is for the school to remain at its current size.

9.194 Herts Property Services have in response to the application confirmed that as the development does not fall within any of the CIL Reg 123 exclusions, it does not wish to request any financial contributions, but reserves the right to seek Community Infrastructure Levy contributions towards the provision of infrastructure as outlined in the Reg 123 List through the appropriate channels.

9.195 The Herts Valleys Clinical Commissioning Group confirmed during the preparation of the Master Plan that there was sufficient capacity at the doctors' surgeries in Western Road and the town centre to meet demand arising from the anticipated level of development in Tring, including LA5. However, the Herts Valley Clinical Commissioning Group has made enquiries in response to this application with regards to seeking s106 funding for increasing capacity at a local GP surgery in Tring. However, the Infrastructure and Project Delivery Officer has confirmed that as a local GP surgery would come under "new GP facilities" in the 123 list, they would not be able to bid for money through the s106 process.

9.196 The number of new homes proposed on LA5 is not high enough to justify the inclusion of any shops on the site. It is envisaged that LA5 residents will use existing shopping facilities in Tring, including the Western Road local centre and the town centre, for their day to day shopping requirements.

9.197 Herts Fire and Rescue has stated that All developments must be adequately served by fire hydrants in the event of fire. The County Council as the Statutory Fire Authority has a duty to ensure fire fighting facilities are provided on new developments. HCC therefore seek the provision of hydrants required to serve the proposed buildings by the developer through standard clauses set out in a Section 106 legal agreement or unilateral undertaking. This is considered acceptable and has been justified against the standard CIL tests at para. 204 of the NPPF.

9.198 Some stress has been identified by Thames Water in their response in relation to water supplies with an inability of the infrastructure to accommodate the needs of the development. A condition is therefore recommended by Thames Water in relation to network upgrades.

9.199 A s.106 agreement is recommended to secure inter alia, affordable housing, public open space, land for cemetery use, car park, diversion of public right of way, provision of footpaths / cycle paths, travel plan and monitoring contributions, contributions to sustainable transport including footways along Icknield Way and Aylesbury Road, and fire hydrants as follows:

- 40% Affordable housing with 75% affordable rent 75% and 25% shared ownership
- Provision and transfer to DBC of 6.76 ha of public open space including LAP, NEAP and Green Corridor as indicated on plan
- Provision of maintenance contributions for the ongoing upkeep of the transferred POS, including LAP and NEAP
- Provision and transfer to DBC of 1.7 ha of land for extension to Tring Cemetery as indicated on plan
- Provision and transfer to DBC of a 30 space car park and toilet block serving the new cemetery extension as indicated on plan
- Diversion of PROW 48a
- Provision of the footpath/cycle routes together with surface improvements to HCC Rights of Way specifications and redesignations, as appropriate (e.g. bridleway)
- S278 agreement, or contributions to HCC, to secure completion of the footpath / cycle links to offsite highway infrastructure at Beaconsfield Road and A41 roundabout
- Financial contribution to DBC / HCC of £34,000 for upgrading surface of Donkey Lane and redesignation as restricted highway
- Financial contribution to HCC of £8,000 towards sustainable transport comprising easy access kerbing and shelters at stops on Aylesbury Road
- Financial contribution to HCC for footway provision on Aylesbury Road and Icknield Way and other measures (such as central refuge), to ensure residents can safely access bus stops from the development
- Provision and designation / transfer (whichever is appropriate mechanism) to HCC of footpath on Icknield Way (within employment land area) as considered necessary as an alternative to financial contribution to HCC for provision within the highway

- Financial contribution to HCC of £6,000 towards Travel Plan monitoring costs
- Provision of fire hydrants

9.200 These have been agreed in principle and a draft s106 prepared. The requests are considered to meet the planning obligations tests at paragraph 204 of the NPPF.

9.201 As highway comments on amended plans and details are still awaited, the above list may not be exhaustive and could be amended.

9.202 Subject to the above and final agreement with respect to the details in particular of footpaths /cycle paths and designations, the proposal would comply with CS35 of the Core Strategy and saved Policy 13 of the Local Plan.

#### Other Material Planning Considerations

9.203 Waste and recycling - The HCC Minerals and Waste Officer has recommended that waste arising from the development process be used and disposed of sustainably in accordance with HCC policies. The Sustainability checklist confirms that a SWMP will be produced. However, it is recommended that specific details be secured by condition.

9.204 Contamination – The Scientific Officer has reviewed the submitted Phase 1 Geo – Environmental Desk Study Report and Geo – Environmental Site Investigation Report prepared by BRD and raises no objection to the proposed development on grounds of land contamination. He also raises no objection on grounds of air quality. Planning conditions and informatives are recommended with regards to submission of a construction management plan, air quality assessment, energy source emission standards, and unexpected contamination.

9.205 Secure by Design - The Design Out Crime Officer has asked that the applicants build the entire development to the preferred police minimum security standard Secured by Design (SBD). It is noted that SBD housing developments suffer at least 50% less burglary, 25% less vehicle crime and 25% less criminal damage. It would be recommended that this be secured by condition.

9.206 PD - To protect residential amenity and the design / appearance of the dwellings where inconsiderate extensions may harm the character of the development / setting of AONB, it would be considered expedient to remove permitted development rights to certain plots in relation to roof additions, extensions and outbuildings, and also in some cases means of enclosure.

## **10. Conclusions**

10.1 The proposed development for residential and employment uses is in accordance with Local Allocation LA5 as referenced within the Council's Core Strategy and Site Allocations DPD. Except as noted in the report, the proposal would comply with the key principles of the LA5 Master Plan and includes significant planning benefits, including provision of public open space and cemetery use, that would be secured by s106 agreement. The proposals would make a significant and much needed contribution to meeting housing requirements in the Borough as expressed through Core Strategy Policy CS17 and the increase as anticipated within the emerging Dacorum Single Local Plan. Whilst there would be a low level of harm to the AONB, This harm is considered to be more than offset by the benefits associated with the delivery of an allocation within the Core Strategy and Site Allocations DPD in order to meet the housing requirement, employment strategy and wider objectives set out in these documents. The proposal is therefore recommended for delegated approval subject to resolving the outstanding issues noted in the report, including the completion of a s106 agreement.

**11. RECOMMENDATION** – That planning permission be **DELEGATED WITH A VIEW TO APPROVAL** for the reasons referred to above and subject to the following conditions:

Conditions – Full Application

No	Condition
1	<p>The development the subject of full details 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 in relation to the full element of the permission shall take place until a Phasing Plan in relation to that element shall have been submitted to and approved in writing by the local planning authority.</p> <p>Reason: For the avoidance of doubt and to ensure that the conditions are discharged separately in relation to the outline and full elements of the permission.</p>
3	<p>No development in relation to the full element of the permission (other than demolition, site preparation, groundworks, site investigation and remediation) shall take place within an agreed phase (under Condition 2) until samples and / or details of the materials to be used in the construction of the external walls and roofs of the development hereby permitted shall have been submitted to and approved in writing by the local planning authority. Sample panels of the materials for the dwellings and boundary walls should be constructed on site to agree the final brick, mortar, flintwork, tiles/ slates and landscaping materials. 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 Dacorum Core Strategy (September 2013).</p>
4	<p>Notwithstanding any details submitted, no development in relation to the full element of the permission (other than demolition, site preparation, groundworks, site investigation and remediation) shall take place until details of the following to be used in the construction of the development hereby permitted shall have been submitted to and approved in writing by the local planning authority:</p> <p>1:20 details of all windows and doors (including finished colour and materials, and vertical cross sections through the openings)</p> <p>1:20 details of all eaves cross sections, bargeboards and fascias (including finished colour and materials)</p> <p>1:100 details of means of enclosure in relation to both closing ends of the buffer strip to rear of Plots 155 and 157-167 and details of how its access / security shall be managed</p> <p>Details of rainwater goods</p> <p>Details of any external flues, gas pipes, vents, extracts, metre cupboards</p> <p>Development shall be carried out in accordance with the approved details.</p> <p>Reason: To ensure a satisfactory appearance to the development and in the interest of Secured by Design objectives in accordance with Policy CS12 and 27 of the Dacorum Core Strategy (September 2013) and saved Policy 97 of the Dacorum Borough Local Plan 1991-2011.</p>
5	<p>The chimneys shown on the approved plans in relation to the full element of the permission shall be constructed as a necessary and integral part of the development.</p> <p>Reason: For the avoidance of doubt and to ensure a satisfactory appearance to the development in accordance with Policy CS12 of the Dacorum Core Strategy</p>

	September 2013.
6	<p>Prior to the commencement of any part (full or outline) of the development (including demolition works), the trees shown for retention on the approved Tree Protection Plan EDP 1 and EDP 1 (Sheets 1 to 4) contained within the Arboricultural Impact Assessment (Incorporating Arboricultural Method Statement and Tree Protection Measures) edp4539_r004c, Jan 2019, prepared by EDP shall be protected during the whole period of site demolition, excavation and construction in accordance with details contained therein. The tree protection measures shall be retained in place, shall not be moved and no materials, plant, soil or spoil shall be stored within the area so protected.</p> <p>Reason: In order to ensure that damage does not occur to the trees during demolition works and building operations in accordance with Policy CS12 of the Dacorum Core Strategy September 2013 and saved Policy 99 of the Dacorum Borough Local Plan 1991-2011. The details are required before commencement of development for if they are deferred until after the development has begun, demolition and buildings works would potentially result in harm to the health and survival of trees to the detriment of the visual amenities of the development and area.</p>
7	<p>Notwithstanding any details submitted, no development in respect of the full element of the permission (other than demolition, site preparation, groundworks, site investigation and remediation) shall take place within an agreed phase (under Condition 2) until full details of both hard and soft landscape works for that phase shall have been submitted to and approved in writing by the local planning authority. These details shall include:</p> <p>hard surfacing materials;  means of enclosure;  soft landscape works which shall include planting plans (including replacement tree planting); 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;  proposed finished levels or contours;  biodiversity enhancement measures;  external lighting including any street lighting;  minor artefacts and structures (e.g. furniture, storage units, signs etc.);  proposed and existing functional services above and below ground (e.g. drainage, power, communications cables, pipelines etc, indicating lines, manholes, supports etc.);  on-going management and maintenance plan for the hard and soft landscaping.</p> <p>The approved landscape works shall be carried out prior to the first occupation of any part of the phase to which it relates. Any tree or shrub which forms part of the approved landscaping scheme which within a period of five years from planting fails to become established, becomes seriously damaged or diseased, dies or for any reason is removed shall be replaced in the next planting season by a tree or shrub of a species, size and maturity to be approved by the local planning authority and maintained until satisfactorily established.</p> <p>Reason: To ensure a safe and satisfactory appearance to the development and to safeguard the visual character of the immediate area in accordance with Policies CS12, CS13 and CS29 of the Dacorum Core Strategy (September 2013) and Policies 99, 100 and 129 of the Dacorum Borough Local Plan 1991-2011.</p>
8	<p>The development hereby permitted in relation to the full element of the permission shall be carried out in accordance with the submitted and approved Sustainability Statement and CS29 Sustainability Checklist.</p>

	Reason: To ensure the sustainable development of the site in accordance with Policy CS29 of the Dacorum Core Strategy September 2013.
9	<p>No development in relation to the full element of the permission (other than demolition, site preparation, site investigation and remediation) shall take place within an agreed phase (under Condition 2) until details of the proposed slab, finished floor and ridge levels of the buildings in relation to the existing and proposed levels of the site and the surrounding land shall have been submitted to and approved in writing by the local planning authority. The buildings shall be constructed in accordance with the approved levels.</p> <p>Reason: For the avoidance of doubt and in the interest of residential amenities and to ensure a satisfactory form of development in accordance with Policies CS11, 12 and 13 of the Dacorum Core Strategy September 2013.</p>
10	<p>No external lighting in relation to the full element of the permission (including street lighting) shall be installed within an agreed phase (under Condition 2) until a detailed lighting scheme and statement for that phase shall have been submitted to and approved in writing by the local planning authority. The details submitted shall have regard to the criteria and guidance within Saved Appendix 8 of the Dacorum Borough Local Plan 1991-2011 in order to minimise the impact of lighting on the surrounding AONB. Development shall be carried out in accordance with the details approved.</p> <p>Reason: To comply with paragraph 180 of the National Planning Policy Framework (2018) and Appendix 8 of the Dacorum Borough Local Plan 1991-2011 as the lighting at this location adjacent to and within the Chilterns AONB should be designed to minimise problems of glare and unnecessary light pollution by ensuring that the level of luminance is appropriate for the location, is sustainable and efficient, and protect the natural beauty of the AONB.</p>
11	<p>No development in relation to the full element of the permission shall take place until a Construction Management Plan shall have been submitted to and approved in writing by the local planning authority. The plan should consider all phases of the development. The statement shall provide for:</p> <ol style="list-style-type: none"> <li>1. Construction vehicle numbers, type, routing</li> <li>2. Traffic management requirements</li> <li>3. Construction and storage compounds (including areas designated for car parking)</li> <li>4. Siting and details of wheel washing facilities</li> <li>5. Cleaning of site entrances, site tracks and the adjacent public highway</li> <li>6. Timing of construction activities to avoid school pick up/drop off times</li> <li>7. Provision of sufficient on-site parking prior to commencement of construction activities</li> <li>8. Post construction restoration/reinstatement of the working areas and temporary access to the public highway.</li> </ol> <p>The details shall include a plan showing the proposed location of these areas. The approved statement shall be adhered to throughout the construction period.</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 and saved Policy 51 of the Dacorum Borough Local Plan 1991-2011. The details are required before commencement of development as it is necessary to ensure that the measures are planned and in place to deal with the matters listed.(Contact: Highways and Environmental Health)</p>
12	No development in relation to the full element of the permission hereby permitted shall be occupied within an agreed phase (under Condition 2) until the proposed access and turning areas shall have been laid out, demarcated, levelled, surfaced and drained in accordance with the approved plans and retained thereafter available for

that specific use. On-site car parking / cycle storage shall be provided to serve the dwelling it serves before occupation of the dwelling concerned, or in the case of the flats, shall be provided before occupation of any of the flats in the block concerned. The parking bays shall comply with the following minimum dimensions

Hardstandings	2.5 m x 5 m with 150mm buffer either side when situated between buildings
Single bays between flank walls	3.4 m minimum width
Double bays between flank walls	6 m minimum overall width
Single garages counting as parking spaces	3.25 m x 6m clear internal dimensions

Arrangements shall be made for surface water drainage to be intercepted and disposed of separately so that it does not discharge from or onto the highway carriageway.

Reason: To ensure satisfactory access into the site and avoid carriage of extraneous material or surface water from or onto the highway and to ensure satisfactory parking provision in order to avoid harm to highway safety in accordance with Policy CS12 of the Dacorum Core Strategy September 2013 and saved Policies 51, 54 and 58 of the Dacorum Borough Local Plan 1991-2011.

13 The development in relation to the full element of this permission shall be carried out in accordance with the approved Flood Risk Assessment and Drainage Strategy by Woods Hardwick Infrastructure LLP reference 17918/FRA dated August 2018 and the following mitigation measures:

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 + 40% climate change event.
2. Implementing appropriate drainage strategy to permeable paving, infiltration basin and soakaways as indicated on the Drainage layout drawings 17918-TRIN-5-200-D and 17918-TRIN-5-201-D

Reason: To reduce the risk of flooding to the proposed development and future occupants in accordance with Policy CS31 of the Dacorum Core Strategy September 2013.

14 No development in relation to the full element of the permission (other than demolition, site preparation, site investigation and remediation) shall take place until the final design of the drainage scheme shall have been submitted to, and approved in writing by, the local planning authority. The surface water drainage system shall be based on the submitted Flood Risk Assessment and Drainage Strategy by Woods Hardwick Infrastructure LLP reference 17918/FRA dated August 2018. The scheme shall also include;

1. Detailed engineered drawings of the proposed SuDS features including their, location, size, volume, depth and any inlet and outlet features including any connecting pipe runs and all corresponding calculations/modelling to ensure the scheme caters for all rainfall events up to and including the 1 in 100 year + 40% allowance climate change event. 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.
2. 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>3. Details of final exceedance routes, including those for an event which exceeds to 1:100 + cc rainfall event.</p> <p>The approved scheme shall be completed before the development is first occupied.</p> <p>Reason: To reduce the risk of flooding to the proposed development, future occupants and surrounding area in accordance with Policy CS31 of the Dacorum Core Strategy September 2013.</p>
15	<p>Prior to first occupation of any part of the full element of the permission, a management and maintenance plan for the SuDS features and drainage network shall have been submitted to and approved in writing by the Local Planning Authority. The scheme shall include maintenance and operational activities; arrangements for adoption and any other measures to secure the operation of the scheme throughout its lifetime. The scheme shall subsequently be managed and maintained in accordance with the details approved.</p> <p>Reason: To ensure the on-going upkeep and maintenance of the drainage scheme in order to reduce the risk of flooding to the proposed development and future occupants in accordance with Policy CS31 of the Dacorum Core Strategy September 2013.</p>
16	<p>No demolition or groundworks shall take place in relation to the full element of the permission until details of measures to recycle and reduce demolition and construction waste which may otherwise go to landfill, shall have been submitted to and approved in writing by the local planning authority. The measures shall be implemented in accordance with the approved details.</p> <p>Reason: To accord with the waste planning policies of the area, Policy CS29 of the Dacorum Core Strategy (September 2013), saved Policy 129 of the Dacorum Borough Local Plan 1991-2011 and Policies 1, 2 and 12 of the Hertfordshire County Council Waste Core Strategy and Development Management Policies Development Plan Document 2012 which forms part of the Development Plan.</p>
17	<p>No development in relation to the full element of the permission (other than demolition, site preparation, groundworks, site investigation and remediation) shall take place until an air quality report assessing the impacts of the proposed development on the surrounding environment and uses shall have been submitted to and approved in writing by the Local Planning Authority. The source of energy for the homes, amongst other pollutant aspects of the proposed development, must be considered within the report. The report shall indicate areas where there are, or are 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>Reason: The site is within 0.8 – 1.6 miles of two passive monitoring locations of which the previous and current NO2 concentration is close to the AQ objective; the size of the proposed development and number of car parking spaces would indicate that the amenities of neighbouring premises should be protected from impacts on air quality arising from the development in accordance with Policies CS8 and CS32 of the Core Strategy (2013) and having regard to the Environment Act 1995, Air Quality Regulations and subsequent guidance.</p>
18	<p>The development in relation to the full permission shall not be occupied until details of the crime prevention measures to be incorporated into the development in order to meet Secured by Design part 2 certification shall have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the measures approved which shall thereafter be retained and adequately maintained at all times.</p> <p>Reason: To ensure a secure and safe form of development for the residents in</p>

	<p>accordance with Policies CS11 and 12 of the Dacorum Core Strategy September 2013. Building to the physical security of Secured by Design, which is the police approved minimum security standard, will reduce the potential for burglary by 50% to 75%. SBD housing developments suffer at least 50% less burglary, 25% less vehicle crime and 25% less criminal damage.</p>
19	<p>A. No development in relation to the full element of the permission shall take place until a Written Scheme of Investigation has been submitted to and approved in writing by the local planning authority. The scheme shall include an assessment of significance and research questions; and</p> <ol style="list-style-type: none"> <li>1. The programme and methodology of site investigation and recording</li> <li>2. The programme and methodology of site investigation and recording as suggested by the evaluation</li> <li>3. The programme for post investigation assessment</li> <li>4. Provision to be made for analysis of the site investigation and recording</li> <li>4. Provision to be made for publication and dissemination of the analysis and records of the site investigation</li> <li>4. Provision to be made for archive deposition of the analysis and records of the site investigation</li> <li>5. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.</li> </ol> <p>Development shall take place in accordance with the approved Written Scheme of Investigation.</p> <p>B. The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation and the provision made for analysis, publication and dissemination of results and archive deposition under points 3, 4 and 5 above has been secured.</p> <p>Reason: To ensure that reasonable facilities are made available to record archaeological evidence in accordance with Policy CS27 of the Dacorum Core Strategy September 2013 and saved Policy 118 of the Dacorum Borough Local Plan 1991-2011. The details are required before commencement of development as if they are deferred until after the development has begun, the opportunity for a proper archaeological investigation will have been missed.</p>
20	<p>Should the development in relation to the full element of the permission have CHP or biomass boilers, no such boilers shall be installed until details shall have been submitted to and approved in writing by the local planning authority in relation to the following matters:</p> <ol style="list-style-type: none"> <li>a. Evidence to demonstrate compliance with 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.</li> <li>b. Details of the boilers / stacks which shall have dry NOx emissions not exceeding 40 mg/kWh (0%).</li> <li>c. Details to demonstrate that the CHP will have a discharge stack which is at least 3m above any openable windows or ventilation air inlets within a distance of 5Um.</li> </ol> <p>Reason: To ensure an acceptable appearance and that the amenities of the neighbouring premises are protected from increased air quality arising from the development in accordance with Policies CS8, CS12 and CS32 of the Dacorum Core Strategy (2013).</p>

21	<p>No properties in relation to the full element of the permission shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to/from the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.</p> <p>Reason: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.</p>
22	<p>Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any Order amending or re-enacting that Order with or without modification) no development falling within the following classes of the Order shall be carried out without the prior written approval of the local planning authority:</p> <p>Schedule 2 Part 1 Classes A and E (Plots 5-11, 18-20, 25, 27, 28, 31-34, 37-39, 55, 57, 60-63, 66, 69, 73-76, 81, 83, 85, 99-102, 107, 111-113, 120, 123, 125, 130-133, 135, 141-144, 149-152, 154-156, 166, 167, 185, 191-193, 197, 200, 202, 209, 226)</p> <p>Schedule 2 Part 1 Class B (all plots other than 157-165)</p> <p>Schedule 2 Part 14 Class A (all plots)</p> <p>Reason: To enable the local planning authority to retain control over the development in the interests of safeguarding the residential and visual amenity of the locality, the character of the development, and the setting of the adjoining AONB, in accordance with Policy CS12 and CS27 of the Dacorum Core Strategy September 2013 and saved Policy 97 of the Dacorum Borough Local Plan 1991-2011.</p>
23	<p>Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (Amendment) (No.2) (England) Order 2008 (or any Order revoking or re-enacting that Order) (with or without modification) the garages hereby permitted shall be kept available at all times for the parking of vehicles associated with the residential occupation of the dwellings and they shall not be converted or adapted to form living accommodation.</p> <p>Reason: To ensure the availability of off-street parking in the interests of highway safety and visual amenity and in compliance with Policies CS10, 11, 12 of the Dacorum Core Strategy September 2013 and saved Policies 51 and 58 of the Dacorum Borough Local Plan 1991-2011.</p>
Conditions – Outline Application	
24	<p>Approval of the details of the appearance, landscaping, layout and scale of the development in relation to the outline permission hereby permitted (hereinafter called "the reserved matters") shall be obtained from the local planning authority in writing before any development in relation to an agreed phase (under Condition 27) of the outline permission is commenced.</p> <p>Reason: To comply with the provisions of Section 92 (2) of the Town and Country Planning Act 1990.</p>
25	<p>Application for approval of the reserved matters shall be made to the local planning authority before the expiration of three years from the date of this permission.</p> <p>Reason: To comply with the provisions of Section 92 (2) of the Town and Country Planning Act 1990.</p>

26	<p>The development the subject of outline details hereby permitted shall be begun either before the expiration of three years from the date of this permission, or before the expiration of two years from the date of the approval of the last of the reserved matters to be approved.</p> <p>Reason: To prevent the accumulation of planning permission; to enable the Council to review the suitability of the development in the light of altered circumstances and to comply with the provisions of Section 92 (2) of the Town and Country Planning Act 1990.</p>
27	<p>No development in relation to the outline element of the permission shall take place until a Phasing Plan in relation to that element shall have been submitted to and approved in writing by the local planning authority.</p> <p>Reason: For the avoidance of doubt and to ensure that the conditions are discharged separately in relation to the outline and full elements of the permission.</p>
28	<p>No development in respect of the outline permission (other than site preparation, groundworks, site investigation and remediation) shall take place within an agreed phase (under Condition 27) until samples and / or details of the materials to be used in the construction of the external walls and roofs of the development 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. Please do not send materials to the council offices. Materials should be kept on site and arrangements made with the planning officer for inspection.</p> <p>Reason: To ensure a satisfactory appearance to the development in accordance with Policy CS12 of the Dacorum Core Strategy (September 2013).</p>
29	<p>The details of landscaping to be submitted for the approval of the local planning authority in accordance with Condition (24) above shall include:</p> <p>hard surfacing materials;  means of enclosure;  soft landscape works which shall include planting plans (including replacement tree planting); 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;  proposed finished levels or contours;  biodiversity enhancement measures;  external lighting including any street lighting;  minor artefacts and structures (e.g. furniture, storage units, signs etc.);  proposed and existing functional services above and below ground (e.g. drainage, power, communications cables, pipelines etc, indicating lines, manholes, supports etc.);  on-going management and maintenance plan for the hard and soft landscaping.</p> <p>The approved landscape works within an agreed phase (under Condition 27) shall be carried out prior to the first occupation of any part of that phase of the outline scheme hereby permitted. Any tree or shrub which forms part of the approved landscaping scheme which within a period of five years from planting fails to become established, becomes seriously damaged or diseased, dies or for any reason is removed shall be replaced in the next planting season by a tree or shrub of a species, size and maturity to be approved by the local planning authority and maintained until satisfactorily established.</p> <p>Reason: To ensure a safe and satisfactory appearance to the development and to safeguard the visual character of the immediate area in accordance with Policies CS12, CS13 and CS29 of the Dacorum Core Strategy (September 2013) and Policies 99, 100 and 129 of the Dacorum Borough Local Plan 1991-2011.</p>

30	<p>No development in relation to the outline element of the permission shall take place within an agreed phase (under Condition 27) until a sustainability statement in relation to that phase, that demonstrates how the criteria within Policy CS29 of the Dacorum Core Strategy (as may be amended by the council's Sustainable Development Advice Note) will be satisfied, shall have been submitted to and approved in writing by the local planning authority. The statement shall be submitted for approval concurrently with the first of the reserved matters to be submitted. The development shall be carried out in accordance with the details approved.</p> <p>Reason: To ensure the sustainable development of the site in accordance with the aims of Policy CS29 and the principles set down in chapter 18 of the Dacorum Core Strategy September 2013 and the Sustainable Development Advice Note which is available to download from the Council's website. The details are required before commencement of development for if they are deferred until after the development has begun, the design will already have been agreed and finalised, and the materials potentially ordered and used, thereby limiting the available options for designing in sustainability measures.</p>
31	<p>The details of scale to be submitted for the approval of the local planning authority in accordance with Condition (40) above shall include details of the proposed slab, finished floor and ridge levels of the buildings in relation to the existing and proposed levels of the site and the surrounding land and buildings. The development within an agreed phase (under Condition 27) shall be constructed in accordance with the approved levels.</p> <p>Reason: For the avoidance of doubt and in the interest of residential amenities and to ensure a satisfactory form of development in accordance with Policies CS11, 12 and 13 of the Dacorum Core Strategy September 2013.</p>
32	<p>No external lighting in relation to the outline element of the permission (including street lighting) within an agreed phase (under Condition 27) shall be installed until a detailed lighting scheme in relation to that phase shall have been submitted to and approved in writing by the local planning authority. The details submitted shall have regard to the criteria and guidance within Appendix 8 of the Dacorum Borough Local Plan 1991-2011 in order to minimise the impact of lighting on the surrounding AONB. Development shall be carried out in accordance with the details approved.</p> <p>Reason: To comply with paragraph 180 of the National Planning Policy Framework (2018) and Appendix 8 of the Dacorum Borough Local Plan 1991-2011 as the lighting at this location adjacent to and within the Chilterns AONB should be designed to minimise problems of glare and unnecessary light pollution by ensuring that the level of luminance is appropriate for the location, is sustainable and efficient, and protect the natural beauty of the AONB.</p>
33	<p>No development in relation to the outline element of the permission within an agreed phase (under Condition 27) shall take place until a Construction Management Plan for that phase shall have been submitted to and approved in writing by the local planning authority. The plan should consider all phases of the development. The statement shall provide for:</p> <ol style="list-style-type: none"> <li>1. Construction vehicle numbers, type, routing</li> <li>2. Traffic management requirements</li> <li>3. Construction and storage compounds (including areas designated for car parking)</li> <li>4. Siting and details of wheel washing facilities</li> <li>5. Cleaning of site entrances, site tracks and the adjacent public highway</li> <li>6. Timing of construction activities to avoid school pick up/drop off times</li> <li>7. Provision of sufficient on-site parking prior to commencement of construction activities</li> </ol>

	<p>8. Post construction restoration/reinstatement of the working areas and temporary access to the public highway.</p> <p>The details shall include a plan showing the proposed location of these areas. The approved statement shall be adhered to throughout the construction period of the relevant phase (under Condition 27).</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 and saved Policy 51 of the Dacorum Borough Local Plan 1991-2011. The details are required before commencement of development as it is necessary to ensure that the measures are planned and in place to deal with the matters listed.(Contact: Highways and Environmental Health)</p>
34	<p>The development in relation to any agreed phase (under Condition 27) of the outline element of the permission shall not be occupied until the accesses approved as part of this permission, and car parking and turning areas approved under Condition (24) above shall have been constructed in relation to that phase. The access, car parking and turning areas so provided shall be maintained as a permanent ancillary to the development and they shall not be used thereafter otherwise than for the purposes approved.</p> <p>Reason: To ensure that adequate parking is provided at all times so that the development does not prejudice or cause obstruction to pedestrian or vehicular traffic on the adjoining road, or cause harm to the residential and visual amenities of the area in accordance with Policy CS12 of the Dacorum Core Strategy September 2013.</p>
35	<p>No development in relation to the outline element of the permission (other than site preparation, site investigation and remediation) within an agreed phase (under Condition 27) shall take place until a surface water drainage scheme for that phase, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, shall have been submitted to and approved in writing by the local planning authority. The drainage strategy should demonstrate that surface water run-off generated up to and including the 100 year plus climate change critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event. The scheme shall also include:</p> <ol style="list-style-type: none"> <li>1. Limiting the surface water run-off generated by the 1 in 100 year + climate change critical storm so that it will not exceed the run-off from the undeveloped site and not increase the risk of flooding off-site.</li> <li>2. 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>3. Implementing the appropriate drainage strategy based on infiltration, using appropriate above SuDS measures.</li> <li>4. Detailed surface water calculations and modelling for all rainfall events up to and including the 1 in 100 year + 40% climate change event.</li> <li>5. Details of how the scheme shall be maintained and managed after completion.</li> <li>6. Detailed engineered drawings of the proposed SuDS measures</li> </ol> <p>The approved scheme for the relevant phase shall be completed before the first occupation of that phase and shall subsequently be managed and maintained in accordance with the details approved.</p> <p>Reason: To reduce the risk of flooding to the proposed development, future occupants and the surrounding area in accordance with Policy CS31 of the Dacorum Core Strategy September 2013.</p>
36	<p>In relation to the outline element of the permission, no infiltration of surface water drainage into the ground from the commercial/industrial development is permitted</p>

	<p>other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.</p> <p>Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 109 of the National Planning Policy Framework (NPPF) and the Dacorum Core Strategy Policy CS32: Air, Soil and Water Quality. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a Principle chalk aquifer. Industrial End 2 processes have the potential to pollute groundwater within the Chalk aquifer.</p>
37	<p>No demolition or groundworks in relation to the outline element of the permission within an agreed phase (under Condition 27) shall take place until details of measures to recycle and reduce construction waste which may otherwise go to landfill, shall have been submitted to and approved in writing by the local planning authority. The measures shall be implemented in accordance with the approved details for that phase.</p> <p>Reason: To accord with the waste planning policies of the area, Policy CS29 of the Dacorum Core Strategy (September 2013), saved Policy 129 of the Dacorum Borough Local Plan 1991-2011 and Policies 1, 2 and 12 of the Hertfordshire County Council Waste Core Strategy and Development Management Policies Development Plan Document 2012 which forms part of the Development Plan.</p>
38	<p>No development in relation to the outline element of the permission (other than site preparation, groundworks, site investigation and remediation) within an agreed phase (under Condition 27) shall take place until an air quality report assessing the impacts of the proposed development on the surrounding environment and uses shall have been submitted to and approved in writing by the Local Planning Authority. The source of energy for the homes, amongst other pollutant aspects of the proposed development, must be considered within the report. The report shall indicate areas where there are, or are 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 development shall be carried out in accordance with the details approved for the phase concerned.</p> <p>Reason: The site is within 0.8 – 1.6 miles of two passive monitoring locations of which the previous and current NO<sub>2</sub> concentration is close to the AQ objective; the size of the proposed development and number of car parking spaces would indicate that the amenities of neighbouring premises should be protected from impacts on air quality arising from the development in accordance with Policies CS8 and CS32 of the Core Strategy (2013) and having regard to the Environment Act 1995, Air Quality Regulations and subsequent guidance.</p>
39	<p>The development shall not be occupied within any agreed phase (under Condition 27) of the outline permission until details of the crime prevention measures in relation to that phase to be incorporated into the development in order to meet Secured by Design part 2 certification shall have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the measures approved which shall thereafter be retained and adequately maintained at all times.</p> <p>Reason: To ensure a secure and safe form of development for the residents in accordance with Policies CS11 and 12 of the Dacorum Core Strategy September 2013. Building to the physical security of Secured by Design, which is the police approved minimum security standard, will reduce the potential for burglary by 50% to 75%. SBD housing developments suffer at least 50% less burglary, 25% less vehicle crime and 25% less criminal damage.</p>

40	<p>A. No development in relation to the outline element of the permission within an agreed phase (under Condition 27) shall take place until a Written Scheme of Investigation has been submitted to and approved in writing by the local planning authority in relation to that phase. The scheme shall include an assessment of significance and research questions; and</p> <ol style="list-style-type: none"> <li>1. The programme and methodology of site investigation and recording</li> <li>2. The programme and methodology of site investigation and recording as suggested by the evaluation</li> <li>3. The programme for post investigation assessment</li> <li>4. Provision to be made for analysis of the site investigation and recording</li> <li>4. Provision to be made for publication and dissemination of the analysis and records of the site investigation</li> <li>5. Provision to be made for archive deposition of the analysis and records of the site investigation</li> <li>6. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.</li> </ol> <p>Development shall take place in accordance with the approved Written Scheme of Investigation.</p> <p>B. The development shall not be occupied in respect of any phase until the site investigation and post investigation assessment for that phase has been completed in accordance with the programme set out in the Written Scheme of Investigation and the provision made for analysis, publication and dissemination of results and archive deposition under points 3, 4 and 5 above has been secured.</p> <p>Reason: To ensure that reasonable facilities are made available to record archaeological evidence in accordance with Policy CS27 of the Dacorum Core Strategy September 2013 and saved Policy 118 of the Dacorum Borough Local Plan 1991-2011. The details are required before commencement of development as if they are deferred until after the development has begun, the opportunity for a proper archaeological investigation will have been missed.</p>
41	<p>Should the development in relation to any agreed phase (under Condition 27) of the outline element of the permission have CHP or biomass boilers, no such boilers shall be installed until details shall have been submitted to and approved in writing by the local planning authority in relation to the following matters:</p> <ol style="list-style-type: none"> <li>a. Evidence to demonstrate compliance with 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.</li> <li>b. Details of the boilers / stacks which shall have dry NOx emissions not exceeding 40 mg/kWh (0%).</li> <li>c. Details to demonstrate that the CHP will have a discharge stack which is at least 3m above any openable windows or ventilation air inlets within a distance of 5Um.</li> </ol> <p>The development shall be carried out in accordance with the approved details for that phase.</p> <p>Reason: To ensure an acceptable appearance and that the amenities of the neighbouring premises are protected from increased air quality arising from the development in accordance with Policies CS8, CS12 and CS32 of the Dacorum Core Strategy (2013).</p>
42	<p>No units within an agreed phase (under Condition 27) in relation to the outline element</p>

	<p>of the permission shall be occupied and / or the use of the land commenced until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to/from the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional units to be occupied. Where an infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed infrastructure phasing plan.</p> <p>Reason: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.</p>
43	<p>All burials in the cemetery shall be:</p> <p>a minimum of 50 m from a potable groundwater supply source;  a minimum of 30 m from a water course or spring;  a minimum of 10 m distance from field drains; and  not in standing water and the base of the grave must be above the local water table.</p> <p>Reason: To protect the quality of controlled waters in the local area in accordance with NPPF paragraph 109 and local plan 'Core Strategy' Policy CS32: Air, Soil and Water Quality.</p>
44	<p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <p>S101A  S102A  C109/16344  C101F  C102F  C103C  C104C  C105C  C106C  C107C  C108C  C109  P101G  P102G  P103G  P104E  P105E  P110E  P111E  P112E  P114E  P115B  P181C  P182A  P183A  P184A  P186A  P187A  P188A  P189A  P190A</p>

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TRIN 5-502C

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

#### Article 35 Statement

Planning permission has been granted for this proposal. The Council acted pro-actively through positive engagement with the applicant during the pre-application stage and determination process which led to improvements to the scheme. The Council has therefore acted pro-actively in line with the requirements of the Framework (paragraphs 186 and 187) and in accordance with the Town and Country Planning (Development Management Procedure) (England) (Amendment No. 2) Order 2015.

INFORMATIVES:

## Outline Permission

The applicant is advised that any reserved matters submitted pursuant to the outline permission in relation to the proposed employment site shall have close and due regard to the details submitted within the Design and Access Statement in relation to the indicative layout contained therein, and which the local planning authority considers to be generally acceptable.

## Highway Authority

1. Where works are required within the public highway to facilitate the new vehicle access, the Highway Authority require the construction of such works to be undertaken to their satisfaction and specification, and by a contractor who is authorised to work in the public highway. Before works commence the applicant will need to apply to Hertfordshire County Council Highways team to obtain their permission and requirements. Further information is available via the website <http://www.hertsdirect.org/services/transtreets/highways/> or by telephoning 0300 1234047.
2. Obstruction of public highway land: It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence. Further information is available via the website: <http://www.hertfordshire.gov.uk/services/transtreets/highways/> or by telephoning 0300 1234047.
3. Road Deposits: It is an offence under section 148 of the Highways Act 1980 to deposit mud or other debris on the public highway, and section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure that all vehicles leaving the site during construction of the development are in a condition such as not to emit dust or deposit mud, slurry or other debris on the highway. Further information is available via the website <http://www.hertfordshire.gov.uk/services/transtreets/highways/> or by telephoning 0300 1234047
4. Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence. Further information is available via the website <http://www.hertsdirect.org/services/transtreets/highways/> or by telephoning 0300 1234047.

## Environmental Health

- 1) Unexpected contamination

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.

2) Noise on Construction/Demolition Sites

The attention of the applicant is drawn to the Control of Pollution Act 1974 relating to the control of noise on construction and demolition sites.

3) Construction hours of working – plant & machinery

In accordance with the councils adopted criteria, all noisy works associated with site demolition, site preparation and construction works shall be limited to the following hours: 0730hrs to 1830hrs on Mondays to Saturdays. No works are permitted at any time on Sundays or bank holidays

4) Dust

Dust from operations on the site should be minimised by spraying with water or by carrying out of other such works that may be necessary to suppress dust. Visual monitoring of dust is to be carried out continuously and Best Practical Means (BPM) should be used at all times. The applicant is advised to consider the control of dust and emissions from construction and demolition Best Practice Guidance, Produced in partnership by the Greater London Authority and London Councils.

5) Bonfires

Waste materials generated as a result of the proposed demolition and/or construction operations shall be disposed of with following the proper duty of care and should not be burnt on the site. Only where there are no suitable alternative methods such as the burning of infested woods should burning be permitted.

Thames Water

Trade Effluent

A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent. Applications should be made at <https://wholesale.thameswater.co.uk/Wholesale-services/Business-customers/Trade-effluent> or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

Groundwater

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

	<p><a href="http://www.thameswater.co.uk/wastewaterquality">www.thameswater.co.uk/wastewaterquality</a>.</p> <p>Water</p> <p>Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p>
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## Appendix A

### Consultation responses

#### Comments on amended plans

Tring TC - The Town Council considered its response to this application at an extra-ordinary Council Meeting held on Monday 1st October 2018. Consideration of the application was the only agenda item apart from procedural items. 55 members of the public were in attendance.

Having listened to a presentation by the Clerk on the background to the application and the changes made to the application, the Town Council listened to the comments made by the members of the public and then reviewed the revised application against the LA5 Master Plan Development Principles.

The Town Council welcomed the changes made and considered they enhanced the application. **However, on balance, the Town Council felt further improvements should be made before it could recommendation approval of the application.**

The Town Council felt the application fell short with regard to certain Development Principles. Specifically the concerns were:

1. The siting of the flats (plots 46-54) on the northeast boundary of the existing cemetery on Donkey Lane/Beaconsfield Road. Here the two and a half storey building did not comply with Design Principle 1 and Landscape Principle 4. The scale of the building was also considered to dominate the neighbouring, existing houses contrary to Design Principle 7.
2. Whilst it was recognised that the distance between the existing properties on Okeley Lane and the new development exceed the minimum required by planning regulations, clarity was requested on access to and along the proposed buffer path, and how this would be maintained going forward.
3. The Developer has provided access points on to the site linking to footpaths 48a and 83 and the footpath/cycleway through the site to satisfy Highways & Access Principle 2. Donkey Lane is private property and the right of way is a designated footpath on which cycles are not permitted.

However, the application as it stands does not meet Highways & Access Principles 3 & 5 adequately. To access the Town Centre cyclists and pedestrians are faced with a choice of

busy main roads or residential streets with parking along long stretches of the road or even double parking. The answer probably lies in a section 106 agreement (or CIL financing) that augments existing cycle and pedestrian routes into town from the points of access provided.

4. The Town Council felt that an opportunity was being missed to achieve a higher level of energy efficiency throughout the site e.g. use of solar panels, higher levels of insulation and provision for electric cars. The Council acknowledges that the Developer will meet all current regulations and may well exceed certain standards.

That the design of the houses with the latest changes has addressed the criticisms of the Chilterns Conservation Board is to be commended in the protection given to the A.O.N.B. through adopting a traditional approach.

Accepting the timeframe over which the Master Plan was developed, circumstances have changed with accelerating pressure to build more houses whilst the supply of suitable sites dwindles. The Town Council believes a more radical approach to design is needed – one that could also respect the relationship with the A.O.N.B. The application fails design principle 8.

## **References: Development Principles**

### *Design Principles*

1. Limit buildings to two storeys, except where a higher element would create interest and focal points in the street scene, particularly to create a central focal point in the development area.
7. Plan the interface of the development area with existing homes, the cemetery and open space carefully to protect local amenity, including landscaped buffers where appropriate.
8. Secure high sustainability standards in design and construction

### *Landscape Principles*

4. Protect the green and open setting of Tring Cemetery, which is a locally listed historic park or garden

### *Highways & Access*

3. Plan good pedestrian and cycle access to the local area and key local services, such as bus stops and community facilities.
5. Develop an access strategy which maximises the integration with the existing urban area, whilst minimising impacts upon the local highway network.

(15/10/18)

Drayton Beauchamp PC - As Chairman of the Drayton Beauchamp Parish Meeting, I would raise the following objections to the amended plans:

1. The new figure of 226 homes is still a major (25%) increase on the 180 figure discussed in the original proposal.
2. Local schools, doctors surgeries and roads are already under strain.
3. The traffic assessment seems to ignore what many see as the most likely journeys - travelling through Tring to the station.
4. There needs to be tight control of ambient lighting to avoid light pollution (especially, but not

exclusively into the AONB).

(03/10/18)

Conservation Officer - We have been involved in discussions on this site over a lengthy period of time and would comment as follows on the final plans:

### **Impact on the cemetery park and garden**

We believe that the buffer area and changes to the layout have now resulted in a proposal, which would sit comfortably with the park and garden. There is now a reasonable buffer area of landscaping between the development and the cemetery, in particular with the introduction of the wall and the footpath, (and its buildings chapel, gate lodge etc) and beyond this the buildings are set back further into the site. Therefore we believe that the setting and significance of this heritage asset and would not be harmed in a way which would degrade its significance or the understanding of the heritage asset. Therefore this element of the scheme would now be considered acceptable. Any harm that would be caused would be less than substantial and at a low level. This is due to there being no harm to the physical fabric, the creation of a buffer and that the landscape to the area has changed in the latter half of the 20<sup>th</sup> century with the expansion of Tring. This harm should be given the appropriate weight in any planning consideration as per the government guidance outlined in the Framework.

In relation to the overall design we believe that the layout and different character areas have resolved many of our concerns with regards to the development. We welcome the outer buffer area of housing which better reflects the character of the AONB. The scale materials and detailing for the housing units and flats appear appropriate including chimneys, use of flint and appropriate fenestration and (subject to final condition) these better reflect the traditional forms and materials seen elsewhere within the AONB in particular when viewed from the surrounding landscape or within the central green area to the core of the development. We therefore believe that the development would not appear partially out of place when viewed from distance or within the landscape and in particular on the nearby footpaths. The large green area towards the dual carriageway would appear to enhance the significance and hopefully add to the improvements providing greater bio-diversity and resilience coming forward at the nearby Tring Park.

Therefore we believe that the design of the scheme would be acceptable and that the impact on the setting of the heritage assets would be relatively minimal.

**Recommendation Overall after negotiation and a number of different revisions we believe that the final design and layout would result in a scheme which would be acceptable to the setting of the character of the adjacent cemetery and sit relatively comfortably in relation to the surrounding AONB. Therefore we believe that the proposals are acceptable. Sample panels of the materials for the dwelling should be constructed on site to agree the final brick, mortar, flintwork, tiles/ slates and landscaping materials. Joinery details, rainwatergoods subject to approval.**

(23/01/18)

Trees and Woodlands - Having looked through all relevant documents, my comments are listed below;

Coloured Site Layout, 16344 / C101D

Whilst the overall layout is acceptable in terms of trees and impacts upon them, I have an issue with two sections; the area of land to the rear of plots 155, 157 – 167, and the area to the rear of 37, 40 – 54 extending to the sides of 1 and 10. Leaving open spaces to the rear of properties attracts anti-social behaviour, both from people congregating

there and also from residents abusing the adjacent space. There are numerous examples across Dacorum where trees and vegetation has been vandalised when located in areas behind residential development, or where residents dispose of garden waste and household items over their fence. We have records of trees that have been poisoned, sawn or chopped down and set alight in similar layouts. It would make far more sense from a tree management perspective to close these areas to anti-social behaviour by extending gardens to meet adjacent boundaries. I do not presently understand the need for 'landscape buffers' in these areas.

Arboricultural Impact Assessment / Arboricultural Method Statement / Tree Protection Plan  
It is recognised that often trees need to be removed to facilitate new development. Whilst it is proposed to remove some trees from the existing site, the number in context is not large and is mitigated by extensive proposed planting. Submitted surveys and plans are accurate and follow relevant British Standard recommendations. Where necessary protective fencing, ground protection and 'no dig' methodologies have been proposed, all in accordance with industry practice.

Landscape Strategy, epd4539\_d012e

The use of native species throughout the planting plan is welcomed and suited to the site, it being located so close to the wider rural landscape. Augmenting existing boundary planting with native infill will enhance screening whilst adding to the site's ecology.

Landscape Management Plan, edp4539\_r003b

The management plan fails to state the current standard for planting trees – BS8545:2014 'Trees: from nursery to independence in the landscape – Recommendations'. A surprising omission for a national standard published in 2014. Tree planting should be carried out in accordance with this document. Referring to the seventeen Soft Landscape Plans, the choice of tree species selected is very good. Native trees are suggested throughout, whilst non-natives such as *Pyrus calleryana* Chanticleer are used in appropriate more urbanised settings. The tree planting detail stated on plan 13 is acceptable.

Overall, I have no objection to the development and proposed tree removals. Trees have been rated accurately and the small number due to be removed are mostly of low or moderate category. The retention of existing trees will add a maturity to the development and soften its visual impact upon the surrounding area. Landscaping and new planting proposals are of a high standard and will create visual interest throughout the site.

Luke Johnson  
(17/10/18)

**Environmental Health - This department recommends that permission be refused on the grounds of 'noise'.**

**Comments for recommending refusal, based on review of architectural plans**

1. The site appears overdeveloped based on proximity of residential external amenity to local road network and likely noise emissions.
2. The site appears overdeveloped based on proximity to proposed/existing industrial estate.
3. The Professional Practice Guidance on Planning and Noise (2017), good design for residential principles appear not to have been properly considered.

**Comments for recommending refusal, based on review of acoustic report:**

1. Monitoring Period

a. Table 8.2 states the windspeed for the monitoring period as ranging from 8.2m/s - 9.8m/s; whilst pleasing to note it is factually and accurately stated, caution is drawn to it exceeding the desired monitoring windspeed conditions of <5m/s.

b. Local area records show wind speed in the region of 22mph+, with wind gusting to around 35mph; the effect on the site is not known. However, this windspeed would equate to a moderate to fresh breeze. Local area records indicate that the wind direction was easterly, yet MP1 and 2 are to the east of Icknield Way. Therefore, this department has concern that the full noise effect of road traffic has not been properly considered.

i. This dept understands that weather is variable. However, in wind conditions such as this in order to validate results, we would expect a longer-period of monitoring than the 24-hours measured.

## 2. Omission of Data, with no sound reasoning

a. The report states, "7.4.6. *At monitoring position 2, uncharacteristically high data was observed between the hours of 0320-0340 which affected the overall levels quite significantly for the night time period and as a consequence these have been omitted from the calculations.*" Yet, no comment or suggestion as to what caused this event was provided. Therefore, it cannot be stated as uncharacteristic for the locality, when the author does not know the locality and when monitoring occurred over only one night. Therefore, either this period should not have been emitted, or audio triggers should have been set on the sound level meter to validate the reason for omission or additional monitoring undertaken.

## 3. BS8233:2014 internal ambient noise criteria

a. Section 8.1.1 to calculate glazing levels, states that glazing has been based on the "*the simple calculation method from BS8233:2014*". For a development of this size, with close proximity to road traffic, proposed and existing industrial estate. It is surprising to read that the simple method was considered acceptable.

b. No justification as to why the simple method was used has been stated.

c. This department is of the opinion that the detailed façade sound reduction method as laid out in BS8233:2014 should have been used.

d. ProPG 2017 guidance references in-depth the requirements of considering LAMax levels. Yet, the report does not reference LAMax. This department agrees with the ProPG2017 guidance that LAMax needs to be considered; when specifying façade attenuation. This dept considers that in most circumstances within the Borough in noise sensitive rooms at night (e.g. bedrooms) good acoustic design can be used so that individual noise events do not normally exceed 45dB LAMax,F more than 10 times a night.

## 4. External Amenity

a. Section 8.3.5. Garden Areas – It is stated "*External levels are likely to exceed the 55dB LAeq,T in most gardens towards the north of the proposed development.*" Typically good design would enable levels not to exceed 50dBLAeq,16hr with an upper limit of 55dBLAeq,16hr. The report has not clarified which proposed dwellings will exceed this target and which will not. Given the size of proposed development, it is not unreasonable to expect to see detailed calculations and modelling, showing which part of the site are unsuitable for residential with external amenity to ensure that external amenity will not exceed 55dBLAeq,16hr.

## 5. Proposed Industrial units

- a. Section 9.1. Methodology states that *“It is noted that commercial premises is to make up part of the new development in the north east section and will be adjacent to the existing Icknield Way Industrial Estate.”* In determining the cumulative rating level from industrial sources, it is considered that the author has made significant assumptions without sound basis.
- b. For example, a 6dB penalty for tonality has been set. Yet of concern, no penalty for intermittency or impulsivity and/or other special characteristics made.
- c. The author states these are unlikely, yet in a later section references intermittent activities from the existing industrial site.
- d. The mechanical plant, site operators and activities is not yet known. Therefore it is considered that penalties have been predicted without sound reasoning. This department does not consider it unreasonable to assume penalties should be incorporated for intermittency and impulsivity based upon the number of proposed industrial units proposed and the myriad of noise sources, that might cause emission at receptor.
- e. This department disagrees with the authors sweeping statement made in section 9.2.3 and 9.2.4; (see: Report Table 12 of existing industrial site), the report author is politely referred to BS4142:2014.
- f. Such noise sources that could be considered tonal, intermittent or impulsive stemming from an industrial site include but are not limited to HGV reversing beepers, fans, generators a/c, AHU, LEV's all being on/off, metal cage/pallet deliveries, forklift trucks, rubbish collections, glass breakage, radio's etc.

## 6. Existing Industrial Site

- a. As per ProPG 2017 and BS8233:2014 guidance, the author is correct to undertake an attended assessment and attended measurements of the existing Noise Sources
- b. The author is suitably accredited as being technically competent to produce the report. However, Table 12 suggests a 'site technician' undertook the attended measurements and therefore would have subjectively considered the need for penalties and set these. Therefore, the site technician names and competencies need to be provided; to ensure that they are suitably competent to undertake a BS4142 assessment.

(20/10/18)

**Scientific Officer - We have no objection to the proposed development on the ground of air quality and land contamination.**

However, having given adequate consideration to the submitted Phase 1 Geo – Environmental Desk Study Report with reference BRD3038-OR1-A prepared by BRD Environmental Ltd dated September 2017, Geo – Environmental Site Investigation Report with reference BRD3038-OR2-B prepared by BRD Environmental Ltd dated December 2017, Planning statement and the Design and Access Statement, the following planning conditions and informative are recommend for the proposed development should planning permission be granted having also take note of the applicant submission in sections 7 (Soils Risk Estimation), 8 (Ground Gas Risk Estimation) and 9 (Risk Evaluation) of the submitted Geo – Environmental Site Investigation Report dated December, 2017 as it regards the site contamination.

### **1). 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.**

### **2). Air Quality Assessment condition**

With the proposed development within 0.8 – 1.6 miles of two of our passive monitoring locations of which the previous and current NO<sub>2</sub> concentration is getting closer to the AQ objective; the size of the proposed development and number of car parking spaces, An air quality report assessing the impacts of the proposed development is to be provided 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 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.

**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).**

### **3). Energy Source Condition**

- a. With the applicant failing to reference fully 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 5U<sub>m</sub>. 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).**

**4). 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.

Kenny Abere  
(28/09/18)

PROW Officer - The application site is crossed by Tring public footpaths 48A and 71.

Tring 48A will need to be diverted. The diverted path will become an urban path passing through the development. As such the diverted path should be constructed with an all weather, sealed surface (tarmac) to a minimum surfaced width of 2m. The edging of the path to be PCC blocks to provide path longevity.

There is a requirement to upgrade Tring footpath 71 to a bridleway. Equestrian traffic already use this path, and have done so for many years, to access extensive off-road routes south of Aylesbury Road. This would also allow cyclists to use the route legally (upgrading to a HCC Cycleway would require us to meet HCC Highways specification – tarmac surface, etc). We would seek a five metre strip to be dedicated as the extent of the highway and, three metres of that to be a pathway constructed of stone, i.e. granite.

Tring footpath 83, known as Donkey Lane, abuts the site and will, undoubtedly, become a far busier route given the scale of this development. Currently this route is a natural surface but, with an increase in pressure, this surface is unlikely to be adequate. Therefore we would seek an improved surface and suggest a 3m sealed path with PCC edging is constructed to provide an all-weather path for the residents to use. This would encourage sustainable transport use as it points the way to the local shops and, ultimately, the town centre. The N-S 'Green Corridor' link should be seen as an extension of this route and surfaced in the same way.

The 'Western Fields' link towards the Aylesbury Road/Icknield Way junction would, if dedicated as a public bridleway will require a three metre width surfacing with stone within a five metre width dedicated as public highway.

(28/09/18)

Parks and Open Spaces Officer - The bike track worries me. I think they need to put in a proper bike/skate park or at least consider contributing a good sum of money for the one already in Tring. If the land is to be adopted we need to be thinking of the contribution to maintenance too.

(27/09/18)

Historic Environment Officer - The proposed development area is circa 18ha in extent, and lies adjacent to Akeman Street, the major Roman road from Verulamium (St Albans) to west of Tring. An archaeological Heritage Impact Assessment was previously commissioned by Dacorum Borough Council prior to the allocation of this land for development (ASC Archaeology 2013). This study concluded that the site had high potential for the presence of heritage assets dating from the prehistoric period, and low potential for later remains. It also

stated that the potential for the survival of heritage assets on the site was high, and the impact of any proposed development upon buried heritage assets was likely to be moderate to high.

An archaeological geophysical survey and very low level (0.5% sample) archaeological evaluation were also carried out prior to the allocation of the site, on the advice of this office (Stratascan 2013; Archaeological Services & Consultancy 2013) . While a limited number of possible archaeological features were identified, they were not judged to be of sufficient importance to preclude the allocation of the site for development.

Given that 99.5% of the site remains uninvestigated beyond the geophysical survey, we now recommend that a further stage of archaeological evaluation take place. This is due to the size of the site, its proximity to Akeman Street, and the general potential for prehistoric remains due to its favourable topographic position.

The Planning Statement submitted with this application proposes to undertake such an evaluation post planning consent, to be secured by planning condition (para 6.79). An archaeological desk-based assessment, submitted to support the planning application, also concluded that further trial trenching evaluation was necessary (although concerningly seemed unaware of the geophysics/trial trenching that has already occurred - p. 16). In this instance we agree with these conclusions. The evaluation should comprise a sufficient sample to determine any areas where future mitigation measures are necessary, such as recording via open area excavation or preservation *in situ* of remains.

I believe therefore that the proposed development is such that it should be regarded as likely to have an impact on heritage assets of archaeological interest and I recommend that the following provisions be made, should you be minded to grant consent:

1. The archaeological field evaluation of the development area, prior to any development commencing;
2. such appropriate mitigation measures indicated as necessary by the evaluation. These may include:
  - a) the preservation of any archaeological remains *in situ*, if warranted, by amendment(s) to the design of the development if this is feasible;
  - b) the appropriate archaeological excavation of any remains before any development commences on the site;
  - c) the archaeological monitoring and recording of the ground works of the development, including foundations, services, landscaping, access, etc. (and also including a contingency for the preservation or further investigation of any remains then encountered);
3. the analysis of the results of the archaeological work, with provisions for the subsequent production of a report and an archive, and the publication of the results, as appropriate;
4. such other provisions as may be necessary to protect the archaeological interests of the site.

I believe that these recommendations are both reasonable and necessary to provide properly for the likely archaeological implications of this development proposal. I further believe that these recommendations closely follow the policies included within Policy 16 (para. 199, etc.) of the National Planning Policy Framework. and the guidance contained in the Historic Environment Planning Practice Guide.

In this case two appropriately worded conditions on any planning consent relating to these

reserved matters would be sufficient to provide for the level of investigation that this proposal warrants. I suggest the following wording: [www.hertfordshire.gov.uk](http://www.hertfordshire.gov.uk)

#### **Condition A**

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

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

#### **Condition B**

i) Demolition/development shall take place in accordance with the Written Scheme of Investigation approved under condition (A).

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

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

Dr Simon Wood

(26/09/18)

LLFA - Following a review of the Flood Risk Assessment and Drainage Strategy carried out by Woods Hardwick Infrastructure LLP reference 17918/FRA dated August 2018 in support of the above application, we can confirm that we the Lead Local Flood Authority (LLFA) have no objection in principle on flood risk grounds and can advise the Local Planning Authority (LPA) that the proposed development site can be adequately drained and can mitigate any potential existing surface water flood risk if carried out in accordance with the submitted drainage strategy.

The proposed drainage strategy for the residential site is based on infiltration and infiltration tests have been carried out to ensure the feasibility of the proposed scheme. The recorded infiltration rates ranged between  $1.38 \times 10^{-4}$  m/s to  $6.14 \times 10^{-5}$  m/s. discharge surface water from private areas via permeable paved driveways and private drives. Infiltration basins with ring soakaways located beneath are proposed to drain the surface water runoff from the adoptable roads. The drainage strategy has been designed to accommodate surface water during a 1 in 100 year plus 40% for climate change onsite.

We note that the employment area and cemetery extension for which outline consent has been sought has not yet been confirmed. Therefore no plans are available for these areas as such it is not possible to confirm a drainage strategy. However it is acknowledge that infiltration will be the mechanism used to manage surface water arising from the site. Infiltration testing has been carried out in order to ensure the feasibility of soakage in this area.

### **LLFA position**

As the application forms part of a hybrid application, we therefore recommend the following conditions for the full component to the LPA should planning permission be granted.

#### **Condition 1**

The development permitted by this planning permission shall be carried out in accordance with the approved the Flood Risk Assessment and Drainage Strategy carried out by Woods Hardwick Infrastructure LLP reference 17918/FRA dated August 2018 and the following mitigation measures:

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 + 40% climate change event.
2. Implementing appropriate drainage strategy to permeable paving, infiltration basin and soakaways as indicated on the Drainage layout drawings 17918-TRIN-5-200-D and 17918-TRIN-5-201-D

#### **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 the Flood Risk Assessment and Drainage Strategy carried out by Woods Hardwick Infrastructure LLP reference 17918/FRA dated August 2018.

The scheme shall also include;

1. Detailed engineered drawings of the proposed SuDS features including their, location, size, volume, depth and any inlet and outlet features including any connecting pipe runs and all corresponding calculations/modelling to ensure the scheme caters for all rainfall events up to and including the 1 in 100 year + 40% allowance climate change event. 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.
2. 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.
3. Details of final exceedance routes, including those for an event which exceeds to 1:100 + cc rainfall event.

#### **Condition 3**

Upon completion of the drainage works a management and maintenance plan for the SuDS features and drainage network must be submitted to and approved in writing by the Local Planning Authority. The scheme shall include maintenance and operational activities; arrangements for adoption and any other measures to secure the operation of the scheme throughout its lifetime. [www.hertfordshire.gov.uk](http://www.hertfordshire.gov.uk)

We therefore recommend the following condition for the outline component to the LPA should planning permission be granted.

#### **Condition 4**

No development shall take place until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the local planning authority. The drainage strategy should demonstrate the surface water run-off generated up to and including the 100 year plus climate change critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

The scheme shall also include:

1. Limiting the surface water run-off generated by the 1 in 100 year + climate change critical storm so that it will not exceed the run-off from the undeveloped site and not increase the risk of flooding off-site.
2. 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
3. Implementing the appropriate drainage strategy based on infiltration, using appropriate above SuDS measures.
4. Detailed surface water calculations and modelling for all rainfall events up to and including the 1 in 100 year + 40% climate change event.
5. Details of how the scheme shall be maintained and managed after completion.
6. Detailed engineered drawings of the proposed SuDS measures

Sana Ahmed  
(21/09/18)

The Chilterns Conservation Board - The CCB commends the applicant for taking a detailed look at the previously raised objection and for the submission of amended plans including increased gaps and reduced density, removal of the 2 and a half storey element from the western boundary, increased use of green corridors and design amendments to remove render and add features including chimneys.

To assist the CCB's methodology for assessment is based on the Guidelines for Landscape and Visual Impact Assessment (2013) as produced by the Landscape Institute and the AONB Management Plan policies, including the CCB Position Statement on the Setting of the AONB. CCB would only wish to clarify 3 further matters and as:

(a) We welcome the landscape architects position on lighting impact. Planning conditions will require further detail when considering their discharge. CCB recommends that control of lighting 'glare' is specifically dealt with in the reasoning behind this condition, to ensure that it is a material matter in that discharge.

(b) That the new planting is welcomed and that the western boundary treatment is further enhanced by use of soft materials for paving and road surfacing along this edge. Further that materials deployed in the design amendments along the western boundary take design cues from the Chilterns Buildings Design Guide and Supplementary Technical notes. We suggest clay roofing tiles for example, to appropriately compliment the design amendments.

(c) That the cemetery extension element further enhances the AONB by promoting design concepts derived from natural burial grounds within the UK for example with the design of woodland or wildflower meadows, and without headstones, tarmac drives and formal features. There are a growing number of natural burial grounds in the UK, but only a couple so far in Bucks and Herts, for example there is a woodland burial ground in the Chilterns AONB at Chesham Bois developed in 2007 as an extension to a traditional cemetery <https://www.cheshamboispc.org.uk/services/burial-grounds/> It has native tree planting and no headstones or grave markings, so maintains and actually enhances the natural environment. Other information is also available at [http://woodlandburialtrust.com/content/woodland\\_burial\\_places.php](http://woodlandburialtrust.com/content/woodland_burial_places.php)

These design issues are also appropriate for a condition but CCB wanted to draw attention to such design matters at the application stage so that appropriate consideration and weight can be attached. We attach an image from the Sun Rising Natural Burial Ground in Warwickshire.

Michael Stubbs

(19/09/18)

## **Comments on initial plans**

### **Tring TC - 1. Introduction**

The above application was considered at an extra-ordinary council meeting held on Thursday 17<sup>th</sup> May 2018. Over 100 members of the public were present and representatives from Cala Homes and their agent were also present.

The chronology of the local allocation, LA5, through the Core Strategy, Site Allocations Document and LA5 Master Plan to the planning application was presented. A summary of the size and type of the residential units with the number of car parking spaces and definitions of the types of affordable housing was available. Also available was a copy of the development principles from the LA5 Master Plan.

The following gives a summary of the extra-ordinary council meeting and the Town Council's recommendation in light of public comment on the application as presented. Subsequently, the Town Council has been informed that the Developer will be producing amended plans triggering a further round of consultation.

### **2. Comment from Members of the Public**

During the public participation session the following issues were raised by members of the public:

- Affordable Housing:
  - How was the composition and type of affordable houses determined?
  - Could that mix be changed? A request for more shared ownership for young professionals was made
  - It was felt that the affordable housing could have been dispersed more throughout the site
- Housing Location & Density
  - Comment was made that the houses proposed were too large and there should be greater emphasis on properties for down-sizing, releasing larger houses for families within the town
  - There was objection to the relatively higher density of housing on the eastern side of the housing development
- Traffic & Transport
  - Concern was expressed:
    - that the lack of a through route from the north of the site to the south would just move a rat-run from the site to Miswell Lane
    - about the traffic that the development would generate within the town
  - Sustainable transport
    - Lack of car parking at Tring Station
    - No cycleway to Tring School or the Station
    - Bus services were considered inadequate except from the High Street. A service into the town should be provided
    - A question of ownership on Donkey Lane to allow the proposed cycleway
- Cemetery Extension
  - The cemetery car parking could be used by residents because of insufficient parking provision
  - There was insufficient delineation between the cemetery car park and the flats
  - Why was the extension separate from the existing site? Comment was made that

given the development no longer included the gypsy and traveller site, the need for a separate extension of the cemetery had been lessened

- Infrastructure Provision
  - There was no spare capacity in the Town's primary schools and there were no plans for the secondary school to expand
  - Would the CIL funds and possible Section 106 agreements be used for the benefit of Tring and how would they be used? The lack of infrastructure provision at the Castlemead development in Pitstone was a cause of the scepticism surrounding "promises" to provide infrastructure
- The Impact on Okeley Lane
  - A lack of detail on the proposed fencing between the new development and Okeley Lane
  - The proximity of the proposed houses and flats to existing properties
  - The inclusion of 2½ storey houses and flats dominating and overlooking Okeley Lane
  - A request was made that building commence on the eastern side to provide screening from the balance of the construction

### **3. Observations on Public Comment**

It was explained that the split between the categories of affordable housing was made on direction from Dacorum Borough Council (DBC) as the most appropriate. The understanding is that this could be changed if there was evidence to the contrary. The Town Council would like to know the basis of the assessment behind the proposed mix.

The Town Council acknowledged the points made by the Cala representative that the Home Development Principle in the LA5 Master Plan that states 'Provide a mix of house types, including family homes and larger, more spacious properties' and reducing the housing density east to west gave the 'softer edge to the countryside' as required. The Town Council would be interested to see if, whilst retaining the principle of the east –west reduction, the gradient could be lessened and still achieve the 'softer edge'.

Infrastructure provision such as a cycleway could come through the Community Infrastructure Levy and possibly bespoke contributions through legally binding Section 106 agreements

The Town Council's understanding was the separate cemetery extension was specified by the DBC Cemeteries Manager to provide a better setting for the natural burial ground and was better suited than land adjacent to the existing cemetery. The proposed location of the natural burial ground softened the impact on the A.O.N.B. Could there be confirmation that this view was still held?

Details of the plans for the cemetery extension were lacking. Would the extension be used exclusively as a natural burial ground? Concern was raised that members of a family with relatives buried in the existing cemetery would not be able to be buried on the same site.

Officers from Hertfordshire's School Planning Section gave a presentation to members of the Town Council on how they monitor and assess the provision of school place during consideration of the Site Allocations Pre-Submission Consultation 2014. Their estimate showed the capacity within the primary schools to meet the forecast growth in pupil numbers. With regard to secondary places, it was their consideration that there was expansion potential at the school, should it be required, to meet local need, but that a detached playing field may be required.

In the adopted Site Allocations Document the position was stated as:

*“The forecast needs for school places in Tring can be met through expanding Tring Secondary School (including the provision of detached playing fields) and by expanding Dundale and Grove Road primary schools”.*

*Para. 7.7 Social and Community facilities in Section 7 Meeting Community Needs*

DBC identified the 2.7 hectare site L/4 Dunsley Farm, London Road, Tring to provide the playing fields.

Members of the public stated that there was no room to expand the capacity of the Town’s primary schools and that there were no plans to increase capacity at Tring [Secondary] School. The Town Council would like confirmation that this is erroneous. The Town believes that outline plans to meet possible growth have been prepared – a new secondary school (in Tring or between Tring and Berkhamsted); 1½ class entry at primary school with the fall-back position of a new primary school. It is accepted that there may have to be some redefinition of catchment areas. There is concern that with the growth of school academies, outside the direct control of the County Council, compromises the ability of the County Council to provide places in the best way.

Cala stated that they were happy to meet and discuss the boundary treatment with residents. The height of the buildings shown in document ‘Plans and Drawings 3 Coloured Street Elevation HH’ contradicts the statement made that 2½ storey houses were normal houses with dormers in the roof. There was unwillingness amongst members of the public to accept the 21m separation from wall to wall.

### **3. The Council’s Recommendation**

Having heard the comments from the members of the public the Town Council resolved to **recommend refusal** of the application. In reaching this decision the following points were made:

- The provision of the necessary infrastructure had always been a concern of the Council. It should be part of the planning process
- The location of the cemetery extension should be reconsidered because of the removal of the gypsy and traveller site
- Detail on the management of the cemetery car park should be provided and the area more strongly delineated
- Improving sustainable transport alternatives to cars such as a better bus service and cycleways should be provided through CIL funding or Section 106 agreements
- The type of housing proposed behind Okeley Lane should be reconsidered to reduce the impact e.g. remove the 2½ storey houses

The Town Council worked hard liaising with Dacorum Borough Council to try to get full involvement with the development of the LA5 planning documents. The Town Council:

- Accepted the need to provide more housing
- Supported the 40% of affordable housing proposed
- Welcomed the extension of the industrial area
- And the inclusion of a natural burial ground as part of the cemetery expansion.

But the Town Council’s support was always subject to two significant conditions – conditions that appeared to have agreement of Dacorum Borough Council during the dialogue:

- That the development would be sympathetic to its prime location as a gateway to Tring
- That the development would be accompanied by the necessary infrastructure.

The recommendation to refuse the application is based on a belief that the proposed planning application fails to satisfy the second condition.

In so doing, insufficient evidence has given to the local community to prove the proposed development is sustainable (The National Planning Policy Framework: Para 17. Core planning principles - principles 11 & 12; Para 35. Promoting sustainable transport; Para 72. Promoting healthy communities; and Para 162. Plan-making Infrastructure apply – see below).

The Developer's agent has indicated that in light of the meeting amendments will be made. Consequently there will be a further round of consultation. This gives an opportunity (i) to provide information on the provision of infrastructure (ii) consider the application of CIL and Section 106 agreements.

In this section the Town Council has asked for clarification on various matters. The Town Council asks that DBC makes available the information it has e.g. from consultation with Hertfordshire County Council Education Department supporting the provision of the necessary infrastructure to accompany the development.

#### **4. National Planning Policy Framework Extracts:**

Para 17. Core planning principles - principles 11 & 12

1. actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and
2. take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

Para 35. Promoting sustainable transport

Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to

- accommodate the efficient delivery of goods and supplies;
- give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
- create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;
- incorporate facilities for charging plug-in and other ultra-low emission vehicles; and
- consider the needs of people with disabilities by all modes of transport.

Para 72. Promoting healthy communities

The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- give great weight to the need to create, expand or alter schools; and
- work with schools promoters to identify and resolve key planning issues before applications are submitted.

Para162. Plan-making Infrastructure

Local planning authorities should work with other authorities and providers to:

- assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands;

(25/05/18)

Drayton Beauchamp PC - I am writing with regard to the above planning application. Unfortunately your on-line system limits responses to 1,000 characters.

I am writing as the Chairman of the Drayton Beauchamp Parish Meeting and would like to make the following submissions:

1. Given the need for new homes, the site chosen seems to be a reasonable one,
2. We are disappointed that Dacorum failed to contact neighbours to the site to notify them of the consultation and also disappointed that Dacorum failed to put up the yellow notices at the start of the consultation period. We would ask that the consultation period be correspondingly extended.
3. We note that the application represents a significant increase in the number of homes originally proposed. Surely the purpose of the 'core strategy' is to let everyone know what is planned.
4. The increase in house numbers has given rise to a range of infrastructure concerns within Tring. With regard to DB, there is particular concern over the implications for increased traffic on the Icknield Way.
5. We also have concerns regarding the potential for light pollution as we are particularly keen to preserve our village's relatively clean night sky. What reassurance can be given on this?
6. The site includes part of the Chiltern AONB and we are keen to see this part, in particular, having full protection going forward.
7. In the shorter term, we have concerns over the potential for disruption during the construction phase, and would suggest strict controls are in place (and enforced) covering working times, and the routes and times allowed for construction traffic. Similarly, there do not appear to be agreed start and finish dates. It would seem sensible to have such requirements established so that the most disruptive building stage is not prolonged unnecessarily.

(21/05/18)

Police Crime Prevention Advisor - Thank you for sight of planning application 4/00958/18/MFA, Hybrid planning application for 226 Dwellings, Cemetery car park with toilet Block and public open space ( Details submitted in Full) and 0.75 Hectares of Employment space (B1a, b and c) and Cemetery Extension of 1.7 Hectares with all matters reserved. ( Details submitted in Outline) LA5, Land at Icknield way , Tring Herts.

My previous comments still stand relating to this application. ( CPDA REF: 12492018). Crime Prevention and Community Safety have been mentioned in the Design and Access Statement (7.7) and compliance with Building Regulations ( Approved Document Q) , however I would ask that the development is built to the Police Approved minimum Security standard , Secured by Design.

(20/09/18)

Waste Services Manager - Houses should have storage space for 3 x wheeled bins and a kerbside caddy and a similar space outside the boundary for presentation on collection day. the collection vehicle is a 26t rigid freighter.

I could not find information relating to the flats so cannot comment on them.

(07/09/18)

**Strategic Housing** - To meet the affordable housing policy requirements 40% of the dwellings should be agreed for affordable housing.

Therefore, 90 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.

Are you able to provide a breakdown of the units please? We can then take a view on selecting the appropriate mix of affordable housing to meet our demand.

Oliver Donohoe  
(07/09/18)

**EA** - We have no additional comments to make further to our letter dated 18 May 2018 (our reference NE/2018/128519/01-L01).

Chris Padley  
(07/09/18)

**Herts Ecology** - 1. There is no existing ecological data for this site within the Herts Environmental Records Centre. The land is reasonably pleasant and ecologically mixed countryside, supporting a range of grassland, arable and hedgerow habitats. Having been **intensively managed for arable and horses**, it has a limited ecological value although the **hedgerow network is locally important**. Changes in recent years – mainly cessation of former arable management – would have enhanced the ecology in these fields but this is a short term gain and would not affect its former intrinsic value. This outline is reflected in the ecological surveys.

2.1 The initial survey by **Ecological Solutions in 2015**, found limited ecological interest of a generalist nature although the ecology reflected its farmland character with typical associated species. I am satisfied that the survey provided a broadly acceptable view of the ecology at that time although I will discuss some issues below. **No significant ecological constraints to development were identified**, although this issue had also been considered during the previous Local Plan review.

2.2 The **Hedgerows H2 and H3** are on the line of the former county boundary; they are likely to be of some **considerable antiquity** which would increase their ecological and cultural value. This local importance is not recognised although H3 supported 10 woody species which suggests considerable age, along with several other hedges within the site.

2.3 **No protected species of note were recorded** (reptiles, limited bat and badger use), although **farmland breeding bird interest was noted** with species such as skylark, song thrush, whitethroat and yellowhammer confirmed or probably breeding with use for foraging by barn owl, probably exploiting the rough vegetation on the ex-arable land.

2.4 No significant adverse effects on the nearest SSSIs are considered to arise from the development given the distance from these (Tring Woods and Tring Reservoirs) and the public open space which will be created on the development site. This will include the Beech Woods SAC of which Tring is a component. It also considers that the development will not have any such impact on these sites in combination with other plans or projects (5.2.4, 7.7). However, **I consider this assessment to be unreliable**; whilst this proposal is for 240 dwellings, the current Local Plan development options are for a further maximum of 2000 dwellings in and around Tring – of which this development can only add to the collective increase in potential

pressure.

Whilst this proposal in itself could not have predicted this new collective impact, it will, nonetheless, **contribute to a locally significant local population increase** and associated requirement for leisure and access to local open spaces. Whilst there will be no direct impacts on the statutory sites, it is therefore not necessarily true to state the indirect impacts will be insignificant. These may also include impacts to Tring Park, Aldbury Nowers, College Lake, Pitstone Hill and the Ashridge Estate, all publically accessible sites. The POS provided will clearly benefit the new communities as a largely formal recreational space locally. In my view, however, **it will not provide the amenity resource provided by the more 'natural' sites locally** which will therefore still be subject to increased visitor pressure.

2.5 It is **recommended the existing hedgerow network is retained**. Other than necessary access points, I support this approach; in any event it should be a clear requirement of the Green Infrastructure associated with the development. One hedgerow will however be removed for amenity reasons, despite its location being identified within a major wildlife corridor, although there are proposals for planting of a new one as outlined within the DAS. Ecological enhancements are suggested and described (5.2.110 and 5.2.211, 7.16) although no details are provided and so remain largely aspirational, although some are shown within the DAS.

2.6 No impacts on bats is predicted, although given the land use change and loss of at least some existing habitat resource, this assumption remains unsupported with any evidence.

3. The updated Ecological Survey (August 2017) found little change in the habitats previously recorded, other than predictable differences as a result of continued abandonment of arable management. Clearly the species assessments in 2017 were limited and were largely not repeated. Whilst **I consider ecological interest is in fact likely to have improved** with changes in vegetation growth and continued lack of disturbance, **I am of the opinion this is entirely a function of management and does not imply any intrinsic ecological interest** which would otherwise represent any constraint on the proposals. It provided a review of the current situation in the context of the previously detailed work and in this respect **I have no reasons to consider its broad assumptions to be unreliable**. I would expect any significant changes e.g. use of the site by badgers, to be addressed by site checks prior to works as necessary following best practice, to ensure no offences were committed.

4. **Landscape Management Plan**. The landscaping approach to **retaining or creating site features where possible is supported**.

4.1 The Management Objectives (4.1) are supported where these provide for ecological conservation and enhancements. Native hedgerow character is recognised and encouraged. **Grassland will be enhanced with wildflowers** and the aim is for it to remain rank adjacent to the hedges. Much of the Plan is a management specification / maintenance schedule; the plans appear to be erroneously defined in terms of meadow and amenity grassland.

4.2 The proposed hedgerow management is not detailed on any plans; the proposals – a mix of flailing, cutting or layering – are not defined clearly on plans; given the nature and use of the POS, **I am also unconvinced any such traditional management such as layering will take place**.

4.3 The **meadow grassland** areas are in fact clumps of wildflower grassland, although the **Soft Landscape Plan** shows most if not all of the open grassland as **amenity grass**. **'Meadow' should apply to a feature which is at least a field in size**, even if only a small field as visually, ecologically and in management terms this would realistically resemble a functional resource and provide a genuine contribution to wildlife, landscape and amenity if accessible. Within the Landscape Management and Maintenance Summary Appendix EDP 3 they are reduced to *Wildflower meadows... around the edges of the site, buffering the retained native hedgerows*. This reduces these areas to strips of longer grass next to hedgerows which

**cannot reasonably be considered as meadows** – although their proposed management is appropriate.

4.4 The **contribution of SUDS features to ecology may be limited**; is dependent upon the extent to which vegetation and wetland habitat can be generated without compromising the structure's functionality for emergency water storage.

4.5 is removal of clover (4.103) really feasible? If **native red clover, this should not be removed** – it is a good pollinator resource. Also the removal of fruit (4.104) is wholly inconsistent with any contribution this makes to ecology.

4.6 Consequently I remain unconvinced that whilst there are sound components of the Plan, it is **currently insufficient in terms of detail, accuracy or delivery to provide for the ecological enhancements claimed**.

5.1 If much of the public open space is to be managed as open parkland as proposed, this would require an amenity grass cutting regime. There are clumps of wildflowers proposed in some plans – but the details are ambiguous. In any event any **ecological gain will be limited** along with the effective **loss of 'countryside' character**, recognised as having very **high sensitivity within the AONB**. This **impact is recognised as having a major / moderate effect** in LVIA S4. The former farmland ecology will be lost by default as a result of changing land use and disturbance.

5.2 The LVIA includes the local plan context of the LA5 Vision, namely that the western fields 'will **enhance** the appearance and enjoyment of the Chilterns AONB'. Given that the character of open countryside here within the AONB will be lost, **I do not consider that the proposals are consistent with the vision**. What will be provided will be largely amenity open space, retaining most features already present, with sound but limited enhancement that cannot recreate the ecological characteristics currently present. Whilst this may serve to provide a **recreational resource** for the local community, it will no longer be of a rural character with an associated ecology which will be lost.

6. Consequently, given the aims of NPPF are to seek no net loss and enhancements, and given the sensitivity of the area generally and the impact of the development, **I consider the landscape proposals should be reconsidered to provide greater ecological gain**. This is also consistent with DBC policies such as CS25 Landscape Character, CS26 Green Infrastructure.

7.1 If genuine ecological enhancement is proposed within the development site, I would expect most if not all the whole of the western field to be managed as a genuine meadow, if necessary with new scattered clumps or individual standard trees, creating the **parkland** referred to within the vision. This would then be wholly consistent with the parkland character locally on the edges of Tring at Tring Park and Pendley, both historic and natural local landscapes within the AONB. The meadow should be enhanced by creating wildflower grassland, fenced (with suitable access points for machinery and public) to enable a combination of hay cutting and livestock grazing to take place. A corner of this field (outside the fenced area) could also be used to create a **community orchard**, diversifying the landscape locally and providing an additional amenity and ecological resource – as long as the fruit is not removed... The adjacent meadow north of the cemetery could be wholly set aside for more **formal recreation** – the open space of both field and cemetery areas providing a buffer between the new built environment and a more traditional landscape beyond.

7.2 I consider such an approach would generate **real environmental enhancement**, provide genuine countryside character locally, improved ecology and capacity for informal recreation to experience wildlife and livestock grazing, linking with adjacent farmland beyond. New communities would be provided with an opportunity to experience part of a traditional local

countryside, its character and management to enhance their quality of life and understanding of the rural environment – consistent with its location **within a nationally important designated landscape**. This may also help to reduce pressure on similar sites elsewhere as this resource and experience would be available adjacent to the development. It would help to maintain Tring's intimate relationship with its rural hinterland, currently under intense pressure.

8. However, if this approach is considered unacceptable or undeliverable (Tring Park and Aldbury Nowers SSSIs are or have been managed by local farmers / graziers in Tring) then **ecological enhancements offsite should be proposed** which provide enhanced biodiversity associated with the farmed landscape surrounding the site, which will otherwise be lost locally as a result of the development.

9. Whichever approach is taken, I consider the **current landscaping proposals** – whilst positive, constructive and reasonably sound in respect of management - **do not adequately satisfy the expectations of NPPF in respect of ecological aspirations and the impact on the local ecological character**, in addition to DBC policies and the Vision for this site.

10. Furthermore, **no evidence has been presented that reliably demonstrate the proposals would not contribute to an increased impact on the statutory sites in the area**, all of which are largely accessible. Consequently this should increase efforts to provide high quality and appropriate resources locally to reduce the need for visiting other sites for passive recreation.

11. **Consequently, if the issues above cannot be addressed through reserved matters** (Public Open Space is subject to this full application) **I advise DBC should not determine the application** until this issue is resolved to ensure a more ecologically sound approach to enhancements associated with this development are considered acceptable.

Martin Hicks  
(16/07/18)

Design Out Crime Officer - Crime prevention and community safety are mentioned In the Design and Access Statement ( 7.0 Technical requirements, 7.7 crime prevention and community safety) . However Secured by Design is not mentioned , I would encourage the applicant to build the development to the police minimum security standard , Secured by Design.

Layout - I would advise some form of traffic calming at the entrance and exit to stop mopeds driving through and round the development. ( there has been an increase with regard to this problem).

I have notified the relevant Police departments regarding this application , however we would like to be informed of any planning amendments.

Sophie Groombridge  
(27/06/18)

Chiltern Society - Provision of necessary infrastructure should be part of the planning process. The infrastructure in Tring is already inadequate at the present time. The location of the cemetery extension should be reconsidered since the removal of the gypsy and traveller site. The extension should be adjacent to the existing cemetery.

(21/06/18)

Herts Highways - Notice is given under article 18 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that the Hertfordshire County

Council as Highway Authority recommends that permission be refused for the following reasons:

#### Decision

Hertfordshire County Council (HCC) as highway authority wishes to object to the proposed development as there is not enough information to demonstrate that the proposals would not have a severe impact on the local highway network. The applicant is required to provide an updated Transport Assessment which incorporates the comments provided by HCC in response to the pre-application submission, and reiterated herein.

#### Description of the Proposal

The application is a hybrid planning application for the redevelopment of a greenfield site south of Icknield Way, Tring. Full planning permission is being sought for the construction of 240 dwellings, a cemetery car park with a toilet block, and public open space. Outline planning permission with all matters reserved is being sought for 0.75 hectares of employment space (B1a, b and c) and a cemetery extension of 1.7 hectares.

It is proposed that two new access junctions are constructed to provide access to the development. The junctions will be located on Icknield Way and Aylesbury Road. The Icknield Way access will provide access to the northern section of the residential area and to the employment land use. The Aylesbury Road access will provide access to the south section of the residential area and to the cemetery extension. The north and south sections of the site will be separated by a small strip of greenery. The internal road layout will not connect between the north and south sections. However, an access route will be constructed through the central area which will only be available for use by emergency service vehicles.

#### Site Description

The proposed development site is located south of Icknield Way and north of Aylesbury Road in Tring, Hertfordshire. The site is greenfield land. Aylesbury Road and Icknield Way are both single carriageway, principle B secondary distributor roads which are subject to the national speed limit of 60mph in the vicinity of the site. The site is bound to the north by Icknield Way, to the east by residential properties, to the south by Aylesbury Road and to the west by greenfield land.

#### History

The relevant planning history for the site as follows:

- Pre-application advice was sought from Hertfordshire County Council as highway authority in March 2018. A Transport Scoping Note was submitted for review. The pre-application sought highways advice for a hybrid planning application which sought full planning consent for 240 dwellings, with outline planning consent sought for 3000sqm B1 office space and an extension to Tring Cemetery. HCC as Highway Authority provided comments on the information set out in the Transport Scoping Note.

#### Analysis

The applicant has provided a Transport Assessment (TA) and Travel Plan (TP) for review as part of the application package. This is considered acceptable; however, the TA provided by the applicant is identical to the TA that was provided at the pre-application stage. This version of the TA is incomplete and does not incorporate the pre-application comments provided by HCC in April 2018.

A Design and Access Statement (DAS) is a requirement for all full planning applications that have an impact on the highway, as outlined in Roads in Hertfordshire: Highway Design Guide (3rd Edition). A DAS has been provided as part of the application package and this is acceptable.

#### Policy Review

The following documents have been reviewed within the TA:

- National Planning Policy Framework (2012);
- Manual for Streets;
- Hertfordshire County Council Local Transport Plan 3 (2011);
- Urban Transport Plan for Tring, Northchurch and Berkhamsted (2013);
- Local Allocation LA5 Icknield Way, West of Tring Masterplan; and,
- Dacorum Borough Council Local Plan (2004).

However, the applicant has not considered the following policy documents:

- Dacorum Borough Council Core Strategy (2013); and,
- Roads in Hertfordshire: Highway Design Guide (3rd Edition).

#### Trip Generation

##### Existing Trip Generation

The existing site is greenfield land and has therefore been assumed to generate no trips. This is considered acceptable.

##### Proposed Residential Trip Generation

In April 2018, HCC provided a pre-application response which required amendments to the trip generation methodology which was set out in the applicant's TA.

In the pre-application submission, the applicant established the residential trip rates using the 'mixed private / affordable housing' category in the TRICS database. In the response provided by HCC, the applicant was requested to amend their methodology to provide separate trip rates for the private and affordable housing at the proposed development. This is due to the 'mixed private / affordable housing' category having a large variance in the percentage of affordable to private homes.

Given that the applicant has not updated the TA since the pre-application submission, the proposed residential trip generation profile has not been amended and is therefore not considered acceptable. In any future submissions, the trip generation profile should be amended in accordance with the comments provided by HCC through the pre-application process.

##### Proposed Employment Land Use Trip Generation

The TA submitted by the applicant contains the same trip generation profile for the office as what was provided in the pre-application submission. In the pre-application response provided by HCC, the applicant was requested to review the trip rates gathered from TRICS as these could not be replicated by HCC. The applicant was also requested to clarify whether the GFA of the office land use would be 300sqm or 3000sqm.

Given that the applicant has not updated the TA since the pre-application submission, the proposed employment land use trip generation profile has not been amended and is therefore considered unacceptable. In any future submissions, the trip generation profile should be amended in accordance with the comments provided by HCC through the pre-application

process.

#### Proposed Cemetery Trip Generation

A peak hour trip generation profile has not been provided for the proposed cemetery expansion. This is considered acceptable.

#### Net Impact

The applicant has not provided a net impact assessment of the proposed residential and employment land uses. This should be included in any future submissions.

#### Trip Distribution

The TA provided by the applicant states that traffic will be distributed using a gravity model based on Travel to Work Data for the Tring Ward, which is taken from the 2011 Census Data. This is considered acceptable; however, the TA has not been updated since the pre-application stage and the gravity model has therefore not been provided. This is not considered acceptable and the gravity model should be included in any future submissions.

#### Impact on the Highway

##### Junction Assessment

The TA states that junction capacity assessments will be provided for the following junctions:

- Aylesbury Road / Site Access;
- Icknield Way / Site Access; and
- Icknield Way / Aylesbury Road / The Holloway / B4009 / Tring Hill (Dumbell roundabout)

This is considered acceptable; however, the TA has not been updated since the pre-application stage and the junction capacity assessments are therefore not included in the report. This is not considered acceptable and the junction capacity assessments are required as part of any future submission.

##### Highway Safety

The TA provided by the applicant states that 'Crash Map' will be used to assess collision data for the latest five year period. Given that the TA has not been updated since the pre-application submission, no collision data has been analysed by the applicant. This is not considered acceptable and a review of collision data for the latest five year period should be included in any future submissions. The data should be obtained from HCC and Crash Map should not be used.

##### Refuse and Service Delivery

The TA states that household refuse will be collected within the site. The applicant has provided a swept path analysis of a 9.25m refuse vehicle using both the north and south sections of the site. This is not considered acceptable and a vehicle tracking drawing for an 11.6m refuse vehicle should be provided. Furthermore, it should be demonstrated that a refuse vehicle and a personal vehicle can safely pass each other within the site. Suitable turning heads should be provided within the site(s) to allow a refuse vehicle to enter the site in a forward gear and manoeuvre within to depart in a forward gear.

##### Highway Layout

## Vehicle Access

It is proposed that two new vehicle access junctions are constructed to provide access to the site. The 'north' access will be located on Icknield Way and the 'south' access will be located on Aylesbury Road. In order to improve visibility, consideration should be given to a 6m wide accesses with 10m radiuses. Consideration should also be given to providing the maximum visibility splays at both accesses, as well as any vegetation works needed to accommodate this.

The internal road layout within the site will not provide connectivity between the two access points. A small strip of greenery will separate the north and south sections of the site. However, an access route will be constructed through the central area which will only be available for use by emergency service vehicles.

The TA includes a proposal to lower the speed limits on Aylesbury Road and Icknield Way, which are currently both subject to a 60mph speed limit in the immediate vicinity. On Icknield Way, the speed limit reduces from 60mph to 40mph east of the site. It is proposed that the speed limit west of the site on Icknield Way is reduced to 40mph as well. On Aylesbury Road, it is proposed that the speed limit is reduced to 40mph west of the site, between the Tring Interchange roundabout and the proposed site access. There is a 30mph speed limit in place on Aylesbury Road further east of the site. It is proposed that the 30mph speed limit is relocated to commence adjacent to the site access for vehicles travelling westbound. The applicant should consult with the Speed Reduction Police Department regarding these proposals. A Traffic Regulation Order would be required under a S278 or S38 agreement.

The applicant should provide details of the drainage connections to the highway and a street lighting assessment for both accesses. Confirmation should also be provided on whether the internal road will remain private or be offered for adoption.

## Pedestrian Access

With regards to the proposed Icknield Way access, footways will be provided along the internal road layout which will terminate at the site access / Icknield Way junction. Consideration should be given to extending the proposed internal footway along the south side of Icknield Way, which would ultimately connect to the existing footway further north-east along Icknield Way.

In terms of the proposed Aylesbury Road access, a footway should be provided on the access junction to allow crossing points that connect with the existing footway on the south side of Aylesbury Road.

The applicant is required to provide details of the pedestrian arrangements and whether any variations to the existing bus routes and services are required. If this is necessary, footways should be provided to ensure connectivity to the bus route.

## Road Safety Audit

A Stage 1 Road Safety Audit (RSA) has not been provided and should be provided by the applicant for the proposed new site accesses.

## Parking

### Car Parking Provisions

The Dacorum Borough Council parking standards set out the maximum car parking standards

for new developments within the Borough. Four different accessibility zones are set out within the standards. The proposed development in Tring is located within Zone 4, where 75%-100% of the maximum demand based on the parking standards can be applied.

The following standards apply to new residential developments in Zone 4:

- 1 bedroom dwellings - 1.25 spaces per dwelling
- 2 bedroom dwellings - 1.5 spaces per dwelling
- 3 bedroom dwellings - 2.25 spaces per dwelling
- 4 or more bedroom dwellings - 3 spaces per dwelling

At B1(a) office land uses, 1 space should be provided per 30sqm GFA. For B1(b) research & development, high-tech/B1(c) light industry land uses, 1 space should be provided per 35sqm GFA.

It is proposed that the B1 employment land use has a total GFA of 3000sqm. If this is used as B1(a) office land use, a maximum of 100 parking spaces should be provided. If it is used as a B1(b) or B1(c) land use, a maximum of 86 parking spaces should be provided.

The TA does not specify how many spaces will be provided for the proposed residential and employment land uses. This should be included in any future submissions.

However, it will ultimately be the responsibility of the LPA to determine the acceptability of the vehicle parking provision.

#### Disabled Car Parking Provision

The Dacorum Borough Council parking standards also set out the required parking for disabled motorists. At employment generating development with up to 200 spaces in the car park, an individual space should be provided for each disabled employee plus 5% of the total capacity or 2 spaces, whichever is the greater. The TA does not specify the amount of disabled car parking spaces that will be provided. This should be included in any future submissions.

However, it will ultimately be the responsibility of the LPA to determine the acceptability of the vehicle parking provision.

#### Car Parking Layout

The car parking layout for the proposed employment land use has not been provided. The car park will need to be designed in accordance with the guidance set out in Roads in Hertfordshire: Highway Design Guide (Third Edition).

#### Cycle Parking Provisions

The Dacorum Borough Council cycle parking standards for residential land uses state that one long term space should be provided per unit, if no garage or shed is provided. The TA states that cycle parking for residents and visitors will be provided in accordance with the parking standards. The amount of cycle parking should be specified in any future submissions.

The Dacorum Borough Council cycle parking standards for B1 land uses state that one short term space should be provided per 500sqm GFA, plus one long term space per ten full time staff. On this basis, six short term cycle parking spaces should be provided, plus the long term cycle parking based on staff numbers. The TA does not specify the level of cycle parking for the employment land use. The amount of cycle parking should be specified in any future submissions.

However, it is ultimately the decision of the LPA to determine the suitability of the final parking

arrangements for the proposed development.

## Accessibility

### Bus Services

The nearest bus stops to the proposed development are located on Aylesbury Road, north east of the site access. The bus stops comprise a flag pole and timetable information. The bus stops can be used to access regular services to areas such as Watford, Hemel Hempstead and Dunstable.

### Rail Services

The nearest station to the proposed development is Tring, which is approximately 4.8km north-east of the site. The station is not considered to be within a reasonable walking distance, but can be accessed by bus. The station is managed by London Northwestern Railway and is situated on the West Coast Main Line. Regular services are provided to London Euston, Watford and other local areas.

### Walking and Cycling

There are no footways provided on Icknield Way in the immediate vicinity of the proposed site access. Approximately 125 metres north-east of the proposed site access, a footway is provided along the south side of Icknield Way. A footway is provided along the south side of Aylesbury Road.

Due to the 60mph speed limit along Icknield Way and Aylesbury Road, the roads may not be suitable for all cyclists. The proposed reduction in speed limits may make both roads more appealing to those travelling by this mode. Furthermore, the lack of footways along Aylesbury Road and Icknield Way is not suitable for those wishing to access the site on foot. S106 contributions will be sought for providing crossing points at the Aylesbury Road site access and to the provision of a footway along the south side of Icknield Way, east of the site.

### Construction

A Construction Traffic Management Plan (CTMP) will be required to ensure that construction vehicles will not have a detrimental impact in the vicinity of the site and a condition will be required to provide adequate parking for construction vehicles on-site to prevent on-street conflict and impacts to highway safety.

### Travel Plan

A Travel Plan has been provided as part of the application package. A number of hard and soft measures are recommended by the applicant in order to positively affect the modal shift towards more sustainable modes of transport and to reduce the reliance on private vehicles. The Travel Plan is satisfactory; however, thought needs to be given to how residents are going to access the nearest bus stops. Contributions would also be required via a S106 agreement to cover TP monitoring costs. The following comments should be addressed:

- The Travel Plan Co-Ordinator details are to be provided on appointment along with details of a secondary contact in case of personnel changes. Details of time allocated to the role and frequency on site will also need to be provided.
- Residential Travel Pack contributions - please see Appendix E of HCC's guidance ([www.hertfordshire.gov.uk/travelplans](http://www.hertfordshire.gov.uk/travelplans)) for suggest amounts per dwelling, which can be used towards the provision of vouchers to encourage the uptake of sustainable transport modes.
- Modal shift targets are to be confirmed after the initial baseline survey.

- The suggested monitoring and review strategy is satisfactory.

A fee of £6000 will be secured by S106 agreement for the County Council's costs of administering and monitoring the objectives of the Travel Plan and engaging in any Travel Plan review.

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

Dacorum Borough Council adopted a Community Infrastructure Levy (CIL) in July 2015. Contributions towards transport schemes in the borough would be sought via CIL. A S106 Agreement will be required to secure Travel Plan Monitoring fees.

A S106 contribution would be sought for the provision of easy access kerbing and shelters at the busy stops on Aylesbury Road, at a cost of £8000 per bus stop. A S106 contribution would also be sought for footway provision on Aylesbury Road and Icknield Way and other measures, to ensure the residents can safely access both stops and cross the road to reach the bus stop on the opposite side of the road to the site, such as through a pedestrian refuge.

#### Conclusion

Hertfordshire County Council (HCC) have reviewed the information provided and wishes to object to the proposed development as there is not enough information to support that the proposed development would not have a severe impact on the local highway network. The applicant is required to address the comments provided by HCC in response to the pre-application submission and as reiterated herein.

(08/06/18)

Chilterns Conservation Board - Thank you for consulting the Chilterns Conservation Board (CCB). The western fields are in the Chilterns Area of Outstanding Natural Beauty (AONB) and the rest of the development falls within the setting of the Chilterns AONB. CCB has previously made representations on LA5 through the local plan process and at examination. The adopted policy (July 2017) confirms that Local Allocation 5 at Icknield Way, as identified on the Policies Map, consists of the eastern fields development area and the western fields (within the Chilterns AONB). All of LA5 has been released from the Green Belt, except for the western fields open space. LA5 will deliver the following:

- ? 180-200 new homes in the eastern fields development area;
  - ? An extension in the eastern fields development area of around 0.75 hectares to the Icknield Way Industrial Estate for B-class uses;
  - ? An extension to the cemetery of around 1.6 hectares in the western fields, and also car parking for the cemetery in the eastern fields development area; and
  - ? Open space (around 6.5 hectares) in the western fields.
- Supporting text sets out key development principles, as would apply to the AONB, including to
- ? Limit the effect of new building on views from the Chilterns Area of Outstanding Natural Beauty (AONB).
  - ? The layout, design, density and landscaping must create a soft edge and transition with the AONB and secure a defensible long term Green Belt boundary.

CCB has assessed this application against this policy and considered the relationship with the AONB and its setting, which includes the landscape character of the Chilterns, the Tring Gap foothills and Wendover foothills, with visual connections towards the wooded Chiltern and Tring scarps to the south. We comment below on the Master-Plan document, which is a material consideration.

View across the site to the escarpment

View from the escarpment foothills showing the impact of the pale colour and massing of the employment buildings on the Icknield Way Industrial Estate

View from the public footpath across the western fields to the escarpment

The AONB has a particularly enhanced status in planning decision-making due to its nationally protected status and its sensitive and highly valued landscapes. Development here must serve to conserve and enhance the natural beauty of the AONB as set out in the Countryside and Rights of Way (CROW) Act, Local Plan policy and the NPPF. Policy LA5 is clear in its wording as to the delivery of these duties. The current application does not meet the policy requirements.

CCB recommends that:

(1) The layout is redesigned to achieve 180-200 dwellings. The supporting planning statement makes that point at its 5.22 and 5.23 and 5.61 that the site allocation development plan document should not be seen as a maximum figure. Given the sensitivity of the AONB, the Chilterns Conservation Board does not agree with this. Going above the 200 dwellings increases the volume of development, results in a higher density (notwithstanding the use of 2.5 storeys on corner plots) and displaces the NEAP into the AONB. It does not provide an appropriate development in the setting of the AONB, including views across the site to the escarpment foothills, or a successful soft edge and transition to the AONB. The Master-Plan document of July 2018 carries weight but not to the same degree as adopted Development Plan policy. Further the Master-Plan deals with a number of key principles which are diminished by the higher yield of housing, for example the key development principle of limiting the effects of new buildings from views within the AONB and securing a soft edge and transition to the AONB. An identified constraint in the Master-Plan (at its page 34) is the need to conserve the special qualities of the western part of LA5 and maintain views to but to not have a serious effect on views from the AONB. It is inevitable that to accommodate an extra 40 units requires development to the western boundary and a less open and transitional landscape as is required by the key development principles in the Master-Plan.

(2) In testing the higher number through the planning application process (as 6.9 of the Master-Plan requires) we have concluded that the opportunity is lost to create the necessary transition along the western boundary. A number of design amendments are proposed by CCB. We agree with the applicants' desire to promote simple building techniques consistent with the Chilterns Buildings Design Guide and this approach is also promoted at 6.25 of the Master-Plan. We recommend amendments to the boundary with the AONB (development facing west). These amendments reflect guidance in the CCB Position Statement on Development Affecting the Setting of the Chilterns AONB where it supports in paragraph 18 'Care being taken over the design, orientation, site layout, height, bulk and scale of structures and buildings through the preparation of a design and access statement'. These proposed amendments are as:

(a) That the number of dwellings along the boundary is reduced here and sited (in part) at a right angle to the boundary (i.e. to promoted glimpsed views of brick gables). That much greater green breaks are interspersed between buildings to increase planting. This will enhance the lower density and necessary separation of development along the western boundary.

(b) That part rendered buildings are deleted and replaced by brick (white render is particularly visually stark and harmful to AONB views together with deletion of white facing dormer details - facing west, as well as deletion of any white soffit or barge board detailing). Promotion of such simple roof detailing is the objective here and amended elevations will be needed to secure such detailing along the western boundary. The Chilterns Buildings Design Guide notes that - Use plain red clay tiles whenever possible or slates as an alternative - Clay tiles and slates

should have a slight texture to help weathering - Concrete tiles and pantiles are not appropriate  
- Avoid using bargeboards on 'traditional cottage' designs

(c) A condition on materials ensures that brick and tiles used reflect the CCB Chilterns Brick Supplementary Technical Note, with clay roof tiles and a careful palette for the facing bricks. These should take a design cue from the note so that, for example chapter 1 guides on a variety of Chiltern brick types and a purple-brown or purple-grey palette is traditional for Hertfordshire.

(d) Use of Chilterns brick on the brick walling within the western boundary to the AONB. We would recommend a HG Matthews brick or similar specifically sourced from brickworks within the Chilterns. Further and to create a distinctive wall feature we recommend that an English Bond or English Garden Wall Bond is used. Page 25 of the Brick Supplementary Technical Note provides guidance here. As noted earlier, these brick details will be set within the necessary separation and spacious qualities of the boundary treatment.

(3) That more trees are accommodated within the development to soften it visually, enhance its biodiversity and provide a more spacious layout appropriate the setting adjacent to the AONB. This is, again, a point raised in the Master-Plan which seeks a soft edge as a key landscape principle .

(4) The NEAP is removed from the AONB and accommodated within the developed area, because this will work better from a functional point of view (more used) and avoid potential harm to the AONB from installation of play equipment, hardsurfacing, cycle track, fencing, artificial lighting etc.

(5) Ideally the cemetery extension is moved eastwards by one field to be a proper extension to the cemetery

(6) That the section 106 secures the western fields in the AONB as undeveloped informal open space in perpetuity with their management (as proposed in the LVIA landscape mitigation and landscape strategy plans) controlled both a condition and management plan to promote the biodiversity gains of the meadow habitats.

(7) External lighting is controlled by a condition to protect dark skies in the AONB. The Master-Plan at its 6.28 requires that views of any lighting is avoided, as viewed from within the AONB. A supplementary note and plan showing lighting layout, radii and best practice will assist the Local Planning Authority in exercising control over lighting. As this is a hybrid application (with housing covered by full details) the principle of lighting will need to be covered in this determination, with appropriate details reserved by condition. CCB is grateful for the opportunity to submit these comments. Policy compliance is understandably important here, as considerable attention has been paid to this AONB boundary relationship in the discussion and construction of policy LA5 and in the Master-Plan. CCB promotes amendments. It would assist in the assessment of impacts to have an individual sections and layout plans and elevations (viewed from the open AONB land) to assist in the assessment of impacts. As submitted section G-G on plan GG 16344/C107A presents a much more urban and developed edge to the AONB than that promoted by the policy. It contains 17 dwellings with use of white rendering, white bargeboard detailing, white dormer windows and little real spacious separation and planting. Of the 17 dwellings only one is gable facing to the boundary. CCB considers it very appropriate to promote design amendments here to adhere to the vision and details contained in both the Development Plan policy wording and in the detailed guidance in the Master-Plan.

Michael Stubbs  
(24/05/18)

### Thames Water - Waste Comments

Thames Water would advise that with regard to Foul Water sewage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided

The application indicates that surface waters will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

'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 [wwqriskmanagement@thameswater.co.uk](mailto:wwqriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality)."

### Water Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a water strategy but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No properties shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows from the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development>. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

(22/05/18)

Env Health - I write in regards to the Environmental Noise Survey as submitted by Noise.co.uk Ltd. in relation to 4/00958/18/MFA application for 240 dwellings.

I have reviewed the documentation in regards to noise impacts on the surrounding residential properties from the commercial and other non-residential properties.

I acknowledge that the measurement parameters have been undertaken in accordance with

BS 7445:2003 and BS 7445:1991 with reference to BS 4142:2014 and BS8233:2014.

The final predicated levels as stated within the report are within the accepted reasonable within the development site.

The location of the proposed commercial buildings within the development site have been located to be used as a sound buffer for the residential premises from the existing industrial centre.

Identified glazing specifications have been identified for two areas that have a increase noise mitigation factor to reduce impacts to occupants.

Form the provided data, this department has no objections to the proposed development in regards to the environmental noise impact.

(22/05/18)

Historic Environment Officer - In 2013 the site was the subject of limited archaeological evaluation prior to it being allocated in the Local Plan. This included a desk-based assessment, geophysical survey and trial trenching carried out by Archaeological Services and Consultancy Ltd on behalf of Dacorum BC. However the historic environment record has not received copies of these reports from Dacorum BC. Nevertheless in February 2014 this office gave the following advice to Dacorum BC:

*“This site was the subject of an archaeological desk-based assessment, geophysical survey and limited field evaluation to test the results of the geophysics. No heritage assets of sufficient quality or extent to represent a constraint on the allocation of the site for housing were identified. However, the percentage of trial trenching was very low, specifically designed reveal the presence of any archaeological constraints that might affect the allocation of the site for housing. It is possible that discrete archaeological features or small sites may exist in areas not examined during the evaluation, especially given the nature of the known archaeology (cremation burials of Saxon date that at least of regional importance) from areas adjacent to the site. The presence of such discrete features may represent either a constraint on the construction of individual properties/aspects of the development, or require mitigation through the planning process. I, therefore, recommend that further limited archaeological field evaluation of the site, including the areas which could not be accessed during this first phase of archaeological investigation, is undertaken, to inform the determination of an outline application for housing, and what , if any, mitigation is required.”*

This planning application includes an archaeological desk-based assessment by Thames Valley Archaeological Services. However the report was not produced in consultation with this office. The report does not refer to the aforementioned pre-allocation archaeological investigations. Nor does the planning application include the results of further archaeological evaluation of the site as recommended by this office in 2014.

Therefore before we can advise you, in the first instance we would like to see copies of the aforementioned archaeological evaluation reports.

Andy Instone  
(21/05/18)

EA - The site appears to be greenfield with little evidence of contamination so from the perspective of groundwater quality we have no further requirements with respect to the residential development.

Limited information however is presented on the proposed cemetery extension and the proposed industrial/commercial area. Both these activities have the potential to cause pollution therefore prior to these phases of the development we will require the following conditions. We

ask to be consulted on the details submitted for approval to your Authority to discharge this condition and on any subsequent amendments/alterations.

**Condition 1 – Use of Infiltration Surface Water Sustainable Drainage Systems (For the commercial/industrial area only)** No infiltration of surface water drainage into the ground from the commercial/industrial development is permitted other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

**Reasons** To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 109 of the National Planning Policy Framework (NPPF) and your local plan 'Core Strategy' Policy CS32: Air, Soil and Water Quality. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a Principle chalk aquifer. Industrial End 2 processes have the potential to pollute groundwater within the Chalk aquifer.

**Condition 2 – Cemetery Requirements** All burials in the cemetery shall be:

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

**Reason**

To protect the quality of controlled waters in the local area. The NPPF paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution. This condition is also in line with your local plan 'Core Strategy' Policy CS32: Air, Soil and Water Quality. The submitted planning application seeks to locate an extension to an existing cemetery over a Principal Aquifer.

Chris Padley  
(18/05/18)

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

Based on the information provided to date we would seek the provision of fire hydrant(s), as set out within HCC's Planning Obligations Toolkit. We reserve the right to seek Community Infrastructure Levy contributions towards the provision of infrastructure as outlined in your R123 List through the appropriate channels.

All developments must be adequately served by fire hydrants in the event of fire. The County Council as the Statutory Fire Authority has a duty to ensure fire fighting facilities are provided on new developments. HCC therefore seek the provision of hydrants required to serve the proposed buildings by the developer through standard clauses set out in a Section 106 legal agreement or unilateral undertaking.

Buildings fitted with fire mains must have a suitable hydrant provided and sited within 18m of the hard-standing facility provided for the fire service pumping appliance.

The requirements for fire hydrant provision are set out with the Toolkit at paragraph 12.33 and 12.34 (page 22). In practice, the number and location of hydrants is determined at the time the water services for the development are planned in detail and the layout of the development is

known, which is usually after planning permission is granted. If, at the water scheme design stage, adequate hydrants are already available no extra hydrants will be needed.

Section 106 planning obligation clauses can be provided on request.

#### Justification

Fire hydrant provision based on the approach set out within the Planning Obligations Guidance - Toolkit for Hertfordshire (Hertfordshire County Council's requirements) document, which was approved by Hertfordshire County Council's Cabinet Panel on 21 January 2008 and is available via the following link: [www.hertsdirect.org/planningobligationstoolkit](http://www.hertsdirect.org/planningobligationstoolkit)

The County Council seeks fire hydrant provisions for public adoptable fire hydrants and not private fire hydrants. Such hydrants are generally not within the building site and are not covered by Part B5 of the Building Regulations 2010 as supported by Secretary of State Guidance "Approved Document B".

In respect of Regulation 122 of the CIL Regulations 2010 the planning obligations sought from this proposal are:

(i) Necessary to make the development acceptable in planning terms.

Recognition that contributions should be made to mitigate the impact of development are set out in planning related policy documents. The NPPF states "Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Conditions cannot be used cover the payment of financial contributions to mitigate the impact of a development (Circular 11/95: Use of conditions in planning permission, paragraph 83).

All developments must be adequately served by fire hydrants in the event of fire. The County Council as the Statutory Fire Authority has a duty to ensure fire fighting facilities are provided on new developments. The requirements for fire hydrant provision are set out with the Toolkit at paragraph 12.33 and 12.34 (page 22).

(ii) Directly related to the development;

Only those fire hydrants required to provide the necessary water supplies for fire fighting purposes to serve the proposed development are sought to be provided by the developer. The location and number of fire hydrants sought will be directly linked to the water scheme designed for this proposal.

(iii) Fairly and reasonable related in scale and kind to the development.

Only those fire hydrants required to provide the necessary water supplies for fire fighting purposes to serve the proposed development are sought to be provided by the developer. The location and number of fire hydrants sought will be directly linked to the water scheme designed for this proposal.

I would be grateful if you would keep me informed about the progress of this application so that either instructions for a planning obligation can be given promptly if your authority is minded to grant consent or, in the event of an appeal, information can be submitted in support of the requested provision.

(17/05/18)

SO comments - **we have no objection to the proposed development on the ground of air**

## **quality and land contamination.**

However, having given adequate consideration to the submitted Phase 1 Geo – Environmental Desk Study Report with reference BRD3038-OR1-A prepared by BRD Environmental Ltd dated September 2017, Geo – Environmental Site Investigation Report with reference BRD3038-OR2-B prepared by BRD Environmental Ltd dated December 2017 and the Design and Access Statement, the following planning conditions and informative are recommend for the proposed development should planning permission be granted.

We take note of the applicant submission in sections 7 (Soils Risk Estimation), 8 (Ground Gas Risk Estimation) and 9 (Risk Evaluation) of the submitted Geo – Environmental Site Investigation Report.

### **1). 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.

Thereafter the construction of the development shall only be carried out in accordance with the approved plan. The Construction Management Plan shall include details of:

- a) Construction vehicle numbers, type, routing
- b) Traffic management requirements
- c) Construction and storage compounds (including areas designated for car parking)
- d) Siting and details of wheel washing facilities
- 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.

**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.**

### **2). Air Quality Assessment condition**

With the proposed development within 0.8 – 1.6 miles of two of our passive monitoring locations of which the previous and current NO<sub>2</sub> concentration is getting closer to the AQ objective; the size of the proposed development and number of car parking spaces, An air quality report assessing the impacts of the proposed development is to be provided 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).**

### **3). Noise on Construction/Demolition Sites Informative**

The attention of the applicant is drawn to the Control of Pollution Act 1974 relating to the control of noise on construction and demolition sites.

**4). Construction Hours of Working – (Plant & Machinery) Informative**

In accordance with the councils adopted criteria, all noisy works associated with site demolition, site preparation and construction works shall be limited to the following hours: 0730hrs to 1830hrs on Monday to Saturdays, no works are permitted at any time on Sundays or bank holidays.

**5). 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.

**6). Construction Dust Informative**

Dust from operations on the site should be minimised by spraying with water or by carrying out of other such works that may be necessary to suppress dust. Visual monitoring of dust is to be carried out continuously and Best Practical Means (BPM) should be used at all times. The applicant is advised to consider the control of dust and emissions from construction and demolition Best Practice Guidance, produced in partnership by the Greater London Authority and London Councils.

**N.B. With the size of this development and its location, a CIL should be apply whilst our Lead Officer on Noise will be providing you our comment on the submitted noise assessment report.**

Should you have any further query in respect of the application, please do not hesitate contact me on Ext 2719 quoting Flare reference 548927.

**Kenny Abere**

(16/05/18)

Waste Services Manager - Flats

The provision seems fine but please include storage for 1 x 140ltr wheeled bin per 5 flats at each block.

There should be no steps between the storage area and the collection vehicle which is a 26 ton rigid freighter.

Houses

Again fine but will need space to present the bins outside their boundary nearest the collection vehicle on collection day.

(16/05/18)

CHILTERN SOCIETY -The Public Right of Way Tring 71 and the proposed new path crossing it should be public footpaths with permissive cycling.

(14/05/18)

Herts Property Services - Herts Property Services do not have any comments to make in relation to financial contributions required by the Toolkit, as this development is situated within Dacorum CIL Zone 2 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.

I trust the above is of assistance if you require any further information please contact me or the planning obligations team ([development.services@hertfordshire.gov.uk](mailto:development.services@hertfordshire.gov.uk)).

Anthony Bester  
(11/05/18)

HCC Minerals & Waste - I am writing in response to the above planning application insofar as it raises issues in connection with waste matters. Should the council be mindful of permitting this application, a number of detailed matters should be given careful consideration.

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.

Most recently, the Department for Communities and Local Government published its *National Planning Policy for Waste (October 2014)* which sets out the following:

*'When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:*

*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;*

*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;*

*the handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities, and minimises off-site disposal.'*

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:

Policy 1: Strategy for the Provision for Waste Management Facilities. This is in regards to the penultimate paragraph of the policy;

Policy 2: Waste Prevention and Reduction: &

Policy 12: Sustainable Design, Construction and Demolition.

In determining the planning application, the council is urged to pay due regard to these policies and ensure their objectives are met.

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:

<http://www.smartwaste.co.uk/> or

[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)

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.

The county council as Waste Planning Authority would be happy to assess any SWMP that is

submitted and provide comments to the two councils.

(10/05/18)

Thames Water - Thames Water would advise that with regard to Foul Water sewage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided

The application indicates that surface waters will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent. Applications should be made at <https://wholesale.thameswater.co.uk/Wholesale-services/Business-customers/Trade-effluent> or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

#### Water Comments

On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

(04/05/18)

Herts Valleys Clinical Commissioning Group - Thank you for your consultation letter received with the email below.

I have only recently started working for the HVCCG and understand from my conversations with your colleagues Rebecca Williams and Shalini Jayasinghe that we can seek S106 funding for infrastructure not identified on the Regulation 123 list or identified as an exemption. The 123 list states that CIL will be applicable for the following:

Health Facilities including,

- the provision of replacement hospital facilities on the hospital zone site
- new GP facilities
- mental healthcare

Am I correct in understanding that we are therefore not able to seek s106 contribution towards increasing the capacity of a local GP surgery?

If CIL applies, are we required to comment in order to be able to apply for CIL funding from this

development at the later date?

(01/05/18)

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

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

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

(01/05/18)

## **Appendix B**

### **Neighbour notification/site notice responses**

#### **Comments on amended plans**

67 Beaconsfield Road - Having followed the planning developments on the above mentioned application and attended the local meetings in recent months, I'd like to raise my concerns as a local resident.

Everyone accepts that there has to be, and there will be, a development on this site but the latest amendments are only a nod in the right direction to address the concerns and request for changes. There should be significant improvements made to the plans before they are approved

- I object to the **total number of houses** for this site that exceeds the original proposed as part of the core strategy. Despite the decrease in number, it is still higher than original planned strategy. This end of Tring does not have the infrastructure to cope
  - car parking spaces are inadequate for the average number of cars per household
  - 3. as a local resident at that end of Tring, the traffic in and out of town travelling down Miswell Lane and surrounding roads is already excessive for such old/narrow roads with double parking. I have lost 2 wing mirrors in the last 12 months on Miswell Lane !
  - a. the local surgery (Rothchild House) appears to be not coping with patient load at the moment
- a. I object strongly to the emphasis on the **consideration of how the site will look from the Aylesbury side of the site, and not for how the site will look from the Tring/town side of the side.** I find it incredible that there is not more – if not at least equal – consideration of the current residents who actually overlook the site. The boundary with the current edge of the town has had a dismal level of consideration and

this should be addressed.

- a. the **3 story building/flats in the corner or Beaconsfield Road against the cemetery wall** is illogical - both for 1. the current residents at that end of town the view of a 3 story building in that location is not in keeping and significantly spoils the look of the current trees and cemetery wall (these are one of the most beautiful features of that end of the town) and 2. for the new residents in the flats where they current sit on the plans they will look on to a wall and trees instead of the possibility of having a great view across the Chilterns or Aylesbury Vale if those properties were placed on the other/far side of the site
  1. the **boundary between Oakley Lane and the new development** is still very poor: the suggested "gap" between the houses is concerning if nobody owns it and it does not address the distance and overlooking aspect for those residents
- a. I am in full agreement with one of the local councillors who spoke this week to the **complete lack of innovation and forward thinking in this development.** With the undisputable need for more housing, our developers should be proposing innovative use of space: more appealing 3/4 story flats in appealing locations (as above), designing for local residents in their 50/60s who want to downsize, incorporate cellar space or garages or play rooms (like they do in rest of Europe), incorporating new energy saving strategies, and not simply cramming more standard, conventional, houses into smaller and smaller spaces.

(04/10/18)

9 Fairthorn Close - Really sorry your planning to ruin our green belt. Our only green area locally, but Im sure you couldn't care less in truth, its only a job to you not your life.

These points I believe you cannot conclude as clearly it is too much for the amount of money you will receive from CALA homes. They obviously cant face the public as they didn't attend the LA5 hearing, again not a great start to win over the local public. Please see below if your budget covers the following;

Perhaps look at grey land and redevelopment before bulldozing "easy green fields". More costly financially yes, but I pay enough council tax already and dont actually get much for it. Green belt is priceless, and is there to stop over growing of towns.

You will probably delete this as you have already made up your mind, but I feel the need to inform you that I am against this. Not just in Tring but nationally.

(03/10/18)

62 Icknield Way - I have lived in Tring for over 16 years and really enjoyed being a resident in this lovely town. During this time it has changed considerably as more building work has taken place to infill areas between existing housing and I believe that the infrastructure of our town is already creaking at the seams. There are more cars parked down residential roads such as Miswell Lane and Dundale Road than ever and at the same the roads are busier too! The Schools in Tring both Primary and Secondary are already at maximum capacity in most age groups and the villages nearby are finding it increasingly difficult to get their children accepted as the catchment area gets smaller with larger numbers of people living Tring itself.

I accept it's a desirable area in which to live and there is demand for properties here which is why it's so enticing for a company such as Cala to develop. The number of houses for the LA5 area however does seem excessive at 226 homes and this company do not seem to have had any legal obligation to create further schooling, healthcare provision etc for the increased

population. Without this how do we expect Tring to continue to cater for residents or get the money or support to build such facilities in the future? Has sufficient thought also gone into the type of housing that Cala will build and provide? I don't believe that much social housing or shared ownership are being built and suspect most of the properties will be 3 or 4 bedroom houses aimed at families with large budgets. Once these houses are built that is it and there is no turning back so we need to get this right before a spade hits the ground.

Finally there is the fact that Tring is an area of outstanding natural beauty and once the countryside is gone it's gone forever! What provision have Cala had to make in order to ensure this area is developed in keeping with the AONB?

I propose that Cala are told they have to develop less houses overall but with more of them as affordable homes and with more of the land used as leisure space.

(03/10/18)

Tring Tornadoes - On behalf of Tring Tornadoes JSC, please find set out below our initial views on the latest planning application for LA5, that was unanimously rejected at the Town Council Planning meeting on Monday evening.

For context, I have copied in all of the people I, on behalf of Tornadoes, am in contact with around the future sports provision requirements for Tring, for which, the circa 6.5 hectares of land adjacent to the proposed development are a prime candidate for, for our club specifically, Football generally and broader sports provision overall.

For your reference, those included in our response are as follows:

- a. Michael Curry – Clerk to Tring Town Council (on behalf of all the Tring Town Councillors)
  - 1. Andrew Williams – Leader of Dacorum Borough Council
  - 1. Howard Wells – Chairman of Dacorum Sports Network and Tring Athletic FC
  - 1. Andy Criddle – Vice-Chair of both Tring Sports Forum and Dacorum Sports Network
  - 1. John O'Callaghan – Partnership Director, Herts Sports Partnership
  - 1. Ben Russell - Community Partnerships Officer (Policy & Projects), DBC
  - 1. Karl Lingham – Acting CEO of Hertfordshire FA

As we understand it, all of the open fields to the west of the LA5 proposed development are due to be “returned to the Town” according to CALA Homes, as part of their application. We believe the total footprint is 6.5 hectares. We understand the issues arising for the developer and the Councils around “giving back” and have already proposed locally and through council that the land be gifted to Tornadoes on behalf of the Town. We see no mention of this yet in any of the application proposals.

We are a registered charity and in our current 2018/19 season have currently some 650 playing members and their families (around 10% of the towns electorate). Our heritage of some 48 years, as the largest Junior Sports Club in the Town and surrounding villages, gives us great responsibility for securing, maintaining and enhancing the playing spaces we own / rent.

We are also aware that the CIL/Section 106 money generated from this development is likely to be around £4m and, whilst we understand that DBC will want to ensure that all of that money is spent productively in Tring itself, we'd like to see that more precisely spent on the provision of significant contiguous playing space and sports facilities (akin to what has been happening in Aston Clinton, Berkhamsted, Hemel and beyond). I am sure you are already involved in the FA Local Football Plan for Dacorum and so between us in Tring and the Dacorum Sports Network for the borough and Herts FA / Herts Sports Partnership, we're ready

to help the planning team with the overall plan, just as soon as you have the time.

So, to the application:

1. We welcome new houses to Tring. We know though that the view locally is for the new housing stock to be more oriented to starter homes, affordable family homes and properties into which the older members of our community can “downsize”, rather than any more 4 and 5 bedroom big houses that the town just doesn't need.
1. We observe, that the utilisation of space in this instance and in particular the gradient of the land lends itself to a much higher density of smaller properties, if they are laid out appropriately “up the slope” from Aylesbury Road to Icknield Way.
1. It makes no sense to have an extension of the cemetery located away from the current cemetery. If it has to be extended, at least put it adjacent to the current cemetery and move some of the houses over. Is increased burial grounds the best use of the land though, given the lack of contiguous playing space? How about a crematorium in the existing cemetery grounds instead?
1. The plan to fill the western fields with trees is of great concern to us, as that renders the land useless for sports purposes. There are already existing high hedge borders and plenty of trees in Tring Park, Wendover Woods and the surrounding countryside.
1. It looks like the developer has a plan to site a small play park up in the North east corner of the site. That looks like a complete waste of space to us.

You'll already be aware of the Town plan for creating incremental playing space at Dunsley Farm, which has the full support of Tring Tornados. However, as we have repeatedly said, the delays to actioning that plan are a perfect example of why we need to be pursuing additional / incremental playing space at the same time.

We invite the planning team and CALA to be more imaginative with the development itself and apply far greater emphasis, to how the Western Fields can be used to meet the sports playing space needs of the town.

I am happy to meet with you to further support our views on what the future plan in and around LA5 should be. I'm also happy for either or all of Tring Sports Forum, Dacorum Sports Network and The Herts Sports Partnership to be involved on our behalf.

(03/10/18)

Drayton Holloway & Lodge Cottage, Icknield Way - At the Tring Council meeting on Monday there were many worrying points raised, yet again. It was also unclear to people that the closing date for public comments is actually 3 October. There were also many questions for CALA who weren't there to answer them. This has left residents annoyed and frustrated with the lack of answers available at this critical point.

We all accept that the site will be developed and we need new houses but there seems to be an overwhelming concern that it hasn't been thought through by Cala and there is a lack of detail on many areas and this will result in the area being spoilt and it will have a negative impact on Tring and its residents, which is irreversible.

**From the meeting, these are some concerns which I would ask you to take into consideration before making your decision:**

1. Will the families of Tring be at the top of the list for social housing - apparently the system doesn't work like this. Is it the right mix of housing for the site?
1. Lack of details for planned walking and cycle paths. A very high number of big lorries (ARLA, Heygates, Clarks aggregate) use the Icknield Way daily to access major road networks - it makes this road very dangerous to walk or cycle along. There is also the

increasing volume of traffic going to/from the growing Industrial site. The current grass verges from the A41 roundabouts are a muddy mess in Winter and over grown mess in Summer. There needs to be paths inside the development allowing residents to get to/from the well used bus stop opposite the Crows Nest up to the Industrial site where the paved path begins again to get into Tring.

- The number of houses in the revised plan has only decreased by a meagre 14. It appears to be all about the maximum money CALA will gain on this site at the residents and rate payers loss.
- The lack of infrastructure is a huge concern and there is a lack of information on what would be provided and where it would go. The required schooling can only be sited the other side of Tring so why place so many people this side? Will the Police Station re open ? Is there going to be a plan for a new petrol station when the only one we have is replaced by housing?
- 600+ cars and vans trying to get to the other side of Tring through the narrow double parked streets at peak times is ridiculous - these streets cannot be widened to provide laybys for buses and deliveries so it is jammed at the entry points - this does nothing for encouraging people to visit Tring and spend money in the town with the lack of parking everywhere. The main High Street cross roads in the centre is way too tight for there to be any considerable increase in flow of traffic.
- Hertfordshire Highways report (which is apparently 2 years old!) says Tring can "cope with the traffic" - what was their projection? It should be questioned and updated.
- Entrance points - No detail about the appearance of the entry/exit points of this development, lighting and signage - needs to be appropriate for the AONB area
- Green/ AONB area - how will this area be maintained, by whom and what provisions are there for litter bins, dog fouling and emptying?
- Chilterns AONB state the NEAP /play area should not be positioned where it is as it is impacting on the AONB. CALA have object to this and previously mentioned the possibility of putting in BMX tracks and sports facilities - this is not compliant with the AONB and how will this be controlled to stop development on the green area?
- Street and Road lighting – the height, colour and the glare on the escarpment - all needs to be appropriate for AONB but no details provided.
- Landscaping and planting within the site roads and around all sides of the development -insufficient
- Could this site be better for housing retiring people / people down sizing?
- Concerns over poor designs and parking issues; closeness of neighbouring houses, height of houses and position of higher buildings badly sited - its another samey development - are we missing an opportunity?
- Mrs Oram - CALA have made only a minor effort with the revised plan and missed the opportunity of making some simple changes which would make a huge impact to those people currently neighbouring this site.
- Are existing public footpaths being moved?
- Where are the energy conservation details in the design of the site or the houses?
- Can speed limits be painted on the road rather than more ugly signposts?
- What about moving some of the houses allocated for here to brown field sites in

Tring?

- It is important for Dacorum to get this site right and not spoil the area – once it's gone, that's it, forever. People need to feel there is a space between built up areas, it has a bad impact on everyone to be in constant noise and development – there is hardly a gap between Tring, LA5 and Aston Clinton and the traffic noise is already non stop.
- Construction sites - their location and access points, what are the working days and times - it needs to be considerate for neighbouring residents all around the site.
- How will information be communicated to us?

I realise there is a lot of information here and you have a difficult job ahead but your decision has an enormous impact on thousands of people's lives and future happiness. I hope you see this as constructive and understand how passionate the people of Tring feel about the amount of development and its repercussions.

(03/10/18)

6 Chiltern Villas, Tring - I am re-attaching my letter about the LA5 development proposal which I sent in May. Looking at the current revised proposals submitted by Cala, I believe exactly the same points of objection still apply, so please could I ask you to consider the points this time round. Not having received any reaction to my previous letter and indeed no response to specific questions related to the process of consultation it is not clear if you did read it last time.

At the town council meeting on Thursday, we learned of the new proposals and major concerns were again registered. Not one person spoke up in favour of the revised proposal.

For me, the worst aspect of this proposal is that it is out of date and behind current thinking. So people with an interest in planning will know that the new National Planning Policy Framework published in July this year asks planning departments to think about housing in a different way. i.e. to place a new focus on the needs of older people (not just those in need of specialist housing but the over 55s who still have active lives but might opt to downsize [a policy change driven by a recognition of stark demographic change - and spelt out in many sources]). The government's response to the Select Committee inquiry into Housing for Older People, gives another plain and simple message on this issue to planning departments. In my previous letter I spell out how this current proposal presents an opportunity if we do indeed have to accept building on LA5: with care we can ensure that it meets a current need without putting unacceptable loads on already stretched local infrastructure, but that important idea has so far fallen on deaf ears. Many commentators and even those within the planning community like Sam Dewar, recognise the need to think long and hard over what should be build and why, before plans are drawn up and the first bricks laid. It appears that very little thinking has been applied in this case and it is depressing that no interest or willingness to engage in local ideas.

The design aspects of the proposal are equally out of date. This site could be something inspiring, truly reflecting the best in energy efficiency and renewable energy, for example, yet no effort is made to embrace this. Good planning would secure a crinkly edge, gradually reducing density to the west. This is such a basic failure of the scheme that one is left aghast, wondering if the excellent work of people like Andres Dwany is all in vain. Overall the Cala scheme is lazy, fails to provide housing that is needed, is unimaginative and does not meet the expectations for environmental protection set down in the master plan, particularly on the west side.

I therefore urge you and colleagues to spend some time thinking about this scheme with

a particular consideration of who we are building for. This site calls out for homes for downsizers, and relocators (and some suitable for first time buyers). These are the home buyer categories and age groups that demographics dictate we should be building for in this decade and in the foreseeable future\*. In the LA5 location these buyer categories will not place a huge load on the local schools and transport. Building large family homes (some huge on the LA5 proposal) is the wrong strategy at this time generally, not just in Tring. We are already behind the curve on delivery for over 55s and adding yet further to the wrong type of homes seems to reflect a significant failure of understanding of housing need today.

I hope that after consideration Dacorum planning will once again reject Cala's proposal. I hope that will encourage you to organise a detailed charette process to engage the people of Tring in this proposal and generate something that has tangible value to the Town and something that is welcomed, rather than something forced through against public opinion.

(03/10/18)

35 Okeley Lane - I strongly object to the planning application for the following reasons - Tring cannot support 226 new houses, the original plan was 150. How can the developers justify this increase?

How many new houses have been built in Tring as infill or on brown field sites and is this going towards the total that the Core Plan says Tring needs to accommodate?

Infrastructure - Tring is at saturation point already, there are not enough primary or secondary school places and there are no plans to increase the size of any schools. The Doctors surgery is not coping with the current demand and it is impossible to book an appointment unless you are prepared to wait over a week. My granddaughter needed an urgent blood test asked for by her GP at the practice and they could not offer her an appointment with a nurse and suggested she go to Stoke Mandeville to have this done! Parking in Tring and at Tring Station is already at full capacity. Tesco's is already too small for the town, with too little parking and this development will increase the issues here. How is Tring going to cope with the increased amount of cars, possibly another 450? There is also a risk that Miswell Lane, Christchurch Road and Dundale Road will become rat runs.

The affordable housing is all clustered together and not pepper potted throughout the site as per Cala's planning documents. The distribution on the Okeley Lane and industrial estate side has changed significantly and the affordable housing appears to be in two areas only and these are in close proximity to each other. Throughout the site a large proportion of the affordable housing has been sited adjacent to the existing development. There are also significant concerns about the placement of the flats in relation to Okeley Lane/Beaconsfield Road and the impact this will have.

The 5m buffer between the Okeley Lane properties and the new development - what is this? Will it be accessible to all because it may become a dumping ground or a hangout for youngsters impacting on the residents old and new. If it is completely fenced off with no access who will maintain this and ensure it does not become overgrown or a dumping ground?

How will Cala limit the loss of privacy for the residents in Okeley Lane when the site slopes upwards from the existing dwellings?

How will Cala limit the impact from noise, dust etc to the current residents on Okeley Lane whilst the building takes place over a number of years?

(02/10/18)

61 Highfield Road - I strongly object to the planning application for the following reasons -

Tring cannot support 226 new houses, the original plan was 150. How can the developers

justify this increase?

How many new houses have been built in Tring as infill or on brown field sites and is this going towards the total that the Core Plan says Tring needs to accommodate?

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How will Cala limit the loss of privacy for the residents in Okeley Lane when the site slopes upwards from the existing dwellings?

How will Cala limit the impact from noise, dust etc to the current residents on Okeley Lane whilst the building takes place over a number of years?

(02/10/18)

23 Okeley Lane - We wish to object to the revised planning application Ref 4/00958/18/MFA at LA5, Land at Icknield Way, Tring, Herts.

We would firstly like to express our concern that being a neighbour of the site we received no information regarding this 2nd application from Dacorum planning. This is despite registering previously for any future information regarding development of LA5 and informing the planning department, both in our previous objection and by separate email.

We wish to make you aware of a number of strong objections we have with regards to the proposed development of 226 dwellings on this greenfield site. As an immediate neighbour to the site of the proposed development we are of the view that the development will have a serious impact on our standard of living. Our specific objections are as follows:-

- **Detrimental impact on residential amenities.**

**Master Plan for Local allocation LA 5 policy 6.29 The new housing backing onto the existing houses in Okeley Lane should have longer than normal back gardens, in order to respect the privacy of these properties.**

**Master Plan for Local allocation LA 5 policy 6.41 Existing views into and out of the site should be retained as far as possible and opportunities taken to enhance these views (see photos 9 and 10 below). The landscape strategy, to be produced at the planning application stage, should give further consideration to enhancing existing views.**

We believe the proposed development does not respect the local context, in particular the scale and proportions of surrounding buildings. The proposed 2 storey high houses to the eastern boundary with Okeley Lane properties will have an adverse effect on the residential amenity of neighbours by reason of overlooking, loss of privacy (see point 2) loss of light and the right to enjoy a quiet and safe residential environment due to their orientation. This is also true of the flats located at the end of Beaconsfield Road which are 2 1/2 storeys high.

The orientation of our property in Okeley Lane is west facing which adds to the impact of the development, including loss of light. The gardens of Okeley Lane are approximately 16m in length. The master plan states the houses backing onto Okeley Lane should have longer than normal back gardens. The original plan stated these properties would have 'generous' gardens, this statement is vague without context. The revised planning application now states there will be a 5m boundary, between the new properties and Okeley Lane. The principle of a boundary is welcome however the 5m boundary has just been removed from the new properties gardens. This has made the gardens smaller so they are now not 'longer than normal' or 'generous' .

In seeking clarification from the developer CALA homes they stated the minimum distance required between the window of one property to the window of another property is 21m. This would result in a severe loss of residential amenity. The visual plans show the proposed new properties and gardens but no clear measurements are given. We are very concerned with regard to how far these houses will actually be from our property for the reasons stated, even with the new 5m boundary.

To respect local context and the master plans recommendations the gardens should be increased to be of significant length to ensure the houses are less overbearing and intrusive. This is in addition to the 5m boundary. We would also request that the orientation of the new properties be reconsidered to reduce the impact on residents of Okeley Lane. We would wish Cala homes to explore the possibility of placing houses at a 90 degree angle so the side of the houses face properties in Okeley Lane and glass in windows is obscured.

Views into the site from Okeley Lane are further reduced due to the 2 storey houses and 2 1/2 storey flats.

## **2) Loss of privacy and overlooking.**

### **Supporting Document Woods and Hardwick Topographic Survey May 17 File 44807124**

The proposed site of development rises in height from the eastern boundary. This means that the primary amenity of our garden, would be severely overlooked from the top rooms of the new development 2 storey properties. This would result in a serious invasion of our privacy. The proposed properties have direct facing windows to the rear. Even with the 5m boundary these properties appear to be no further away.

The design of the proposed properties does not afford adequate privacy for the occupants of Okeley Lane, with particular regard to their right to the quiet enjoyment of garden amenities. We would urge you to consider the responsibilities of the council under the Human Right Act in particular Protocol 1, Article 1 that states that a person has the right to peaceful enjoyment of their possessions which includes the home and other land. We believe that the proposed development would have a dominating impact on us and our right to the quiet enjoyment of our

property. Article 8 of the Human Rights Act states that a person has the substantive right to respect for their private and family life. In the case of Britton vs SOS the courts reappraised the purpose of the law and concluded that the protection of the countryside falls within the interests of Article 8. Private and family life therefore encompasses not only the home but also the surroundings.

It is our view that either the orientation of the properties and the window size and window positions should be reconsidered to maintain privacy for residents of Okeley Lane.

### 3) Boundary

**Master Plan for Local allocation LA 5 policy 6.42 All the existing trees on the site should be retained. Also, existing hedgerows should be retained and enhanced, particularly along the green corridor which will run through the middle of the development area.**

The developer proposes to create a 5m boundary between the properties of Okeley Lane and the new development with a 1.8m Close Board fence to the rear of the new properties gardens.

We welcome this boundary but wish to clarify who will have access to this area. Will it be solely the residents of Okeley Lane or will the residents of the new properties be given access to this area. In addition we are concerned that as this area is designated to be amenity grass so will it be maintained or adopted, to ensure it does not become a waste ground. This would be unattractive for all residents and affect the amenity of neighbouring properties. We would propose that residents of Okeley Lane be given sole access to this area from the gated ends of the area and from the rear of their properties by gated access so they are able to maintain their own property fences and hedgerows.

Of further concern is that on the revised plan some hedgerows which run through the centre of the site appear to have been removed. These should be retained according to the masterplan.

### 4) Traffic in Tring

**Master plan for Local allocation LA5 policy 5.9 The development must be brought forward based on a full recognition of the varying facets of sustainable development and minimising carbon emissions. As set out in the NPPF and in the Core Strategy, there are numerous components to sustainable development. In relation to master planning, particular attention should be paid to:**

- minimising the need to travel.
- Minimising pollution in all forms, including emissions and ground and surface water pollution and providing natural solutions to achieve this;
- Minimising energy use through design including considering the orientation of properties at a detailed stage in order to maximise passive solar gain;
- Protecting and enhancing biodiversity in layout and design;
- Using land use planning and design to improve health and well-being, for example, encouraging exercise by easy access to open space, to encourage healthy eating, and ensuring well-designed neighbourhoods that reduce crime and the fear of crime; and
- Integration of new communities with existing ones, maximising connectivity to shops and Tring Railway Station.

**Master plan for Local allocation LA5 policy 6.69 A Transport Assessment will be required at the planning application stage. The applicant should enter into pre-application discussions with Hertfordshire County to agree the scope of the report. The assessment may point to the need for off-site highway improvements.**

As residents of Tring we are concerned about the increase in traffic from the site and its impact on local roads due to noise, pollution and safety. The design of the site means that traffic from the north side with access to Icknield Way will be required to use existing roads to access the town namely, Miswell Lane (which is very narrow), Christchurch Road (has two schools) and Dundale Road (narrow near town centre and has a school entrance at Frogmore Street). We feel these roads are at risk of becoming 'rat-runs' due to the desire of new residents to access the town.

We feel therefore that there should be access through the site to enable northern residents to access the southern exit to the site and Tring without adding traffic to existing residential roads. Alternatively the northern exit could be made a left hand turn only exit so residents had to access Tring via main routes and not residential roads. We feel although the development is planned to be sustainable, people by nature will use cars to access the town.

We are also concerned about the apparent loss of the current footpath across the site from Okeley Lane and where it exits on Icknield Way to meet another footpath opposite by the previous egg farm. The footpath should be retained through the site and an exit made available to meet existing footpaths.

## **5) Infrastructure Requirements**

**Master plan for Local allocation LA5 policy 8.9 The Council has identified the following infrastructure requirements which may need to be secured via a Section 106 agreement or provided from the receipt of a CIL payment**

- Education contributions - for local primary school provision and other educational needs;
- Healthcare contributions – for local services as advised by NHS Hertfordshire/Herts Valleys Clinical Commissioning Group;

We wish to raise concerns regarding available school places and GP surgeries. Current residents of Tring are unable to secure primary and secondary places at schools closest to the site, namely Goldfield Infants School, Bishop Wood Junior School and Tring School. The additional school places required, even if placed at other schools around Tring, would be some distance from LA5 and therefore would be likely to increase traffic on local roads. In addition, the added population in Tring would require additional GP services.

## **6) Density of Development**

***Master plan for Local allocation LA5 policy 5.1 The West of Tring site presents an opportunity to deliver around 180 to 200 homes and provide new cemetery capacity, open space and business premises. However, as stated in the Site Allocations DPD: "the net capacity figures specified provide an estimate of expected capacity and should not be treated as maxima. Final dwelling capacities will be tested through the planning application process, where detailed schemes will be expected to demonstrate compliance with specified planning requirements and other relevant policies and guidance."***

We believe the current proposed development of 226 homes should be reduced to the original 180-200 homes proposed in the Master Plan. This would enable a greater amount of open space within the development which is already limited in Tring, reduce the housing density and reduce the impact of the development upon the surrounding areas of AONB.

## **7) Parking**

The previous proposed development had an allocation of parking spaces which averaged at 2.57 spaces per property. This data for the revised plan appears unavailable with only 45

visitor spaces listed and not residential figures. In some areas of the development the allocation of parking per property is unclear. In addition the flats on the new development appear to only have one allocated space and yet some are 2 bedroom properties.

Our concern is that parking in the future may spill onto the surrounding residential roads and the cemetery parking, especially as the majority of the properties are multiple bedrooms and families may have additional cars. The flats are also likely to have two occupiers with cars. The revised cemetery parking is still accessible to residents of this site for parking, as pathways lead from this walled parking area to housing.

Problems with parking have occurred in Tring with previous developments such as the flats located along Brook Street, the overspill of cars without parking spaces instead park along the road reducing space for the main carriageway.

In conclusion, we would also like to request that, should the application be approved, the council consider using it's powers to enforce controlled hours of operation and other restrictions that might make the duration of the works (currently 5 years) more bearable. We would urge the council to ensure no construction staff access the site from the eastern boundary residential area to avoid inconveniencing neighbours.

We would be grateful if the council would take our objections into consideration when deciding on their application. We would welcome the opportunity to meet a representative of the planning department at our home to illustrate our objections at first hand.

(01/10/18)

13 Okeley Lane - Here we go again! The reduction in house by 14, is laughable!

As stated by so many, Tring cannot cope with anywhere near this number of extra people and cars. The perimeter roads - Icknield Way, Western Road, Miswell Lane are all so narrow or congested as it is and lack of provision/answers on school places seriously concerns me. I'm worried my children may not be able to have secondary school education in the town they live.

There appears to be a 5m strip between the site boundary and our gardens on Okeley Lane now, but no info has been given on if/how we'll be able to access this to gain access to our gardens for house/garden maintenance that is not possible by carrying machinery/tools through our terraced houses.

Loss of privacy is also a huge concern. A massive 4 bed detached house is planned at the end of our garden.

(01/10/18)

6 Weavers Road - The town is already at saturation point regards schooling , services, etc

(26/09/18)

2 Grace Villas, Park Road - I would like to object to this plan on the basis of poor planning of infrastructure to support the development. The proposed number of houses will bring a large volume of people and vehicles to an already crowded town, and no school expansions, gp improvements, public transport improvements or infrastructure improvements are planned to support this. How is the town supposed to cope and effectively support these new residents?!

(26/09/18)

11 Beech Walk - Tring's infrastructure cannot support significant building projects such as

these. Schools are already full- where will the children on this development go to school? We cannot have a situation as in Aston Clinton where half of the village are forced to send their children to a different village school due to over development by developers. I am concerned about other public services such as local doctors surgeries. The waiting times at Stoke Mandeville hospital (the closest hospital) are already lengthy and will only be exacerbated by these type of developments.

(26/09/18)

Drayton Holloway, Icknield Way - I object strongly because the Core Strategy Plan guideline is for 150 houses and Dacorum should not allow this to be ignored and the proposed number of houses this side of Tring is just unviable due to access.

The Core Strategy stated 150 homes on this land adjoining the AONB /Green Belt which CALA has ignored. The reduction of FOURTEEN from 240 is extremely disappointing and a real kick in the teeth for all those who went to the meeting and were distraught. Unfortunately, Dacorum Planning Department weren't at the meeting to hear and see this for themselves and I hope they will be at the meeting on 1st October in Tring.

The access to Tring is via narrow, residential streets. It is frightening to think of an additional 600 cars and vans squeezing through at peak times to get to the Schools, Nurseries, Shops, Surgeries and the Station 4 miles away - all of these services are the other side of Tring - it makes no sense for this number of houses to be situated here. The High Street comes to a standstill when the shops have deliveries because there is no space to pull in and the buses struggle to get through.

Icknield Way access to Tring has

Note: The industrial estate increasing in size which adds hugely to the volume of traffic on this road together with 24 hour ARLA trucks, aggregate trucks & farm vehicles.

+ Miswell Lane - reduced to one lane as double parked all the way to Western Road and traffic has to wait for the bus to go through with queues either side

Christchurch Road - residential road with access to Nursery and Schools at which point it is double parked either side of the + roads to Western Road/High Street

Dundale Road - residential road with access to schools and double parked with narrow access funneling into Dolphin Square Car Park and Tring High Street

Wingrave Road - reduced to one lane as double parked all the way to Silk Mill Industrial area with long queues either side

Aylesbury Road access has one way into Tring

Western Road is reduced to one lane before Miswell Lane, it is double parked by residents cars and any gaps being taken by shop owners, patients to The Surgery/Chemist (which has only has 15 patient spaces!) and the road is blocked when the bus stops as there is not enough space for laybys.

This is a medieval market town and not a new development which can be expanded easily nor is it a Berkhamsted with its wide Georgian streets.

The traffic is so bad, as is the parking that it is stopping the older generation who have lived here all their lives from driving through Tring because it is very difficult at times to manoeuvre and park.

Not only am I concerned about the people who live in Tring but I am concerned about the

people moving here and their expectations. If 800 move in, they would be struggling to find a school for their children; competing for car parking spaces for work, and at the Station, waiting for a GP surgery appointment; needing to drive to Berkhamsted or Aston Clinton to find a petrol station (because Tring's petrol station is going to be developed too!) and there's no sign of a Bank for miles and no manned Police Station. This has not been thought through. Reduce the number of houses!

I also have concerns about the following details which get forgotten about:

+. the cost of the ongoing maintenance of the "Green Area" - who is responsible for this area and will the Council ensure no further encroachment on to the Green Belt and AONB ?

+. will there be enough mature trees and hedging planted to soften the appearance of the development and the road noise. A few trees dotted here and there is not enough. It requires a substantial amount of hedging to be planted and it needs to be maintained so it gets established. It is a real mess along the Icknield Way because the Council don't have the budget to control the old man's beard and tidy up the verges anymore. The green infill is important for the environment, the residents, wildlife and to soften the noise.

+. encroachment of the NEAP play area into the AONB - it should be closer to the houses for parents to see children

+. lighting pollution and glare from road lights on the escarpment spoiling the AONB views

+. ugly road signage - can signs be painted on the roads rather than more signs which get knocked down

Dacorum should reduce the numbers in line with what was proposed or this sets a precedent - support your rate payers, not the developers pockets.

(26/09/18)

Paston Cottage, Asdtrope Lane, Puttenham - We struggle in Tring already for doctors appointments , schooling and parking to add to this is just unthinkable!!

(26/09/18)

80 Beaconsfield Road - There seems a lack of consideration of the impact of having a block of flats at the corner of Beaconsfield Rd/ Donkey Lane. It appears this block has been placed in a corner out of the way with the perspective focussing on the LA5 development, rather than considering the impact on Beaconsfield Rd. In other areas of the site you have various methods to 'maintain aesthetic value', this doesn't seem to apply to this block of flats backing onto Beaconsfield Rd. A block of flats here is inappropriate, it will be obtrusive, dwarf the bungalows near it & will destroy the character of the road. When we had a side extension built onto our house, the plan was initially rejected as the side elevation of the roof was deemed to adversely affect the street scene - this can barely be seen. However, a huge block of flats a few meters up the road is deemed to be ok. How will this not adversely affect the street scene? You will destroy a beautiful piece of scenery that makes this a pleasant place to live. Aesthetics seems to be considered for LA5 but not for current residents.

The cemetery extension would be better placed running up along Beaconsfield Rd/Oakley Lane as this would create a green buffer zone. The Master Plan mentioned concern about gaining a sufficiently large piece of land for this, which is why it has been positioned separately to the current cemetery. But this concern could surely be overcome. New LA5 residents will not know any different & it would preserve a green buffer zone for Beaconsfield Rd/Oakley Lane residents. And a green burial site could preserve the buttercups & aesthetic & wildlife value of this piece of land.

Parking spaces on LA5 is inadequate, most homes now have 2 cars at least. Beaconsfield/Highfield Rd & Oakley Lane residents should have parking permits to prevent LA5 residents from parking on their roads in the evening & overnight.

We were told at the last meeting that if you build the houses the infrastructure will come! It could take years to provide the adequate infrastructure, if ever - will the funds be available to provide it? In the meantime Tring residents will have to put up with it?

We were also told that Tring has to provide 240 more homes. Surely with all the recent small local developments - Mortimer Hill, Frances House site, Grace's orchard, building near station, old health visitor site, old lorry park in Langdon street, Akeman business park - Tring has already contributed towards this number of homes. The quiet creeping up in number of new homes is shocking! Why is this local development not spread out amongst Tring and the villages to lessen the impact?

There has been a distinct lack of consultation with residents living near the LA5 site & across Tring. Shockingly we did not receive a letter informing us of the latest public meeting on 1st October. We live right by the site & will be directly affected by the development. We found out from a neighbour! This is not acceptable & surely is not correct procedure.

(25/09/18)

126 Kingsley Walk - I object

(25/09/18)

23 Christchurch Road - Totally agree we need housing, affordable housing. However the infrastructure in tring cannot cope with this number of housing. This is a market town the high street can barely get a bus and a car down it at the same time. More traffic will cause more problems

Schools, doctors etc and our general infrastructure is struggling as it is but additional housing without the support is not right.

(25/09/18)

82 Mill View Road - Tring cannot support additional housing without improved infrastructure.

(25/09/18)

2 Bulbourne Road - I don't believe that Tring has sufficient infrastructure to support the additional population that would live in these new houses. Doctors Surgeries are very busy, there is insufficient funding to support adequate policing in the town and roads are already very busy and in a poor state. The council is so financially constrained that it cannot afford to keep streetlights on at night. Additional people and costs to provide services for these new people will have a significant negative impact on the town.

(25/09/18)

Kernals, 36 Grove Road - Not enough school or doctor surgery to support this application

(25/09/18)

19 Mill View Road - I object to the proposed development on the basis that the Tring infrastructure is already unable to cope with the amount of people living in the town. The schools are oversubscribed, the roads are rammed with cars, the parking becoming

dangerous for our children and the doctors surgeries are completely unable to cope with the amount of patients they already have.

Though I understand that we need more housing, Tring is not the place for it.

Please don't force my children to have to travel for education and health care because of money making reasons.

(25/09/18)

69 Brook Street - What are the plans for additional infrastructure to make allowance for upwards of 800 new residents?

\* How will schools accommodate this increase?

\* I already struggle to get a dr's appointment within 2 weeks, how will this be handled with the increase in people?

\* I commute into London and the car park is full around 8am, I'm unaware of any consideration for this given the increase in the likely number of people adding to that commute? The car park cannot have an additional layer added due to planning restrictions, so what's the solution?

\* An increase in traffic and parking needs within Tring town centre, how will this be handled?

I'm dismayed that's the original planning was for 160 dwelling and now this is increased to 200+

It feels very much like developers are here to make a profit and don't care about the damage and impact the development will have on the way of life for current residents.

I don't want to hear that there will be consideration to the infrastructure once planning is granted - NO! This needs to be informed ahead of any decision, otherwise how can a decision be made?

(25/09/18)

14 Morefields - I strongly object on the basis of lack of infrastructure.

(25/09/18)

2 Damask Close - The infrastructure in Tring will not be able to cope with so many houses.

(25/09/18)

19 New Mill Terrace - There is not enough infrastructure in place in Tring to cope with this number of new dwellings. Our doctors surgeries are already full as are our schools.

All the towns facilities are the opposite side of the town which could mean a possible increase of 600+ cars coming through an already congested high street.

The area also is green belt and an area of outstanding beauty and totally inappropriate for a development of this size

(25/09/18)

Drayton Cottage, Icknield Way - There simply is not the infrastructure in place to support a development of this scale.

Tring's narrow roads and facilities are already struggling to cope with the flow of traffic. There are considerable difficulties travelling along roads each morning and evening, adding several hundred more people and cars is simply not viable.

(25/09/18)

85 Aylesbury Road, Aston Clinton - Not enough infrastructure , cars will still park in nearby streets and walk through as not enough parking provided .

(25/09/18)

18 Bunyan Close - The Core Strategy Plan outlined 150 houses on this plot - not the 240 CALA applied for.

We don't have the space or infrastructure in Tring for 800 more people and 600+ cars on top of all the other developments planned and approved.

All the facilities are the other end of Tring including the Shops and Supermarkets, Tring Station and Schools.

There is huge concern about the lack of school spaces and pressure on appointments at the Surgery. The Rothschild Surgery has only 15 public parking spaces!

This plot adjoins an Area of Outstanding Natural Beauty and it is going to be packed with houses, cars, road signs and lighting. Green Belt has already been removed and little thought has gone into the maintenance of the remaining.

(25/09/18)

19 Longfield Gardens - I object to this development. Facilities and infrastructure are inadequate to meet the demands that a significant development will require. The quality of roads, the available local doctor and schools are already under strain and should be developed prior to any significant housing development. The development should be significantly made up of real affordable housing as Tring is already blessed with high cost properties

(21/09/18)

23 Frogmore Street - The Core Strategy Plan outlined 150 houses on this plot - not the 240 CALA applied for. They have now reduced the number by just 14 houses - they will get away with it if not enough people respond.

We don't have the space or infrastructure in Tring for 800 more people and 600+ cars on top of all the other developments planned and approved.

All the facilities are the other end of Tring including the Shops and Supermarkets, Tring Station and Schools.

There is huge concern about the lack of school spaces and pressure on appointments at the Surgery. The Rothschild Surgery has only 15 public parking spaces!

Why should CALA be allowed to exceed the number and gain from the profits, whilst the Tring rate payers lose out?

This plot adjoins an Area of Outstanding Natural Beauty and it is going to be packed with houses, cars, road signs and lighting. Green Belt has already been removed and little thought has gone into the maintenance of the green area.

(25/09/18)

7 Fields End - There is no thought as to how these developments drastically affect the parking situation at Tring Station. Already I know there is a massive issue with not being able to park at the station if you arrive later than 8.30am. Many people have to continue onto Berkhamsted station to park instead. They militantly ticket you if you are not parked in a proper space even if

you have a ticket and instead of trying to fix the situation the council continues to punish people who have no choice because they have to get to work. I know that another level cannot be built above the existing car park and I understand that an application may have been made to build underneath, but it seems this is a temporary fix for the distant future (if it gets approval) and would mean much of the car park would be out of action whilst work takes place. On a fundamental level there simply is not enough parking spaces for the number of people that commute from Tring and the surrounding villages as of now. What would Cala Homes do to rectify the problem their building of over 200 houses with no doubt a large percentage of the new householders needing to commute to London etc? This issue cannot be overlooked as it's already at crisis point.

(24/09/18)

47 Christchurch Road - I would like to object to the latest LA5 proposals for the following reasons:

The increase in properties to 240 seems to be pure a classic case of a developer trying to increase their profit after the original outline permission was granted.

240 properties will equate to 500+ extra cars & vans along with extra traffic for home deliveries to these properties.

Access roads (Western Road, Miswell Lane, Christchurch Road and Dundale Road) risk turning into rat runs as residents from LA5 are highly likely to use their cars to access the town centre rather than walk or cycle.

240 dwellings will entail around 200-300 school age children looking for school places within Tring.....the likely outcome is that they might find a place in a village school which will only increase the number of car journeys that need to be made!

Tring has seen an incredible amount of brown site infill development, which is to be applauded in the most part, so surely there is no longer the need to sacrifice extra green field land on this scale?

(21/09/18)

17 Okeley Lane - I have to state that I am getting extremely frustrated to be continually typing in the same responses at the various stages of this tortuous process, but here we go again.

Not for the first time I have pointed out that one of the documents talks about a defensible edge to the green belt. If the council wanted this why did they remove the greenfield designation of the land subject to the planning application. This stated intent just highlights the cavalier approach of the council and the level of contempt it shows to the residents of Tring.

Many other comments in this application have already highlighted the lack of infrastructure to support the proposed development in this application. I will not add to this other than to say I fully agree that new school and surgery places, parking and road access should be in place before this application is approved

At the start of the planning process for plot LA5 it was clearly stated that it was for 160 houses. This application is for 226 and this is the main reason that the plan shows houses a few meters from our back door and looking straight into our garden and windows. Despite previously highlighting this problem to CALA and the council the this amended plan does not appear to have changed. I can understand CALA's desire to cram as many houses as possible into the site, after all they are trying to make as much money as they possibly can from their investment. I would however hope that local councillors from Tring, Dacorum or Hertfordshire would show some interest in their constituent's concerns, unfortunately this is not the case.

This development will look directly into our rear windows and garden from a few meters away. We will have no privacy in our garden on top of losing what we had hoped was our protected view of the Chilterns - One of the reasons we bought the property. Once again, I extend the offer to our elected representatives to visit our house and look at the site from our point of view and see the effect on our privacy. Unfortunately, I suspect we will get the usual response - SILENCE. In short, we object to the plan as it provides no privacy to the existing residents.

The amendment does appear to have made a minor concession in that there appears to be a strip of land between the rear of the gardens on Okeley Lane and the development which would allow access to our back gardens. This would mean that we are not forced to take everything to and from the garden through our terraced houses. There has been no communication from CALA or the council that this is the case and confirmation of this would be appreciated.

The existing footpath that crosses the field to the Icknield Way is currently used by the good folk of Tring to access the AONB and wider countryside. The current plan completely removes this path and it is not clear how we will get the access we currently have to the remaining countryside that is not being destroyed. This footpath needs to be reinstated or at a minimum a suitable route installed in the development to link the Okeley lane entrance to the Icknield Way.

Overall, I have to object to the plan and it should not be approved until our concerns have been addressed including putting in the infrastructure that a development of this size requires prior to it being built.

(20/09/18)

40 Beaconsfield Road - We are writing to state our objections to this development. The following issues still do not seem to have been addressed and we believe that residents of Tring have not been respectfully updated with changes.

To reiterate, the issues that still seem unanswered:

What is the justification of splitting the cemetery?

Why isn't it being extended in line with the existing Roads, Beaconsfield and Oakley?

Is the cemetery being divided to accommodate the cut through footpath?

We value our town cemetery being all on one site. Housing flanked by cemeteries might not seem appealing for some.

In view of the increased traffic that will impact on Western Road and Icknield way, has consideration been given to the environment for wildlife and residents? Noise, pollution and safety will all be affected.

What are your proposals regarding additional parking provisions in town for 400+ more vehicles? It is likely they will drive due to distance and demographic.

Is the council considering a peripheral parking area or pedestrianisation of the town?

Both doctors surgeries in Tring have difficulty providing appointments to the residents of Tring within a fortnight. We have noticed a significant delay in obtaining appointments over the last 2 years. Will you be factoring in a further health centre?

Working in education we are aware there are many issues around catchment of local schools and over subscription. With an increase in primary age children we will need more teachers, bigger schools and diversity of affordable youth activities. What do you propose for this and with what funding?

We would appreciate direct response to these questions. Tring residents are busy, they have

long commuting hours and family commitments and in view of this the meagre efforts by planning to reach out to its community seems somewhat lacking.

Furthermore, there seems to have been a purposeful low level attempt to inform locals as to what is happening. It's your responsibility to keep us informed as much as ours to seek. Are all residents expected to sift through Planning's website to gain access to your housing scheme?

We can account for one flyer in one location within 500 yards of the development.

(20/09/18)

38 Beaconsfield Road - On review of the amended plans I don't see any great changes that would make my previous objections lessen.

I am objecting as

- 1) I still feel that 226 houses are too dense for the area,
- 2) No infrastructure has been put in place ( I do not accept that this will occur once planning is finalised- look at Castemead Pitstone where infrastructure was promised and was not forthcoming),
- 3) Parking remains a concern with too few spaces given for the size of the development likely making our road attractive to park on,
- 4) The cemetery extension is still separate to the original cemetery. As stated before this would have been a great buffer between current Tring residents and the new development which I suspect would make Tring residents happier with this large development.
- 5) The leisure facilities still look small and aren't accommodating a range of ages,
- 6) The problems with increase in families to the area with an already over subscribed GP surgery and full schools still hasn't been addressed as far as I can see,
- 7) The development is still split in 2 with access via the Icknield way for the upper area, and Aylesbury road for the lower, this will increase traffic significantly adding to the rush hour and danger in accessing main routes. Miswell Lane is already too narrow with cars parked either side of the road. Increase traffic will compound this problem.

(19/09/18)

31A Beaconsfield Road - I wish to object to the revised plans. I do not know if this is necessary as I have previously objected in the Spring, I have just heard of the changes to the plans by word of mouth. Surely residents should have been informed of the revisions so they could comment again if they wished. Nobody I know has been informed by the planners of this and I live on an adjacent road.

226 dwellings is still many more than the council agreed in their plan. I agree with 86 Beaconsfield Road regarding the flats. Also there is still not enough parking provided on the entire site. Tring does not have the infrastructure to support the rise in population. The cemetery extension should be adjacent to the current cemetery for ease and also this will provide a buffer to the current housing, in particular regarding the parking issues that will arise on Beaconsfield, Highfield, Oakley Lane etc as a result of the development.

(19/09/18)

48 Beaconsfield Road - I still object to the development planned by Cala. There are still far too many houses in the plan and Tring will not be able to cope with all the extra people, cars etc this entails. It appears that flats are included in the plans which will be seen from Beaconsfield Road which would be obtrusive and should be removed from the plans. The development is far too big and is inappropriate for the needs of Tring. I do realise that houses are needed but this sort of development is not the right thing for the town and it will be a mistake to let it go ahead

on the scale planned. I do hope the plans will be rejected and some sort of compromise made.

(19/09/18)

83 Beaconsfield Road - These plans are very disappointing to put it mildly. This plot is a blank canvas and this is what we end up with? While I have come to accept there will be a housing estate within direct view of my front window, I cannot accept the current plans for the reasons below:

1. The density of dwellings is too great for this site. Most dwellings will have 2 vehicles so where are they all going to fit? There will be cars on verges within the estate and no doubt some will "spill" into Beaconsfield Road. Currently we are blessed with very few parked cars on our end of the road as most of us either have driveways or no vehicles. Will there be plans to put double yellows on the approach and around the 90 degree bend to stop any parking before it even enters someone's mind?
2. Plots 46-54 are clearly flats. Why is one of the tallest structure adjacent to all the bungalows on Beaconsfield Road? Surely these can be better placed away from here perhaps swapping with plots 37, 38 and 39.
3. I still do not understand why the cemetery extension cannot be used as a natural buffer between the new housing and Oakley Lane/ Beaconsfield Road. Using the excuse that it's a natural burial ground does not wash. Extending the current cemetery to the north would provide a far quieter place of rest away from the Aylesbury Road and the not insignificant noise generator that is the A41.

I could go on and on but all the other points have and will be covered by the other objections.

Please take a good look at this plan and come back with a better solution that.

(18/09/18)

29 Okeley Lane - On 17/05/18, I attended a meeting to discuss the Cala Homes proposal for the building of 240 new homes on the LA5 site in Tring. Many issues were raised at the meeting; unfortunately there were no representatives from Dacorum Borough Council in attendance to hear our concerns. Subsequently, I would like to raise objections to the proposal. Myself and my family will be directly affected by the building work and homes on the LA5 site as we live in Okeley Lane and therefore the rear aspect of our home backs directly onto the site. We will also be more generally affected as residents of Tring by the impact on infrastructure.

I should point out that I am not opposed to the building of new homes in the area; I understand that homes are needed, particularly affordable homes for local people. However, having seen the proposed plans I have several concerns:

Firstly, the distance of the houses from existing homes on the boundary of the site on Okeley Lane, which the Cala Homes representative states will be close to 21 metres back-to-back - that is, from the back of the existing homes to the back of the new houses. I feel that the proximity of the buildings will greatly impact on residents' privacy as the windows of the homes are directly facing our windows and rear gardens. Some of these planned buildings are 2.5 storey which means they will have windows in the roof space too, so, even with a proposed 1.8m boundary fence, a full view of our homes/gardens will be afforded to anyone looking out. Cala Homes state that the most dense concentration of new homes will be along this boundary, meaning that our home could potentially be overlooked by several homes. The neighbouring buildings proximity would also increase the potential noise from these homes. Thus, the proposal would greatly harm the amenities we enjoy such as privacy and the right to

enjoy a quiet residential environment. Amenity space and the privacy of adjoining properties should be respected according to the Dacorum Core Policy CS12: Quality of Site Design. Furthermore, the Adopted Master Plan for Local Allocation LA5 states that privacy of neighbouring private gardens should be respected.

The proximity of the proposed development will mean that all residents whose homes back onto the boundary will have a view of densely-concentrated buildings with very sparse natural elements visible. Therefore the visual impact of the development is significant for the boundary residents of Okeley Lane. Planning should avoid visual intrusion, according to the Dacorum Core Policy CS12: Quality of Site Design. The Adopted Master Plan (4.19) also acknowledges the Landscape and Visual Impact Assessment recommendation that a buffer of open space should be sited between existing properties and those closest to the boundary.

The existing homes aspect is west-facing so the new houses will cause overshadowing, blocking out sunlight and warmth particularly in the afternoons and evenings, greatly affecting our enjoyment and use of our rear garden space. As the land on our property slopes upwards from house to end of garden, the proposed buildings will tower over our home substantially which will block out even more light. Again, the dense concentration of building along the boundary means that the overshadowing will be substantial. Loss of sunlight and daylight should be avoided, according to Dacorum Core Policy CS12: Quality of Site Design.

The proposed homes, if positioned at around 21 metres back-to-back from existing homes, would have grounds that are not proportionate to the existing gardens. The properties along Okeley Lane are characterised by rear gardens of around 16 metres in length and front gardens/grounds of almost 10 metres in length. The plan indicates that the proposed homes backing onto the Okeley Lane boundary would have no grounds to the front aspect and would have rear gardens of around 5 metres in length, less than a third of the Okeley Lane gardens. The plan does not respect local context, in particular the scale and proportion of grounds at front and rear to homes.

The planned access for motor vehicles entering and exiting the site will naturally increase traffic flow into Miswell Lane and Christchurch Road, being the most direct routes into the town from Icknield Way, turning these roads into 'rat runs'. This is particularly worrying as both roads are frequently traversed by young children walking to local schools (Goldfield and Bishop Wood), therefore highway safety is at risk.

Finally, there is the matter of infrastructure to consider. Cala Homes have increased the number of homes from the original plan of 150 to 240; as many of these are larger family homes, this will substantially increase the population of Tring. As many residents of Tring at the meeting pointed out, there are not enough primary school spaces for the children who currently live in Tring with some classes already exceeding 30 pupils. There seems to be no forward-planning to acknowledge the impact that the increased population will have on the infrastructure of the town. Tring roads are already in a poor state with potholes and uneven surfaces, and the public transport services are not adequate at present to cope with added volume of traffic/passengers. The car park at Tring station for example is already full to capacity most days. Plans to include cycle paths in the development are commendable but pointless considering the lack of maintained cycle paths through the rest of the town.

(16/09/18)

86 Beaconsfield Road - Why does the latest application still show a 3-storey (so-called 'two and a half') block of flats, towering over Tring Cemetery (and Donkey Lane), when the planning application states that "the council is seeking a buffer around the outskirts of Tring Cemetery to protect its setting"? This block of flats does not achieve this. A key development principle listed in the latest application is to "protect the green and open setting of Tring Cemetery, which is a locally listed historic park or garden". I do not understand why this block of flats still appears in

the plans.

I continue to object to this application on the grounds of increased noise and disturbance resulting from use and overlooking/loss of privacy.

(12/09/18)

53 Longfield Road - Cala's original plan was for 240 residential units and it is noted that the revised number is now 226. This still exceeds the guideline number for which Tring Council supported the application (~160). Heaven knows where the extra children will go to school nor the impact of the additional 500 plus cars on congestion in Tring's narrow roads. Whilst I still object to greenbelt land being built on in our area, I would withdraw my objection if the number of units are revised down to 160.

(12/09/18)

### **Comments on initial plans**

Applewood, Drayton Beauchamp, Aylesbury - Notwithstanding the principles of development outlined in policy LA5 for the site, the scheme fails to properly safeguard the setting of the AONB/Green Belt, and creates a hard and unsympathetic edge to the open space. The level of residential development is excessive and relies on the open space to make up its play provision needs. The submitted Planning Statement acknowledges that some harm will be caused to the AONB and this is worrying as it may well undermine the future special status of this land. The proposed NEAP with the play area also make development inroads on to the AONB. If approval is given it will be essential for adequate resources to be secured for a sustainable maintenance regime for the open space.

The layout of the residential elements of the scheme relies on a mixture of standard house types and has little design coherence or acknowledgement of the location, adjacent to the Chilterns AONB. The incorporation of rendered elevations does not help matters.

(31/05/18)

Lower Farm, Drayton Beauchamp - I am writing as a resident of Drayton Beauchamp to object to the planning application by Cala Homes. The increase in the number of houses from 180 to 240 is very worrying with no provision for infrastructure in Tring to accommodate the substantial increase in population and the number of vehicles on already congested roads.

Drayton Beauchamp's ancient single track village lane is a rat run and the prospect of the Cala development so close to the only exit onto the B488 an alarming situation.

We hope there will be a reduction in the number of dwellings and that the comments made by The Chilterns Conservation Board will be carefully considered.

(31/05/18)

Icknield Way, Drayton Holloway - I strongly object to 240 houses being increased from the original figure of 150 due to the: 1) inappropriate position of this site for 800-1000 people located on the wrong side of Tring to access all amenities; 2) blockages going to be caused by 600+ cars trying to get through Tring via double parked streets; 3) amount of increased traffic using the Icknield Way which is going to make it dangerous to turn in & on to if an exit for more industry plus an exit for 300+ cars is added (it is a key linkage road for ARLA tankers & aggregate lorries, queues lead into roundabouts at both ends at peak times, it's THE access

route for the Industrial estate, a very busy garage, farm traffic & 3 narrow residential roads leading into Tring's amenities & it's schools); 4) lack of detail on the quality of planting to hide the development from view to protect & respect the AONB & residents from noise & pollution. This historic market town will be ruined by ill thought through planning. Keep to 150 homes.

(30/05/18)

14 Bulbourne Road - I object to this application on the following grounds:

The infrastructure within Tring is already under great strain with schools and doctor's surgeries hugely over subscribed. The car park at the station is full every day and Tring does not have a full time police or fire service. The roads are in a terrible state and you can barely drive through the High Street without issues. How will the town cope with an additional 240 properties?

Lack of green space (which this development will lead to) is detrimental to both physical and mental health and it is very disappointing that neither the developer or council has considered this.

Why increase the number of properties to 240 with no explanation? This simply appears to be greed on the part of both the council and developers - unless there is an explanation to the contrary?

(30/05/18)

Cheyne House, Drayton Beauchamp, Aylesbury - As longstanding residents of Drayton Beauchamp we are writing to register our concern about the proposed development on the Upper Icknield Way.

The scale of the development and in particular the large increase in the number of dwellings over the original proposal is, we believe, likely to have a detrimental effect on our small and hitherto peaceful village which is set within an AONB.

Increase in traffic

We are particularly concerned at the increase in traffic through Drayton Beauchamp that this development will almost certainly incur. We are already used as a rat-run between the Lower and Upper Icknield Ways during rush hour and further traffic flows would be both disruptive and hazardous. The Holloway in particular is too narrow to accommodate larger vehicles and blind corners at the entrance to the village have in the past resulted in minor accidents.

Impact on resources

More generally we are concerned that the large increase in population that this development envisages does not take account of the existing provision of essential services, particularly schools and medical facilities.

(30/05/18)

Chiltern, Duckmore Lane - I object there is just not enough infrastructure to oxidase this many new homes.

(30/05/18)

128 Miswell Lane - Fully oppose this as infrastructure in Tring cannot support more houses.

(30/05/18)

14 Bulbourne Road - I'd like to object on the following basis;

The number of proposed dwellings has increased to 240 with no explanation as to why. I feel that this is simply greed on the part of the council and developers - unless anyone can explain to the contrary

The infrastructure in the town is already under huge strain. It can take weeks to get a doctor's appointment, the schools are fit to bursting, the station car park is constantly full, the increased traffic is damaging roads, we have no full time police or fire service - there is nothing in the plan to address these very serious issues and the impacts of large scale building.

Lack of recreational space is detrimental to people's health - both physical and mental. I am disappointed that neither the council or developer has seriously considered these issues.

Whilst I appreciate the need for housing, the implications that a development of this size will bring have not been fully considered and this is disappointing and irresponsible.

(30/05/18)

23 Okeley Lane - We wish to object to the planning application Ref 4/00958/18/MFA at LA5, Land at Icknield Way, Tring, Herts.

We would firstly like to express our concern that being a neighbour of the site we received no information regarding this application from Dacorum planning. This is despite registering previously for any future information regarding development of LA5.

We wish to make you aware of a number of strong objections we have with regards to the proposed development of 240 dwellings on this greenfield site. As an immediate neighbour to the site of the proposed development we are of the view that the development will have a serious impact on our standard of living. Our specific objections are as follows:-

- **Detrimental impact on residential amenities.**

**Master Plan for Local allocation LA 5 policy 6.22 The term 'focal buildings' relates more to the design of buildings rather than their height. Focal buildings should be located:**  
- in key frontages;  
-at the entrances to the settlement;  
-to mark prominent vistas; and  
-overlooking the green corridor in the centre of the development and the diverted public footpath in the northern area.

**Master Plan for Local allocation LA 5 policy 6.29 The new housing backing onto the existing houses in Okeley Lane should have longer than normal back gardens, in order to respect the privacy of these properties.**

**Master Plan for Local allocation LA 5 policy 6.41 Existing views into and out of the site should be retained as far as possible and opportunities taken to enhance these views (see photos 9 and 10 below). The landscape strategy, to be produced at the planning application stage, should give further consideration to enhancing existing views.**

We believe the proposed development does not respect the local context, in particular the scale and proportions of surrounding buildings. The proposed 2 and 2 1/2 storey high 'focal buildings' to the eastern boundary with Okeley Lane properties will have an adverse effect on the residential amenity of neighbours by reason of overlooking, loss of privacy (see point 2) loss of light and the right to enjoy a quiet and safe residential environment. We feel the

properties which back onto existing residential areas should be limited to two storey buildings and the design of the houses be accommodated to make them focal properties, rather than by height as detailed in the Master Plan. The 'Madeley' Design 2 1/2 storey buildings to the rear of Okeley Lane also have 2nd storey balconies which will directly face onto Okeley Lane properties. The use of these balconies at a raised height will further result in a severe loss of privacy through overlooking.

The orientation of our property is west facing which adds to the impact of the development, including loss of light. The gardens of Okeley Lane are approximately 16m in length. The master plan states the houses backing onto Okeley Lane should have longer than normal back gardens. In the planning application it states the properties backing onto Okeley Lane would have 'generous' gardens. This statement is vague without context.

In seeking clarification from the developer CALA homes they stated the minimum distance required between the window of one property to the window of another property is 21m. Therefore the proposed houses could be built 5m from our boundary. This would result in a severe loss of residential amenity of neighbours through loss of light, privacy and overlooking. The visual plans show gardens of longer length but as no clear measurements are given, we are very concerned with regard to how far these houses will be from our property for the reasons stated. To respect local context and the master plans recommendations these gardens should be significantly more than 5m away from our boundary, to ensure the houses are less overbearing and intrusive.

Views into the site from Okeley Lane are further reduced due to the 2 and 2 1/2 storey houses.

## **2) Loss of privacy and overlooking.**

### **Supporting Document Woods and Hardwick Topographic Survey May 17 File 44807124**

The proposed site of development rises in height from the eastern boundary. This means that the primary amenity of our garden, would be severely overlooked from the top rooms of the new development, especially the 2 and 2 1/2 storey properties with rear facing balconies at the second storey level. This would result in a serious invasion of our privacy. The proposed properties have direct facing large full height windows to the rear at 2nd storey level (with the balconies) and direct facing normal sized windows in the 2 storey properties. The 2 1/2 storey houses have direct facing dormer windows at the 2 1/2 storey level.

The design of the proposed properties does not afford adequate privacy for the occupants of Okeley Lane, with particular regard to their right to the quiet enjoyment of garden amenities. We would urge you to consider the responsibilities of the council under the Human Right Act in particular Protocol 1, Article 1 that states that a person has the right to peaceful enjoyment of their possessions which includes the home and other land. We believe that the proposed development would have a dominating impact on us and our right to the quiet enjoyment of our property. Article 8 of the Human Rights Act states that a person has the substantive right to respect for their private and family life. In the case of *Britton vs SOS* the courts reappraised the purpose of the law and concluded that the protection of the countryside falls within the interests of Article 8. Private and family life therefore encompasses not only the home but also the surroundings.

It is our view that the balconies, window size and window positions should be reconsidered to maintain privacy for residents of Okeley Lane.

## **3) Boundary**

### **Master Plan for Local allocation LA 5 policy 6.42 All the existing trees on the site should**

**be retained. Also, existing hedgerows should be retained and enhanced, particularly along the green corridor which will run through the middle of the development area.**

The developer proposes to erect a 1.8m Close Board fence between the properties of Okeley Lane and the new development. We are concerned that the placing of this fence on the boundary, on the plans, is unclear and may damage existing hedgerows which should be retained.

We attempted to gain clarification from the developer CALA homes but they replied that they would need to speak with the owners of each property in Okeley Lane bordering the development to plan erection of this boundary. The current boundary is a mixture of fencing, hedgerows and trees. We feel the hedge boundary should be retained and enhanced as stated in the Master Plan.

#### **4) Traffic in Tring**

**Master plan for Local allocation LA5 policy 5.9 The development must be brought forward based on a full recognition of the varying facets of sustainable development and minimising carbon emissions. As set out in the NPPF and in the Core Strategy, there are numerous components to sustainable development. In relation to master planning, particular attention should be paid to:**

- Minimising the need to travel.**
- Minimising pollution in all forms, including emissions and ground and surface water pollution and providing natural solutions to achieve this;**
- Minimising energy use through design including considering the orientation of properties at a detailed stage in order to maximise passive solar gain;**
- Protecting and enhancing biodiversity in layout and design;**
- Using land use planning and design to improve health and well-being, for example, encouraging exercise by easy access to open space, to encourage healthy eating, and ensuring well-designed neighbourhoods that reduce crime and the fear of crime; and**
- Integration of new communities with existing ones, maximising connectivity to shops and Tring Railway Station.**

**Master plan for Local allocation LA5 policy 6.69 A Transport Assessment will be required at the planning application stage. The applicant should enter into pre-application discussions with Hertfordshire County to agree the scope of the report. The assessment may point to the need for off-site highway improvements.**

As residents of Tring we are concerned about the increase in traffic from the site and its impact on local roads due to noise, pollution and safety. The design of the site means that traffic from the north side with access to Icknield Way will be required to use existing roads to access the town namely, Miswell Lane(which is very narrow), Christchurch Road(which has two schools) and Dundale Road(which is narrow near town centre and has a school entrance at Frogmore Street). We feel these roads are at risk of becoming 'rat-runs' due to the desire of new residents to access the town. We feel therefore that there should be access through the site to enable northern residents to access the southern exit to the site and Tring, without adding traffic to existing residential roads. Alternatively the northern exit could be made a left hand turn only exit so residents had to access Tring via main routes and not residential roads. We feel, although the development is planned to be sustainable, people by nature will use cars to access the town.

#### **5) Infrastructure Requirements**

**Master plan for Local allocation LA5 policy 8.9 The Council has identified the following infrastructure requirements which may need to be secured via a Section 106 agreement**

or provided from the receipt of a CIL payment

- Education contributions - for local primary school provision and other educational needs;

- Healthcare contributions – for local services as advised by NHS Hertfordshire/Herts Valleys Clinical Commissioning Group;

We wish to raise concerns regarding available school places and GP surgeries. Current residents of Tring are unable to secure primary places at schools closest to the site, namely Goldfield Infants School and Bishop Wood Junior School. The additional school places required, even if placed at other schools around Tring, would be some distance from LA5 and therefore would be likely to increase traffic on local roads. In addition the added population in Tring would require additional GP services.

## 6) Density of Development

***Master plan for Local allocation LA5 policy 5.1 The West of Tring site presents an opportunity to deliver around 180 to 200 homes and provide new cemetery capacity, open space and business premises. However, as stated in the Site Allocations DPD: “the net capacity figures specified provide an estimate of expected capacity and should not be treated as maxima. Final dwelling capacities will be tested through the planning application process, where detailed schemes will be expected to demonstrate compliance with specified planning requirements and other relevant policies and guidance.”***

We believe the current proposed development of 240 homes should be reduced to the original 180-200 homes proposed in the Master Plan. This would enable a greater amount of open space within the development which is already limited in Tring, reduce the housing density and reduce the impact of the development upon the surrounding areas of AONB.

## 7) Parking

The proposed development has an allocation of 617 parking spaces which averages as 2.57 spaces per property. In some areas of the development the allocation of parking per property is unclear. Plots 55,56,57 appear to have to share 6 spaces yet these are placed in a block of 2 by 3 which seems ambiguous that they will be shared equally and be easily useable. In addition the flats on the new development appear to only have one allocated space. Our concern is that parking in the future may spill onto the surrounding residential roads and the cemetery parking, especially as the majority of the homes are 4 bedrooms and families may have additional cars. The flats are also likely to have two occupiers. This has occurred in Tring with previous developments, such as flats located along Brook Street, where the overspill of cars is along the main road reducing space for the main carriageway.

In conclusion, we would also like to request that, should the application be approved, the council consider using its powers to enforce controlled hours of operation and other restrictions that might make the duration of the works (currently 5 years) more bearable. We would urge the council to ensure no construction staff access the site from the eastern boundary residential area to avoid inconveniencing neighbours.

We would be grateful if the council would take our objections into consideration when deciding on the application. We would welcome the opportunity to meet a representative of the planning department at our home to illustrate our objections at first hand.

(30/05/18)

35 Longfield Road - The plans still do not take into consideration the AONB sufficiently. We live in. Particularly beautiful area and the current plans will be detrimental to this. There are still no

plans for additional infrastructure in Tring. As stated by previous commentators there is little parking provision at Tring station and the bus service is not regular enough throughout the day to provide a convenient method of transport. The increase of traffic around west Tring will be considerable to very narrow roads which are always constrained by cars parked on both sides (Miswell lane) particularly during the school runs.

(30/05/18)

6 Chiltern Villas, Aylesbury Road - I am writing to oppose the detailed application presented to Dacorum Borough Council for the development of green field green belt land (LA5) to the West of Tring (Planning Application 4/00958/18/MFA).

I am opposed to the development of our green belt land for housing and industrial development and fundamentally opposed in this particular case where the development degrades what is already a very narrow remaining green field green belt zone. It is currently the last break in ribbon development between Aylesbury and Tring, and building here clearly compromises the primary purpose of green belt to prevent ribbon development. Building on green belt appears to run contrary to the Council's own Sustainable Development Strategy (2015) eg section 1.9, section 1.11 and 1.13. It also seems at odds with the clear guidance in the National Planning Policy Framework eg paragraphs 87,88 and 89. Perhaps of most concern is the apparent lack of alignment with the wider international Sustainable Development Goals (SDGs) that would give some reassurance that the special circumstances of this application have been carefully evaluated for long-term benefit to Tring and the new community proposed in this sensitive location. Does Dacorum require its developers to meet SDGs?

Overall this proposal runs against the Government's clear stated policy of protecting green belts in all situations unless there is an overriding reason for doing so. In this case I can't think what the overriding reason would be.

**I therefore find it very surprising indeed that this green belt land is even being considered for development and frankly astounded that proposals to build on it have managed to get this far down the planning process.**

However if the plan to build on green Belt does have Government approval (either directly or indirectly) then I believe we are obliged to proceed with great sensitivity and set out very clear criteria for development. This is a green belt green field site visible from the entire surrounding Chiltern Hills Area of Outstanding Natural Beauty. Unfortunately the development proposed is not really any different from any development that might be added to an existing town, failing to understand or recognise (or be informed by planners) over what would be acceptable or needed in this location. For me the proposed scheme, which (at 240 homes) is the equivalent of a new large village, is obviously a disproportionate addition in this part of Tring, and if built as proposed will be detrimental in a number of ways. Four things in particular stand out for me:

1 Average number of cars per home is likely to be 1.5 on a development of this type. At least 1 car per household will be exiting each morning to go to work. This will inevitably cause congestion and pollution at the one (currently not coping) westerly exit to the A41 and other routes to the west. The impact of additional traffic will need to be assessed, but the prospect of huge polluting queues of traffic up the Icknield way and up Aylesbury Road are a predictable (probably inevitable) outcome.

2 There are limited (some say no) spare school places in Tring. Where will the estimated 500 children go to school? Education provision is a critical consideration for all the people of Tring at the moment, let alone with an additional 500 places to find. I see no attempt to provide a new school for the children. The nearness of schools (both primary and secondary) are key attributes sought out by family-home buyers, so the idea of providing mostly family homes in

this application (without school provision) is a fundamental planning flaw. This will inevitably lead to further disruption of education in Tring and surrounding villages and yet further congestion on the roads as people struggle to get their children to schools in some as yet unspecified part of the County.

3 Flooding. I can see what look like SUDS (sustainable urban drainage) locations on the site, however the amount of hard standing and road surface will generate a large amount of water draining off towards Aylesbury Road. Drains on Aylesbury Road already surcharge when we have storms. Do we have to carry out a flood risk for the rest of Tring, as it is often the change in catchment area that causes new flooding where not encountered before. I hope this has been carefully considered.

74 Traffic congestion in the Town. Residents of the new development will have to get in their cars for every circumstance. To buy a pint of milk, get to the GP, get to school or go to the pub, meet friends. This will add to the existing congestion in the town and to levels of pollution. The lack of provision of local amenities for this proposed development is woeful, and it is regrettable that even the Planning Department has said these people can use existing amenities. There therefore needs to be a detailed environmental impact assessment to understand the impact of this development on air pollution levels in the town. These considerations highlight that the new development could have significant impact on the people of Tring (and indeed will be problematic for the new residents of the proposed development) and this (I think by definition) means that the size and scope of the proposal must be reconsidered.

### **The LA5 opportunity.**

I am not a NIMBY. However I am a BIMBY, and I fully support Prince Charles' initiative to encourage inspirational new housing developments. Many people (including me) fully accept the need for more housebuilding, but if we are to use this green belt land, how can we demonstrate to the people of Tring, Dacorum and maybe the Nation, how we should proceed sensitively and in a way that demonstrates how development can bring advantages for surrounding communities even on Green Belt land? LA5 seems to me to present a whole range of opportunities if we were able to spare it a little thought.

- a) How can we use it to demonstrate a clear vision of housing need?
  - b) How can we use it to demonstrate high standards of public engagement and inclusive decision making?
  - c) How can we use it to improve health and wellbeing?
  - d) How can this development be a powerful demonstration of energy efficient construction, low carbon renewable energy and minimal reliance on fossil fuels/reduction in GHG emissions?
  - e) How can we use it to improve biodiversity and a better understanding of the natural world, traditional Chiltern landscape and local heritage?
  - f) How can we use the opportunity of development to screen the inappropriate industrial development that was built along the Icknield Road many years ago, right up to the boundary of the Green belt (and degraded the green belt in the process)?
  - g) How can we avoid building a community that has inadequate infrastructure and amenities?
- By considering these questions it is interesting how a very powerful opportunity arises for Dacorum Planning on LA5. I hope I can interest you in the following ideas, which I believe are the kinds of considerations that might bring this scheme forward on a far better track.

**a) A clear vision of the housing needed** The proposed scheme seems to misunderstand today's housing needs and the demographic trends highlighted by the ONS. We should be focusing new housing on the needs of the only rapidly-expanding buyer group - the 55-75 age bracket (these are sometimes defined as 'empty-nesters') but will contain a large number of downsizer and relocater households who are mostly not wanting the traditional family-sized homes proposed for this development. This age bracket will increase by mabe 2.3 million over

the next 25 years, whereas the number of people in the 18-54 age bracket remain pretty static. By providing very pleasant smaller homes on the edge of Tring we could attract empty nester people of Tring away from their larger family homes, releasing those homes for families. This would be seen as a benefit to Tring society, rather than a challenge to our Town. I believe this current proposal is a restricted view of housing development, driven by the housebuilder (and understandably) to maximise profit. It is not driven by a desire to tailor housing to what is needed - that's something which we rely on the Planning community to deliver. I don't know how this development could have progressed this far on completely the wrong tack, but it certainly does raise questions for us all.

**b) Consultation** Tring Town Council and Dacorum Planning Department have not got together to discuss this detailed application with the people of Tring in a meaningful and interactive way, whereas a proper consultative charrette process should really have been conducted for a proposal of this size. Dacorum planning staff failed to attend the meeting held by Tring Town Council on 17 May (which presented the proposal) and this demonstrated a regrettable lack of interest in the views that might be expressed. As tax payers we deserve better than this from our planning team. I therefore call for a proper consultation on this detailed plan and to give local people the chance to properly interact with the planning experts to shape this proposal. Such a consultation should be detailed and genuinely receptive to local ideas and knowledge. By making the process inclusive Dacorum Planning has a chance to move onto a positive footing, and help to create a productive and collaborative relationship with the Tring jurisdiction as a whole. For this important proposal let's aim for winning an award on public consultation?

**c) Health and Wellbeing** This agenda has risen to the top of national housing debate with a Government APPG looking specifically at it. This site is a perfect opportunity to implement the best ideas and targets for health and wellbeing today. Just a few would include: places (gardens and communal spaces) for community interaction; opportunities to contribute to local projects; support for elderly; a local shop; good public transport; a sense of connection to the locality, and of course homes that have the features that contribute to wellbeing for the target buyers. We should aim to align with the Sustainable Development Goals framework (eg Targets in Goal 3) as recommended by key players in this field.

**d) Energy efficiency.** Here lies a great opportunity. Work with Savills indicates that downsizer households in particular are keen on energy efficient homes. If as suggested above, we were to build for these people in particular we could attract people committed to contributing to a showcase low carbon development. All homes could be all-electric and we should aim for a community PV array, as well as the highest standards of energy efficiency (eg close as possible to passivhaus standards). We should ensure that the homes are all equipped with the latest in battery technology so that the new development does not add to peak load on the grid. We should ensure that the new development is electric car only and all homes have charging points. Hence planning now for future needs, and demonstrating that new developments can be good for the environment and not contributing to global warming. This could be a development that is truly inspirational in this respect and aligned with SDGs 7 and 13, which better developers are already working to. What an opportunity for us all this would be.

**e) Improving biodiversity.** Here lies another great opportunity. Tring is the home of the Rothschilds and Miriam Rothschild was a pioneer nature conservationist who was active in the area. It would be a fitting legacy to turn (maybe half ) of the green area left after settling on the final number of homes) into a nature reserve (maybe in her name) and aim to establish this in future years as an SSSI, truly protecting it from future development and really giving people of Tring something to inspire old and young alike. The beauty of this idea is in encouraging residents of Tring (and particularly the active over-55s who might move in - who are natural candidates to help with the manangement of such a reserve) to remain fit and engaged. An obvious link with the health and well-being agenda. There would be education opportunities for young people and opportunities for intergenerational mixing. It would link with Tring's major

attraction - the Natural History Museum. Speaking with both the local naturalist trust (Herts and Middlesex Wildlife Trust) and the Woodland Trust could tap local expertise and ensure the plan was viable from the natural history point of view. It would avoid having misconceived plans over planting, such as the introduction of *Crocus sativus* (a non native). It would also give better ideas for screening (eg where is Yew in the tree mix), make sure that emblematic trees of the Chiltern (such as whitebeam, *Sorbus aria*) are included and highlight how we should group trees for maximum habitat value. It is notable that the list of trees currently shown around the perimeter is what is there already from natural regeneration. If the right cards are played it is possible that the conservation volunteer organisations could provide plans for planting and on-going management of the site. This interaction could help. Dacorum and Cala to be a little more informed over how to screen the final development from view. The name 'Tring' is thought to mean 'The slope with trees'. LA5 presents the Planning Department with a great opportunity to recreate this landscape effect (viewed from Aylesbury Road, maybe in a couple of places). The current plan fails to recognise this great opportunity, instead totally shielding the view of the slope by planting. Additionally we have an opportunity to recreate the grandeur of Chiltern hilltops. The survivors of a beech hanger remain at the top end of Tring to the South of Aylesbury Road. How splendid it would be if this could be recreated along at least part the Icknield Way, set back safely from the road. Such trees would also give us a little future proofing against overheating by providing a belt of evapotranspirational cooling on the windward side of town. There's sadly no plan for a community orchard that could be used to help conserve rare local apple varieties and no reference to an area for beekeeping to help balance the loss of pollinators in the area. It is a shame that such ideas are not brought forward into the mix in the proposal.

**f) Screening the existing industrial development.** No effort has been made to screen this from the surrounding countryside, though it has been there for decades (that's a poor track record). A wide belt of trees is needed to do this, with forest trees centrally positioned. Careful screening of these large buildings ought to be a pre-requisite, but is absent from the plans put forward. The idea of extending the industrial estate onto green belt needs to be rejected forcefully in my view, instead we should seek to place out of sight to the East of the current industrial estate, after conducting an evaluation of need.

**g) Lack of amenities/infrastructure.** Again if we consider occupation by the ideal target buyers (empty nesters) some of the key underlying infrastructure concerns evaporate. School places are no longer a concern. Traffic congestion at peak time is not an issue. All that is likely to be required is a small local shop. So the next step would be to see how the people of Tring feel about these proposals (or others of perhaps greater value or interest). Following that we might then need to look at the kinds of design that would be appreciated by future occupiers. I am optimistic that despite constraints there still lies at the heart of planning a duty to bear in mind future need and work to ensure that homes are appropriate for that need. I hope these ideas do contribute usefully to the consideration of this detailed application. I would be happy to call in to your offices to discuss any points or thinking in more detail. I have copied to James Doe as it is important that he is aware of the opportunities for LA5 and the importance of detailed public consultation in this particular and controversial case. If you and colleagues do not think that it will be possible to organise a charette to enable community engagement with the detailed application (the first time that we really can see the scale and nature of the development) please could you advise me. It is important that I am able to advise interested parties as soon as possible on the limited consultation opportunities available to the public in sensitive cases such as this.

(29/05/18)

6 Okeford Close - Tring cannot support this number of new houses. Schools, roads and doctor's surgeries will not be able to cope.

(29/05/18)

3 Nursery Gardens - Concerns re.

- over-development of the area
- ratio of 4 bedroom houses to much needed 3 bedroom family homes for working families
- traffic congestion in Tring High Street and Miswell Lane
- issues re parking in Tring and in particular at Railway Station
- issues relevant to Water usage
- issues regarding placement of waste bins for each habitation
- need for additional green spaces

(29/05/18)

6 Nursery Gardens - I object to the proposed scale and density of this development. The original proposal was for 180-200 dwellings and is now 240 with a suggested maximum of 250. I don't believe that Tring has the infrastructure to cope with a development this size. Properties are being squeezed into every available space and the schools and doctor's surgeries are already over subscribed. The station car park is already inadequate for the amount of commuters.

There seems to no mention of including any energy saving methods, such as solar panels, in the build. There is also no mention of including any measures such as hedgehog friendly fencing, bat boxes or swift 'bricks'.

I find it difficult to ascertain exactly how many parking spaces have been allocated to each dwelling and if there is storage space for 3 wheelie bins at each home.

Do we have any assurances that the majority of the CIL payment will be spent in Tring?

(29/05/18)

38 Longfield Road - The Master Plan for this site was promoted on the following basis:

- 150 new dwellings
- educational and community facilities (i.e. both buildings and space)
- extension of business park
- cemetery extension.

This was subsequently adopted by the authorities.

Last year, the Master Plan had a footnote added to say that 150 would increase to 180 - 200 new dwellings.

With no consultation nor explanation, this appears to have now increased to 240. Whilst no reasons were given as to the reasons why the Master Plan was initially increased to 180 - 200, it was generally accepted that such a range was the absolute maximum that could reasonably be achieved in this semi-rural location.

The increase to 240 is a step too far and completely unacceptable, as well as being totally out of character to its location.

The densities outlined in the D&A Statement are misleading as they include amenity spaces, wildlife corridors, public rights of way, etc. The scheme is far too dense and provides none of the community facilities referred to in the Master Plan.

This development and that approved on the former convent school would result in more than 270 new houses being concentrated on a small corner of Tring and on its traffic-challenged western gateway. This gateway already suffers because of the narrowness of Western Road particularly the stretches around its junction with Miswell Lane.

With the increased traffic generated by these developments, it would not be unreasonable for the Developer to contribute to improvements to ease traffic flow through Western Road and the High Street by way of a S.106 Agreement.

The original challenge for LA5 was heralded as being the creation of a place that would complement and enhance the west side of Tring and fit into the landscape - it fails miserably to do either and appear to ignore the stated contribution towards educational and community facilities (i.e. both buildings and space promised in the Master Plan).

The Application as it stands should be refused and the Developer requested to produce a new plan that fits the brief expressed in the Master Plan and one that includes some tangible benefits to Tring.

(29/05/18)

1 Langdon Street - The infrastructure in Tring doesn't really feel able to cope with these changes.

1, the Train station struggles with current demand. The carpark is full everyday, with a lot who use the bus or get a lift already.

2, As others have said it's increasingly hard to see a Dr.

3, can someone explain why when there was such concern over the original application that it's been deemed appropriate to increase the number of houses by 33%?

(28/05/18)

Flat 2, Acorn House, 104 High Street - My concern is regarding the lack of amenities and infrastructure in the town to support such a large development.

(28/05/18)

50 Lakeside - This is a total disregard for Tring how can this be increased so drastically. The developers are money grabbing thieves. I think this is an absolute disgrace . NO TO THE PLANNING

(28/05/18)

103 Miswell Lane - I write in relation to the above application. I am a local resident who does not object to an appropriate level of new housing being provided in Tring, consistent with the Core Strategy (2013) and Site Allocations (2017) documents; however, this needs to be accompanied by the appropriate level of infrastructure. This infrastructure needs to be available in a timely manner so that the necessary physical and social infrastructure is available when it is required.

This is particularly the case for LA5 as the application proposes 240 dwellings, in excess of the 180-200 set out in the Site Allocations document, and presumably, the figure which formed the basis of Dacorum's infrastructure planning.

The applicant proposes that any necessary increase in social infrastructure, for example schools and doctors' surgeries, is met through the CIL payment. It is however necessary for the local authority to be satisfied that the impacts of the development are acceptable, including those on existing services.

## **Policy background**

Planning applications should be determined in accordance with the Development Plan and having regard to other material considerations. These considerations include national policy in the NPPF and local considerations, such as design, traffic impact and impact on services.

The NPPF, in setting out the presumption in favour of sustainable development, emphasises the social role of the planning system in:

“supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being” (my emphasis)

The NPPF states:

“176. Where safeguards are necessary to make a particular development acceptable in planning terms (such as environmental mitigation or compensation), the development should not be approved if the measures required cannot be secured through appropriate conditions or agreements. The need for such safeguards should be clearly justified through discussions with the applicant, and the options for keeping such costs to a minimum fully explored, so that development is not inhibited unnecessarily.

177. It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan. Any affordable housing or local standards requirements that may be applied to development should be assessed at the plan-making stage, where possible, and kept under review.” (my emphasis)

Clearly it is therefore a joint responsibility on the applicant and Council to ensure that development proceeds with the necessary infrastructure to ensure that it is acceptable in planning terms.

## **Impact on schools**

With this in mind, I set out below Hertfordshire’s latest primary and secondary school forecasts for Tring. Primary schools are showing a significant shortage by 2020/21, around the time that the housing at LA5 will be delivered. It is also clear that this lack of capacity is quite localised to the west of Tring, with Grove Road and Dundale both being slightly under capacity for the past two years, but with Goldfield being consistently full. This is consistent with what we are seeing locally, with children living very close to Goldfield not being able to access a primary school within reasonable walking distance. I am concerned that consenting housing on LA5 without a clear plan for the delivery of new school places will add to this existing issue.

There is a much greater shortage identified for secondary provision. I understand that this is intended to be met through extending Tring School, but it is not clear how many new spaces will be provided and when they will be delivered.

17.2	TRING TOWN		2017/18 SUMMER INTERIM FORECAST - PRIMARY SCHOOLS 17-08-2017					
School No	SCHOOL	SCHOOL ADMISSIONS 2017	2015/2016 ACTUAL	2016/2017 ACTUAL	2017/18 FORECAST	2018/19 FORECAST	2019/20 FORECAST	2020/21 FORECAST
936	Bishop Wood C of E Junior	0	0	0				
938	Grove Road Primary	60	52	47				
939	Goldfield Infants' and Nursery	60	60	60				
940	Dundale Primary & Nursery	30	30	23				
	<b>Actual Number on Roll</b>		<b>142</b>	<b>130</b>				
	<b>Number of Reception Places Available</b>	<b>150</b>			<b>150</b>	<b>150</b>	<b>150</b>	<b>150</b>
	<b>Demand</b>				<b>150</b>	<b>155</b>	<b>157</b>	<b>161</b>
	<b>Surplus/Shortage</b>				<b>0</b>	<b>-5</b>	<b>-7</b>	<b>-11</b>
	<b>% Surplus/Shortage</b>				<b>0.0%</b>	<b>-3.3%</b>	<b>-4.7%</b>	<b>-7.3%</b>
	<b>No of FE</b>				<b>0.0</b>	<b>-0.2</b>	<b>-0.2</b>	<b>-0.4</b>

2017/18 SUMMER INTERIM FORECAST - SECONDARY								
17	TRING Total		2017/18 SUMMER INTERIM FORECAST - Secondary SCHOOLS 17-08-2017					
School No	SCHOOL	SCHOOL ADMISSIONS 2017	2015/16 ACTUAL	2016/17 ACTUAL	2017/18 FORECAST	2018/19 FORECAST	2019/20 FORECAST	2020/21 FORECAST
935	Tring	240	238	244				
	<b>Actual Number on Roll</b>		<b>238</b>	<b>244</b>				
	<b>Number of Year 7 Places Available</b>	<b>240</b>			<b>240</b>	<b>240</b>	<b>240</b>	<b>240</b>
	<b>Demand</b>				<b>258</b>	<b>254</b>	<b>250</b>	<b>273</b>
	<b>Surplus/Shortage</b>				<b>-18</b>	<b>-14</b>	<b>-10</b>	<b>-33</b>
	<b>% Surplus/Shortage</b>				<b>-7.5%</b>	<b>-5.8%</b>	<b>-4.2%</b>	<b>-13.8%</b>
	<b>No of FE</b>				<b>-0.6</b>	<b>-0.5</b>	<b>-0.3</b>	<b>-1.1</b>

The applicant has not provided an estimate of the child yield from their development. I would suggest that this is requested from them in order to understand the impact of the development, however, using the GLA calculator, the development would be anticipated to generate 77 no. pre-school children, 82 no. primary age children and 68 no. 11-17 year olds. This is clearly significant in the context of the existing shortages.

It is also relevant that the emerging Local Plan (which is still at issues and options stage) is proposing additional housing for Tring, potentially up to 2,430 new houses, mainly to the east of Tring. Depending on how much of this additional housing is planned for, this would place further strain on existing schools.

The July 2017 Dacorum Infrastructure Delivery Plan (IDP, extract below) recognises the need for 1 additional form of entry at primary school level and expansion of the secondary school in Tring to meet existing planned growth in the Core Strategy (not accounting for additional growth in the emerging Local Plan). There needs to be a clear programme for delivery before this housing is consented at LA5, particularly given that it is in excess of the allocated amount; or the consent needs to be conditional on this being in place.

A strategic approach is therefore needed to the planning of infrastructure and housing at LA5 should be contingent on having this delivered in a timely fashion.



## Other Services

The IDP notes that there are no recorded capacity issues at the GPs in the area. It is suggested that the applicant is asked to carry out an up to date assessment of this to demonstrate that the existing services meet planned demand, having regard to the additional number of homes proposed through this application. The same applies to leisure and other facilities.

## Summary

In summary, we do not object to the principle of housing in this location, however, we object to the application on the following grounds:

- The applicant has not justified that the additional housing proposed beyond the LA5 allocation is acceptable, having particular regard to impact on local services;
- 1. The applicant has not justified that there is a sufficient plan in place to provide the necessary additional primary and secondary school places, when required to meet the demand from the new homes;
- 2. The education authority appears to have no clear plan for the delivery of the additional primary school places and there is no programme or funding identified to meet this;
- The applicant has provided no assessment of impact on services at all, except for saying it will be met by the CIL payment – this is not acceptable for a development of this size.

I trust that the above will be taken into account and that the applicant will be requested to provide this information.

(24/05/18)

Goldfield Mill House, Miswell Lane - The proposal does not meet the core criteria for LA5, i.e. it is not around 150 homes but a proposal for 240 homes. A 10% margin on the core criteria would have been acceptable but a 60% increase is totally out of all proportion and if allowed through makes a complete nonsense of Council Planning Policy and the public consultation that brought it about. Basically, Carla would be driving a coach and horses through the democratic process and showing that the Council is totally powerless to enforce its own criteria.

(24/05/18)

33 Okeley Lane - We strongly oppose this Planning Application made by Cala Homes. We feel that the plans need to be re considered and alterations made to take into consideration the issues affecting not only the overall population in Tring but also the residents of Okeley Lane directly affected by the development like ourselves. We strongly oppose the fact that it will cause a loss of privacy, loss of sunlight, loss of view over the Chilterns AONB to our property which was one of the reasons we chose to buy our home.

(23/05/18)

39 Beaconsfield Road - 1) The original plan was for 180 houses. That has now been increased by 33% to 240. The development is too dense with too little consideration of the need for green space.

2) There is no evidence of proper planning for the already oversubscribed GP surgery and local schools. In recent years children from roads that are closer to the schools than the proposed development have been unable to secure places at Goldfield and Bishop Wood schools.

3) The extension to the cemetery seems sensible but I do not understand why in the plan it lies in the middle of the development and is detached from the rest of the cemetery. Why not extend the cemetery to the field at the end of Beaconsfield Road?

4) There are insufficient leisure facilities and those that are proposed focus only on young children rather than teenagers.

5) There are far too few parking spaces which will have implications for surrounding residential roads.

(22/05/18)

63 Beaconsfield Road - I object to the proposed plans for the following reasons:

- a vast increase in the number of properties (240 vs 150)

- poorly placed cemetery extension

- no clear plans to improve local infrastructure to cope with the number of people & children (schooling, buses, car parking in Tring, car parking at station)

- poorly located play provision

- inadequate parking provisions which will result into overflow into existing roads

- a lack of appropriate public engagement with the consultation meeting not even being held in Tring!

(22/05/18)

40 Beaconsfield Road - Unfortunately, the present infrastructure in place for the current population of Tring is insufficient. The schools, doctors surgeries, car parks etc are struggling to cope. Increasing the population will only compound the problem.

The £3m investment that has been mentioned would barely scratch the surface to improve the conditions as they are now.

(22/05/18)

4 Landon Street - 1) The Government's latest planning policy is to strengthen protection of the

Greenbelt and instead opt to build on brownfield sites. I do not believe that brownfield sites have been properly examined as an alternative option or that the Greenbelt is being protected as per the Government's aims

2) Tring's resources are already overstretched. I know of parents who did not get their first school choice this year due to over-subscription, despite living within a few hundred metres of the school. We had to wait a fortnight to get a doctor's appointment to see our son this month.

3) It seems ill-advised to build this side of town. A lot of people commute from Tring to London and anyone who commutes from these houses will have to cross the town to get to the station, adding to rush hour traffic. Regarding commuting, the station car park is already full to capacity

4) Why is additional employment space needed? The majority of office space in the Akeman business park is unlet

(22/05/18)

71 Beaconsfield Road - I object to this planning application for following reasons;

1. Blocks of flats not appropriate in this area of Tring and in any case not evenly spread through out site.

2. 240 dwellings is too many. 180 - 200 better as previously planned. (I accept that more homes are needed, but feel greed motivates the current application)

3. New cemetery site should be to north of current cemetery, providing Beaconsfield residents with some green area.

5. Not enough parking. Fear overflow will use top of Beaconsfield Road.

4. Infrastructure not able to cope with large numbers of extra people. Local schools/doctors over-subscribed.

5. No properties planned to allow for downsizing of older residents eg bungalows or smaller houses. Similarly for individuals or young couples to buy.

7. Oakley Lane residents need consideration as to their boundaries and being overlooked. Great concern here.

8. Eastern side of development should be less dense to mitigate impact on current residents of existing roads.

(22/05/18)

43 Okeley Lane - My concerns are twofold: Firstly concerning the specific plans submitted and secondly regarding the impact and strain the considerably larger development will have on the infrastructure of Tring. (CS23)

The Proposed Plans

There is no proposed route between the north and south of the development. According to Cala Homes this was specified to them because Decorum did not want a 'rat run' through the development. This means that all residents of the development to the north of the open ground wanting to drive to town will come out on to Icknield Way and use either Miswell Lane or Christchurch Road to travel south into town thereby turning both those roads into 'rat runs'. Miswell Lane is already a perilous route: Cars travel down it too fast, parked cars obstruct vision, children cross to the park or to school up and down the length of the road. Christchurch Road has less parked cars and will invite drivers, as it currently does, to speed. Again this road is used by children at all times of the day. I cannot imagine that Decorum would imagine this an acceptable situation.

The decision to have less density of building on the western edge of the development is bizarre. The land beyond may be an area of outstanding natural beauty but, contrary to the statement in the master plan, the western edge of LA5 is barely visible from any of the roads approaching Tring. Indeed this edge of town would only be visible from the air. Surely this being the case this is the area that should be more dense because it would afford more people

the opportunity to enjoy the area of standing natural beauty from their windows. If you look at the previous border where the greenbelt ended and Okeley Lane begins there was no such aesthetical consideration. The houses along Okeley Lane formed a hard border which has been perfectly acceptable. Especially considering that the view from Icknield Way entire compasses both houses and industrial estate. Strangely there is no such density consideration to the properties along the Icknield Way approach which actually is visible from the road.

The current plans are not clear about the proposed distance between the new development properties and existing properties in Okeley Lane. The distance being proposed is described as 'generous' but we are told by Cala that they will probably be working to the statutory minimum of 21m. I believe that this will severely impact on the privacy of residences such as mine. However, I have a suggestion that I would ask you to give some serious consideration. There is an open space planned with the play area in the centre of the development. Could this possibly be located along the eastern side of the development i.e. along the backs of the Oakley Lane properties. This would not only allow for a less intrusive development but would also allow for excellent opportunities for integration between the new community and the existing community. This would be a fantastic place for the children on this side of Miswell Lane to meet up and play. The current positioning of the open space in the middle of the development makes it exclusive from the existing community.

Lack of community based facilities.

This development will increase the population of Tring by approximately 8%. I am not sure how many households are or will be to the west of Miswell Lane but I can tell you there are no shops, no community centres, no pubs or cafes to provide service or heart to this area. The master plan originally proposed 150 dwellings which increased to 180 to 200. The impact and needs of 240 dwellings will be far greater. If there are no local shops all these households will be driving to the shops putting huge strain on the already overcrowded roads of Tring.

I notice that the map of facilities in the master plan omits to show the small corner shops situated on the eastern side of Tring in Chiltern Way and Wyngrave Road and the Co-op next to the community centre on Silk Mill Way. Providing an element of shopping facilities would alleviate some of the requirement for car journeys. Please remember that it may only be 11 minute walk from Okeley Lane to the nearest shops but it is uphill all the way back carrying any quantity of shopping is unfeasible. What consideration has been made for older residents? The shop on Miswell Lane also charge considerably more for the goods and have a limited range insufficient for supporting a family.

Cemetery

Cala say that they have split the cemetery because that is what Dacorum have asked them to do. Surely that request was made when the proposal included a traveller site now that the traveller site is no longer planned surely the cemetery should be expanded adjacent to the existing site. Splitting the site will mean that families who have been interred together for many years will now have to be separated by a housing estate. I know this grieves a number of Tring's older residents.

The infrastructure

Cala say they are providing 628 spaces for parking. Even if each property has an average of just 1.5 cars we are looking at an additional 350 cars on Tring roads. Tring High Street can barely support the traffic that is on it. One van delivery, one funeral, one postal collection and the entire High Street grinds to a halt.

We have no police station in Tring. What provision will be made for extra policing?

We have just one petrol station - Which already causes jams when cars are queueing to get in.

#### Impact on schools

I have seen the population birthrate projections for Dacorum. They are not declining they are expected to increase steadily, above the county and national average, up to to 2039. Contrary to what Dacorum say about there being spaces in our schools we have heard directly from governors of Junior schools and the business manager of Tring school that they are not able to increase the number of pupils they can take and that they have no space or funds to expand. Every single Tring school is turning away pupils - even before the new development. The governors from Bishop reported that they are planning to restrict their catchment area to exclude Okeley Lane by 2019. Where are the new children going to go to school? Families on Miswell Lane are already being refused places from both Bishop Wood and Goldfield. I fear that the statement in the master plan that Tring school is able to expand is not true. County do not want expansion and according to the business manager Tring school they have no plans to expand their intake merely their facilities.

Dacorum representatives were conspicuous by their absence at the town council meeting on Thursday of last week. We are being expected to have faith that the infrastructure will be put in place. It is difficult to have faith when we have a very clear example of broken faith in Pitstone where the same promises were made with regards the Castlemead development.

I respectfully request that you reject this plan at this time both for its inherent design flaws and for the simple fact that Tring cannot cope at this time with educating, policing and transporting this increased population.

(22/05/18)

80 Beaconsfield Road - Attached documents mention "create attractive residential neighbourhood/meadows" Current residents should also be considered. Keep the field/meadow at end of Beaconsfield/Highfield Rd & less dense housing backing onto Oakley Lane

A lot of infill/pockets of new housing in Tring, surely these should contribute to housing quota thereby reducing No. homes for LA5

Tring is a very small town. It's impossible to park in town on market day & delivery vans on High St already cause gridlock & reduced air quality in town. 240 homes is massive pressure on the town

Apparently Herts CC indicated there is enough school capacity for LA5. We need transparency on this. These spaces will probably be in villages, hardly promoting sense of community in Tring. My child didn't get into Goldfield & CC allocated Long Marston, she finally got in when a family left Tring!

Total Consulted No. of 117 is VERY low!

(22/05/18)

37 Beaconsfield Road - I am concerned that the number of houses has increased from 180 to 240 - a 33% increase to the original proposal.

The Tring infrastructure is already straining at the seams - its almost impossible to get through the High Street with the volume of traffic. Schools are already to capacity, there are no banks in the town, car parks are often full and Tring Station Car park can't cope with the current

requirements - it is full after 8.30 in the mornings.

With the increase in houses planned, the allocated parking on the development is not adequate for the number of houses. Given that a large majority of households have more than 1 car this will put added pressure on adjoining roads to supply parking for the overspill. I would like to see the reduction of planned houses, an increase in parking spaces and plans for the improved town infrastructure to cope with the increase in new residents.

(22/05/18)

26 Icknield Way - My concern with this application is the overall impact on Tring in terms of amenities and traffic. The Schools in Tring are full and oversubscribed in some cases, and there is no explanation as to how the new residents of these proposed houses will be accommodated. I am also concerned about the amount of traffic that will increase on Icknield Way and around Tring.

(22/05/18)

23 Beaconsfield Road - I am writing to express my objections to the LA5 development which is proposed for Tring, Herts.

I have several concerns about the proposed development :

- the density of houses on the site up from 180 to 240 – this could mean a potential additional 800-1000 residents using Tring facilities ie schools, local doctors surgeries, and dental practices which are already under pressure.
- the number of parking places is inadequate for such a large development. I live on Beaconsfield Road, and am worried that should inadequate parking be planned for the development then there is nothing to stop residents of the new site to park on our road should a pedestrian cut through be included en route to the town centre – which would follow along Beaconsfield Road. The traffic this side will also increase which is concerning on already busy roads. More traffic will just compound the problem of traffic on an already very congested Miswell Lane/Beaconsfield Road. I do hope that road access will not be allowed from the new site through Beaconsfield or this estate. *Indeed I would like to request that planners consider the extension of the cemetery which would create a barrier between the Beaconsfield Road/Highfield Road estate and the new development should it go ahead.*
- Inadequate planning for the local infrastructure including the GPs and local schools. This is the second time in the last few years that a child on Beaconsfield Road has been unable to secure a place at Goldfields for reception and yet we are a 5-7 minute walk from the school.
- Insufficient leisure facilities. Are there adequate facilities for the community ie hall/café/playgrounds/shop which would put less pressure on the small town of Tring where parking is a problem. A decent size playing field/skate park for older children would be ideal. There is currently only a playing field this side of town and no facilities for teenagers/older children.

(22/05/18)

Rose Bank, Donkey Lane - We should like to register our concerns about the proposed hybrid planning (reference number above) for 240 dwellings.

The council appear to have given little thought to the infra structure required to support this

development. All the Primary schools in Tring are already at capacity with little or no room for extensions. Doctors surgeries are also overwhelmed with the current number of patients on their books and the local roads are going to be more congested than they are at present with the extra volume of traffic.

The CALA plans show the greatest density of housing to the east of the site. There needs to be more thought given to the distribution of the new homes. If buildings are being kept away from the east due to them bordering the AONB then perhaps the density should be centred and phased outwards.

What measures have the council taken to ensure the plans to keep many trees and the hedgerows are enforced?

Finally CALA show a proposed cycle track going down Donkey Lane instead of the existing public footpath. I should like to point out that the council only own the top of Donkey Lane. The track from outside the two bungalows to the Aylesbury Road is owned by ourselves and Woodside. A letter has already been sent to the council and an objection made to CALA at their presentation meeting in Wigginton. We think this proposal too dangerous. The footpath is well used by dog owners amongst others and we already have to take great care when reversing off our drive. Speeding cyclists would be far too hazardous. We also believe you need our permission to change the land usage.

I also am an owner of Rose Bank. I am particularly concerned about the AONB and the flora and fauna that live there. The hedgerows and trees must be protected properly ...no trimming ...or 'tidying up'. These hedges are teeming with life.

Also a cycle track is completely unsuitable for Donkey Lane ..indeed at present most cyclists go across to the Aylesbury Road from Icknield Way on the other track that comes out opposite the private road to Drayton Manor. That's because it makes sense- as that's where the public byway is already.

Tring 's infrastructure is woefully inadequate to support so many more people/cars/children.

(22/05/18)

Drayton Holloway, Icknield Way -

(22/05/18)

80 Beaconsfield Road - The West side of Tring has a poorer access to the town's resources compared to the East side (school places, supermarket). So any development at LA5 should be at the lower initially proposed level of 180 houses . If the council's plan is to send the excess children to spare places at village schools, then the new houses should be developed in the villages rather than in Tring

- All the houses are family houses, whereas there should be a mix of houses to cater for the ageing population - a proportion of bungalows should be provided
- the proposal to go from less dense housing in the West of LA5 to more dense housing in the East of LA5 ignores the interests of existing residents. The opposite where there is less dense housing in the East would have less detrimental impact on existing residents
- Better to keep the existing mature landscape/meadows such as the field at the end of Beaconsfield Rd rather than manufacturing some artificial green spaces, which all residents old & new can enjoy

(21/05/18)

54 Beaconsfield Road - At the recent Town Hall meeting in Tring, councillors said that we could raise the concerns we have over the LA5 Hybrid proposal directly with you. I am writing to raise my concerns, and object to the proposal on the following grounds:

1. Housing density

The original LA5 land proposal was for 150 houses. This went up to 180-200 when the plan last went out for consultation. 240 are now proposed. As the land involved has remained the same, this can only be achieved by increasing the density of housing.

2. Infrastructure

There was concern over how the infrastructure of this area would cope with 150 new households, let alone 240. There seem to be no concrete plans on how to deal with the extra numbers that will use the roads, health facilities, schools etc.

3. Location considering the number of households involved

LA5 is situated at the western most point in Tring. In terms of access to the train station at the eastern end of town, surely the location goes against current environmental objectives of cutting the need for car use?

4. Lack of a through road in the new estate

I understand from previous discussions with the developer that the Highways Authority is concerned to avoid a rat run through the development. I appreciate that but the result will be that the closest through road for those living in either the north or south part of the area will be Miswell Lane. Miswell Lane is already under pressure from traffic. Rather than make life harder for existing residents in the area, might an alternative not be to design a through road in the development on the lines of Windmill Way maybe, so cars have to drive slowly.

5. The plans for the top of Beaconsfield Rd

I was reassured in looking at the original LA5 proposal to see that the plan showed a green urban wildlife corridor running along Donkey Lane and then along the top of Beaconsfield Rd (page 30 LA5 Master Plan V3 2014). There is also an arrow at the top of Beaconsfield saying 'Glimpses of the site'.

In the current plans, 'glimpses of the site' is certainly not an apt description if I read the plans correctly. The green corridor seems to have gone. Instead we have a block of flats at the top of the hill, with only 9 parking spaces.

Beaconsfield Rd is a quiet road of two storey houses and bungalows. The plan is out of character with the road. There is also a danger that Beaconsfield Rd will become an overspill parking site.

Conclusion

To sum up, I accept the need for more housing but believe the number of households should stay at 180, the development should be designed to stand alone without having a negative impact on the local residents, and concrete plans are needed on how the infrastructure will be adapted to allow for greater number of residents in the area.

(21/05/18)

17 Okeley Lane - The original proposal for LA5 was for 150 then 180 – 200 houses. Cala's proposal is for 240 houses. This has resulted in the proposed plan 'cramming' the site due to half of the proposed area being AONB. This has been exacerbated by the council request that the development has a soft edge to the ANOB (information from Cala at the recent Tring

council meeting). If the council required a soft edge to the ANOB then they should not have delisted the area from the green belt!!

This decision has resulted in a large number of properties being crowded behind the houses in Okeley Lane (where we live) meaning that we will have a 1.8m fence at the end of our garden and the new houses only 21m from our back door. As the topography of the field rises away from our houses this means that these new houses will be looking directly into our bedroom windows and we will have no privacy in our back garden. This is despite our request for Cala to change the arrangement at their presentation in December. If any councillors or developers were prepared to come and look at things from our side of the fence then they would understand our frustration, anger and distress at what is happening to our privacy and lovely view. This is further exacerbated by the proposed properties in this area of the proposed development being 2 and a half stories high – again no thought for the existing residents. Additionally with the houses being this close we will be subject to high levels of noise and light pollution that we do not currently have.

Nobody appears to have considered the effect of the development and additional population on the facilities in Tring. These are already struggling to cope with the existing population. In particular the schools are oversubscribed at all levels with a number of our young people appealing for places each year. It is also difficult to get doctors' appointments and town parking is regularly at capacity. How will the additional population that this proposed development would cause be catered for? The northern part of the site will exit the development onto the Icknield way and then their main route into Tring will be via Miswell Lane or Christchurch road, both of which are already congested and dangerous for pedestrians and drivers alike.

At no time has Tring town, Dacorum or Hertfordshire council showed any compassion or interest at our plight. At best they have been negligent, at worst secretive and manipulative. My presumption is that by keeping us in the dark, the council and Cala will be able to jointly force the delisting of the green belt and the building of this wholly inappropriate development. In particular information regarding the development has been difficult to obtain and the communication from the council has been poor. As an example, we were told at the Tring town council meeting that 4 notices have been put around the site. Firstly, this is inadequate notification, not even posting at all access areas to the site. And secondly these notices are wrapped tightly around sign posts so difficult to read even if you can find them!!

Lastly some of the information the developers are supplying is inaccurate. Whilst a minor point there is clear evidence of badgers using the site whilst Cala and the council have both put out material saying the exact opposite. Again this behaviour only strengthens my believe that both organisations are manipulating the information to their benefit and does not add any level of confidence that the planning process is open and fair.

(21/05/18)

38 Beaconsfield Road -  
(21/05/18)

35 Okeley Lane - Infrastructure - Tring primary & secondary schools don't have any spaces & there are no plans for the secondary school to expand.

The doctors' surgery is already struggling to service the current population of Tring. It will not be able to cope with increased demand.

Increased traffic on Miswell Lane which is clearly not wide enough.

Two and a half storey houses that back onto Okeley Lane will seriously impact light and view as the site slopes upwards. Can these be relocated?

Affordable housing on north (Ickniel Way) side of the site is in 2 areas only & not dispersed as described in the planning. Can the affordable houses that back onto Okeley Lane be relocated as there are already two blocks of affordable flats in this area?

5 bedroom property is just metres away from the back gates of 3 & 5 Okeley Lane. This will seriously impact the light & view. Can this be moved?

Please confirm the exact location of the 1.8m fence behind the current properties on Okeley Lane.

(21/05/18)

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5 bedroom property is just metres away from the back gates of 3 & 5 Okeley Lane. This will seriously impact the light & view. Can this be moved?

Please confirm the exact location of the 1.8m fence behind the current properties on Okeley Lane

(21/05/18)

2 Grace Villas, Park Road - I would like to object to this application on the basis that there does not appear to be a clear plan from Dacorum and Herts County Council for the town to support the new build and the influx of new residents. The construction of 240 new homes will have the potential to bring 1000 new residents to Tring, a town that is already short on school spaces, lacking in public transport, GP surgeries that are very busy and roads that are already over trafficked. For a development of this size to be seriously considered there needs to be a clear plan presented to the existing residents of the town as to how the governing bodies intend to invest in the town and support this.

It is to be believed that as a result of the development CALA homes will be required to pay Dacorum approximately £3million for planned future projects and development. It has been quoted that Regulation 123 created by Dacorum outlines how such money will put back in to the borough, worryingly this regulation does not mention Tring and under the section regarding expansion to schools only developments of 500 or more houses will result in consideration for school expansion, LA5 does not meet this. How is it right that a town has to accept a development of this size without any sort of support plan? This should be in place prior to commencement of the development.

The town is currently overrun with vehicles parking on any street they can, yet there is no plan for more parking to support more vehicles as a result of the development. The bus service to

the train station is intermittent and there is no plan to expand the already packed station car park. There are minimal designated cycling routes through the town, therefore not discouraging people from using cars. This coupled with my previous points lead to what feels like a poorly planned development that is only detrimental to the town and its existing residents.

(21/05/18)

23 Okley Lane - We wish to object to the planning application Ref 4/00958/18/MFA at LA5, Land at Icknield Way, Tring, Herts.

We would firstly like to express our concern that being a neighbour of the site we received no information regarding this application from Dacorum planning. This is despite registering previously for any future information regarding development of LA5.

We wish to make you aware of a number of strong objections we have with regards to the proposed development of 240 dwellings on this greenfield site. As an immediate neighbour to the site of the proposed development we are of the view that the development will have a serious impact on our standard of living. Our specific objections are as follows:-

### **3. Detrimental impact on residential amenities.**

**Master Plan for Local allocation LA 5 policy 6.22 The term ‘focal buildings’ relates more to the design of buildings rather than their height. Focal buildings should be located:**

- in key frontages;
- at the entrances to the settlement;
- to mark prominent vistas; and
- overlooking the green corridor in the centre of the development and the diverted public footpath in the northern area.

**Master Plan for Local allocation LA 5 policy 6.29 The new housing backing onto the existing houses in Okeley Lane should have longer than normal back gardens, in order to respect the privacy of these properties.**

**Master Plan for Local allocation LA 5 policy 6.41 Existing views into and out of the site should be retained as far as possible and opportunities taken to enhance these views (see photos 9 and 10 below). The landscape strategy, to be produced at the planning application stage, should give further consideration to enhancing existing views.**

We believe the proposed development does not respect the local context, in particular the scale and proportions of surrounding buildings. The proposed 2 and 2 1/2 storey high ‘focal buildings’ to the eastern boundary with Okeley Lane properties will have an adverse effect on the residential amenity of neighbours by reason of overlooking, loss of privacy (see point 2) loss of light and the right to enjoy a quiet and safe residential environment. We feel the properties which back onto existing residential areas should be limited to two storey buildings and the design of the houses be accommodated to make them focal properties, rather than by height as detailed in the Master Plan. The ‘Madeley’ Design 2 1/2 storey buildings to the rear of Okeley Lane also have 2nd storey balconies which will directly face onto Okeley Lane properties. The use of these balconies at a raised height will further result in a severe loss of privacy through overlooking.

The orientation of our property is west facing which adds to the impact of the development, including loss of light. The gardens of Okeley Lane are approximately 16m in length. The master plan states the houses backing onto Okeley Lane should have longer than normal back gardens. In the planning application it states the properties backing onto Okeley Lane would have ‘generous’ gardens. This statement is vague without context.

In seeking clarification from the developer CALA homes they stated the minimum distance required between the window of one property to the window of another property is 21m. Therefore the proposed houses could be built 5m from our boundary. This would result in a severe loss of residential amenity of neighbours through loss of light, privacy and overlooking. The visual plans show gardens of longer length but as no clear measurements are given, we are very concerned with regard to how far these houses will be from our property for the reasons stated. To respect local context and the master plans recommendations these gardens should be significantly more than 5m away from our boundary, to ensure the houses are less overbearing and intrusive.

Views into the site from Okeley Lane are further reduced due to the 2 and 2 1/2 storey houses.

## 2) Loss of privacy and overlooking.

### **Supporting Document Woods and Hardwick Topographic Survey May 17 File 44807124**

The proposed site of development rises in height from the eastern boundary. This means that the primary amenity of our garden, would be severely overlooked from the top rooms of the new development, especially the 2 and 2 1/2 storey properties with rear facing balconies at the second storey level. This would result in a serious invasion of our privacy. The proposed properties have direct facing large full height windows to the rear at 2nd storey level (with the balconies) and direct facing normal sized windows in the 2 storey properties. The 2 1/2 storey houses have direct facing dormer windows at the 2 1/2 storey level.

The design of the proposed properties does not afford adequate privacy for the occupants of Okeley Lane, with particular regard to their right to the quiet enjoyment of garden amenities. We would urge you to consider the responsibilities of the council under the Human Right Act in particular Protocol 1, Article 1 that states that a person has the right to peaceful enjoyment of their possessions which includes the home and other land. We believe that the proposed development would have a dominating impact on us and our right to the quiet enjoyment of our property. Article 8 of the Human Rights Act states that a person has the substantive right to respect for their private and family life. In the case of *Britton vs SOS* the courts reappraised the purpose of the law and concluded that the protection of the countryside falls within the interests of Article 8. Private and family life therefore encompasses not only the home but also the surroundings.

It is our view that the balconies, window size and window positions should be reconsidered to maintain privacy for residents of Okeley Lane.

## 3) Boundary

**Master Plan for Local allocation LA 5 policy 6.42 All the existing trees on the site should be retained. Also, existing hedgerows should be retained and enhanced, particularly along the green corridor which will run through the middle of the development area.**

The developer proposes to erect a 1.8m Close Board fence between the properties of Okeley Lane and the new development. We are concerned that the placing of this fence on the boundary, on the plans, is unclear and may damage existing hedgerows which should be retained.

We attempted to gain clarification from the developer CALA homes but they replied that they would need to speak with the owners of each property in Okeley Lane bordering the development to plan erection of this boundary. The current boundary is a mixture of fencing, hedgerows and trees. We feel the hedge boundary should be retained and enhanced as stated in the Master Plan.

#### 4) Traffic in Tring

**Master plan for Local allocation LA5 policy 5.9** The development must be brought forward based on a full recognition of the varying facets of sustainable development and minimising carbon emissions. As set out in the NPPF and in the Core Strategy, there are numerous components to sustainable development. In relation to master planning, particular attention should be paid to:

-Minimising the need to travel.

-Minimising pollution in all forms, including emissions and ground and surface water pollution and providing natural solutions to achieve this;

-Minimising energy use through design including considering the orientation of properties at a detailed stage in order to maximise passive solar gain;

-Protecting and enhancing biodiversity in layout and design;

-Using land use planning and design to improve health and well-being, for example, encouraging exercise by easy access to open space, to encourage healthy eating, and ensuring well-designed neighbourhoods that reduce crime and the fear of crime; and

-Integration of new communities with existing ones, maximising connectivity to shops and Tring Railway Station.

**Master plan for Local allocation LA5 policy 6.69** A Transport Assessment will be required at the planning application stage. The applicant should enter into pre-application discussions with Hertfordshire County to agree the scope of the report. The assessment may point to the need for off-site highway improvements.

As residents of Tring we are concerned about the increase in traffic from the site and its impact on local roads due to noise, pollution and safety. The design of the site means that traffic from the north side with access to Icknield Way will be required to use existing roads to access the town namely, Miswell Lane(which is very narrow), Christchurch Road(which has two schools) and Dundale Road(which is narrow near town centre and has a school entrance at Frogmore Street). We feel these roads are at risk of becoming 'rat-runs' due to the desire of new residents to access the town. We feel therefore that there should be access through the site to enable northern residents to access the southern exit to the site and Tring, without adding traffic to existing residential roads. Alternatively the northern exit could be made a left hand turn only exit so residents had to access Tring via main routes and not residential roads. We feel, although the development is planned to be sustainable, people by nature will use cars to access the town.

#### 5) Infrastructure Requirements

**Master plan for Local allocation LA5 policy 8.9** The Council has identified the following infrastructure requirements which may need to be secured via a Section 106 agreement or provided from the receipt of a CIL payment

- Education contributions - for local primary school provision and other educational needs;

- Healthcare contributions – for local services as advised by NHS Hertfordshire/Herts Valleys Clinical Commissioning Group;

We wish to raise concerns regarding available school places and GP surgeries. Current residents of Tring are unable to secure primary places at schools closest to the site, namely Goldfield Infants School and Bishop Wood Junior School. The additional school places required, even if placed at other schools around Tring, would be some distance from LA5 and therefore would be likely to increase traffic on local roads. In addition the added population in Tring would require additional GP services.

#### 6) Density of Development

**Master plan for Local allocation LA5 policy 5.1 The West of Tring site presents an opportunity to deliver around 180 to 200 homes and provide new cemetery capacity, open space and business premises. However, as stated in the Site Allocations DPD: “the net capacity figures specified provide an estimate of expected capacity and should not be treated as maxima. Final dwelling capacities will be tested through the planning application process, where detailed schemes will be expected to demonstrate compliance with specified planning requirements and other relevant policies and guidance.”**

We believe the current proposed development of 240 homes should be reduced to the original 180-200 homes proposed in the Master Plan. This would enable a greater amount of open space within the development which is already limited in Tring, reduce the housing density and reduce the impact of the development upon the surrounding areas of AONB.

## **7) Parking**

The proposed development has an allocation of 617 parking spaces which averages as 2.57 spaces per property. In some areas of the development the allocation of parking per property is unclear. Plots 55,56,57 appear to have to share 6 spaces yet these are placed in a block of 2 by 3 which seems ambiguous that they will be shared equally and be easily useable. In addition the flats on the new development appear to only have one allocated space. Our concern is that parking in the future may spill onto the surrounding residential roads and the cemetery parking, especially as the majority of the homes are 4 bedrooms and families may have additional cars. The flats are also likely to have two occupiers. This has occurred in Tring with previous developments, such as flats located along Brook Street, where the overspill of cars is along the main road reducing space for the main carriageway.

In conclusion, we would also like to request that, should the application be approved, the council consider using its powers to enforce controlled hours of operation and other restrictions that might make the duration of the works (currently 5 years) more bearable. We would urge the council to ensure no construction staff access the site from the eastern boundary residential area to avoid inconveniencing neighbours.

We would be grateful if the council would take our objections into consideration when deciding on the application. We would welcome the opportunity to meet a representative of the planning department at our home to illustrate our objections at first hand.

(21/05/18)

21 Okeley Lane - I wish to object most strongly at the latest incarnation of the LA5 planning application in Tring. This would have a 3 story block some 20 something metres from the rear of my house. As the land rises slightly up from my property up to the current field this new block would tower over me and be really intrusive looking down into my garden, living room and bedrooms. This is totally unacceptable. At the recent Tring Town Council meeting the representative from Savill's kept saying 2 1/2 floors the top being a dormer but the reality is 3 living floors, a whole floor higher than my house with views directly down into all my windows. My privacy would be completely gone! All the neighbours along Okeley Lane are equally angry and there was even some talk of a crowd funded judicial review. Move the development further back, scale the bordering building to a maximum of two stories. The original plan was for only 180 properties and now the developers have gone overboard greedy, please stop this!

(21/05/18)

13 Okeley Lane - I have several concerns about this development:

1. No access is proposed at the back. Okeley Lane is terraced properties. We currently rely on

the field for access for tree surgeons & other trades to do work where it is not poss. to carry machinery/materials through the house

2. Light and noise pollution
3. Loss of privacy-we are not currently overlooked
4. Increased traffic on Icknield Way-it's already difficult to turn on to Icknield Way, esp. in the mornings & more entry points from new dev. & businesses will make it worse
5. Width of Miswell Lane where it joins Icknield Way is already insufficient, increased volume of traffic will make it worse
6. Tring's infrastructure can't cope-docs & schools already at capacity/oversubscribed and Tring High Street is often gridlocked as it is, without the extra 200+ cars

(21/05/18)

2 Little Hoo, Tring - I write on behalf of Tring in Transition to raise objections to the above planning application. The grounds for objection are that the application is non-compliant with some relevant DBC policies, and only partially compliant with some others.

Additionally we are concerned with the impact of the development boundary adjoining properties on Okeley Lane on the mental wellbeing of residents on the grounds that assurances previously given to them regarding increasing distance of properties on the new development from Okeley Lane properties, and its density, adjoining their gardens appear not to be delivered by the plan as submitted.

### **Water Usage**

Achieving per capita water usage to comply with Building Regulations is challenging. The applicant's Sustainability Statement document section 2.5 claiming proposed compliance with Building Regulations on per capita water usage is flawed in a number of respects and significantly understates likely actual water usage.

It understates the actual time taken in a shower. UK surveys show this to be 5 – 10 minutes (average 7.5 minutes), rather than the 4.37 minutes assumed in table 3. Using the correct average usage time means 60 litres water per person per day from shower use, almost twice the claimed usage of 34.96

Toilet water usage is given at 13.5 litres/per/person per day. The figure often quoted is 34 with modern toilet flush systems.

This means that the per capita water usage at this development may be nearer 155 litres rather than the 110 projected.

***The applicants should therefore be required to instal greywater recycle system and water butts. Cost impact will be very marginal.***

### **Transport**

The application does not comply with DBC Adopted Core Strategy, policy NP1 "The Council will work proactively with applicants to find solutions ... that help to improve ... environmental conditions in Dacorum", nor policy CS28 which states "Carbon emission reductions will be sought in ... the use of transport as far as possible"

Specifically the application does not provide for future proofing of this development to take account of for the Govt policy to phase out fossil fuelled cars by 2040. See also National Planning Policy Framework para 35. ***The applicant should therefore be required, as a condition of planning, to install electric charge points at the front of 20% of new houses with passive provision (cabling and power supply to enable easy conversion to use later by adding a socket) at the remainder, at new employment units, and at cemetery car park.***

Paragraph 9.2 of DBC Adopted Core Strategy is also relevant “Measures to reduce pollution and promote cleaner fuels (eg electric cars) should be encouraged.”

### **Energy**

The application is only partially compliant on this issue. Commitment to build for solar gain, and at energy efficiency better than the (very low) Building Regulations requirements is welcome and follows level 1 of the energy hierarchy, level 3 of that hierarchy has been ignored. However, an overarching requirement of fig 8 of DBC Adopted Core Strategy under “Creating a cleaner healthier environment” is to “optimise the use of renewable resources”

***The applicant should therefore be required, as condition of planning, to install solar thermal and solar PV on rear roofs of all houses and industrial units facing south/south west. The cost is extremely marginal as typical solar PV on a house costs around £1,500 with the main cost (scaffolding) already being in place on this development for building upper storey and roof installation.***

Visual impact from the AONB will be reduced/removed by the additional tree screening proposed along the west side of the development (Aylesbury Road elevation)

### **Trees**

No clear commitment has been given to delivering on DBC’s requirement in policy 29(h) to incorporate at least one new tree per dwelling, despite description of tree types to be used. This needs to be rectified.

### **Drainage**

Response j on the Sustainability Checklist is inadequate. It states “Where feasible the private areas of hardstanding on the site will be permeably paved in order to facilitate the infiltration of surface water from the roofs and the areas of hardstanding themselves directly into the underlying ground.”

***The applicant should be required to insert and implement “technically” after “Where”.***

### **Policy CS8**

In addition to the proposed path/cycle route through the site the applicant should be required to provide shared footpath and cycle route from all points of site egress onto Icknield Way and Aylesbury Road, to link with existing footpaths along those two roads leading towards Tring centre.

### **Sustainability Checklist**

No response has been made to question p. ***The applicant should be required to respond to this item whilst complying with relevant DBC policies.***

(21/05/18)

60 Dundale Road - Deeply concerned about the insufficient discussion of supporting infrastructure, particularly schools and doctors surgeries.

(21/05/18)

23 Okeley Lane - We wish to object to the planning application Ref 4/00958/18/MFA at LA5, Land at Icknield Way, Tring, Herts.

We would firstly like to express our concern that being a neighbour of the site we received no information regarding this application from Dacorum planning. This is despite registering previously for any future information regarding development of LA5.

We wish to make you aware of a number of strong objections we have with regards to the

proposed development of 240 dwellings on this greenfield site. As an immediate neighbour to the site of the proposed development we are of the view that the development will have a serious impact on our standard of living. Our specific objections are as follows:-

#### 1. Detrimental impact on residential amenities.

Master Plan for Local allocation LA 5 policy 6.22 The term 'focal buildings' relates more to the design of buildings rather than their height. Focal buildings should be located:

- in key frontages;
- at the entrances to the settlement;
- to mark prominent vistas; and
- overlooking the green corridor in the centre of the development and the diverted public footpath in the northern area.

Master Plan for Local allocation LA 5 policy 6.29 The new housing backing onto the existing houses in Okeley Lane should have longer than normal back gardens, in order to respect the privacy of these properties.

Master Plan for Local allocation LA 5 policy 6.41 Existing views into and out of the site should be retained as far as possible and opportunities taken to enhance these views (see photos 9 and 10 below). The landscape strategy, to be produced at the planning application stage, should give further consideration to enhancing existing views.

We believe the proposed development does not respect the local context, in particular the scale and proportions of surrounding buildings. The proposed 2 and 2 1/2 storey high 'focal buildings' to the eastern boundary with Okeley Lane properties will have an adverse effect on the residential amenity of neighbours by reason of overlooking, loss of privacy (see point 2) loss of light and the right to enjoy a quiet and safe residential environment. We feel the properties which back onto existing residential areas should be limited to two storey buildings and the design of the houses be accommodated to make them focal properties, rather than by height as detailed in the Master Plan. The 'Madeley' Design 2 1/2 storey buildings to the rear of Okeley Lane also have 2nd storey balconies which will directly face onto Okeley Lane properties. The use of these balconies at a raised height will further result in a severe loss of privacy through overlooking.

The orientation of our property is west facing which adds to the impact of the development, including loss of light. The gardens of Okeley Lane are approximately 16m in length. The master plan states the houses backing onto Okeley Lane should have longer than normal back gardens. In the planning application it states the properties backing onto Okeley Lane would have 'generous' gardens. This statement is vague without context.

In seeking clarification from the developer CALA homes they stated the minimum distance required between the window of one property to the window of another property is 21m. Therefore the proposed houses could be built 5m from our boundary. This would result in a severe loss of residential amenity of neighbours through loss of light, privacy and overlooking. The visual plans show gardens of longer length but as no clear measurements are given, we are very concerned with regard to how far these houses will be from our property for the reasons stated. To respect local context and the master plans recommendations these gardens should be significantly more than 5m away from our boundary, to ensure the houses are less overbearing and intrusive.

Views into the site from Okeley Lane are further reduced due to the 2 and 2 1/2 storey houses.

#### 2) Loss of privacy and overlooking.

The proposed site of development rises in height from the eastern boundary. This means that the primary amenity of our garden, would be severely overlooked from the top rooms of the new development, especially the 2 and 2 1/2 storey properties with rear facing balconies at the second storey level. This would result in a serious invasion of our privacy. The proposed properties have direct facing large full height windows to the rear at 2nd storey level (with the balconies) and direct facing normal sized windows in the 2 storey properties. The 2 1/2 storey houses have direct facing dormer windows at the 2 1/2 storey level.

The design of the proposed properties does not afford adequate privacy for the occupants of Okeley Lane, with particular regard to their right to the quiet enjoyment of garden amenities. We would urge you to consider the responsibilities of the council under the Human Right Act in particular Protocol 1, Article 1 that states that a person has the right to peaceful enjoyment of their possessions which includes the home and other land. We believe that the proposed development would have a dominating impact on us and our right to the quiet enjoyment of our property. Article 8 of the Human Rights Act states that a person has the substantive right to respect for their private and family life. In the case of Britton vs SOS the courts reappraised the purpose of the law and concluded that the protection of the countryside falls within the interests of Article 8. Private and family life therefore encompasses not only the home but also the surroundings.

It is our view that the balconies, window size and window positions should be reconsidered to maintain privacy for residents of Okeley Lane.

### 3) Boundary

Master Plan for Local allocation LA 5 policy 6.42 All the existing trees on the site should be retained. Also, existing hedgerows should be retained and enhanced, particularly along the green corridor which will run through the middle of the development area.

The developer proposes to erect a 1.8m Close Board fence between the properties of Okeley Lane and the new development. We are concerned that the placing of this fence on the boundary, on the plans, is unclear and may damage existing hedgerows which should be retained.

We attempted to gain clarification from the developer CALA homes but they replied that they would need to speak with the owners of each property in Okeley Lane bordering the development to plan erection of this boundary. The current boundary is a mixture of fencing, hedgerows and trees. We feel the hedge boundary should be retained and enhanced as stated in the Master Plan.

### 4) Traffic in Tring

Master plan for Local allocation LA5 policy 5.9 The development must be brought forward based on a full recognition of the varying facets of sustainable development and minimising carbon emissions. As set out in the NPPF and in the Core Strategy, there are numerous components to sustainable development. In relation to master planning, particular attention should be paid to:

- Minimising the need to travel.
- Minimising pollution in all forms, including emissions and ground and surface water pollution and providing natural solutions to achieve this;
- Minimising energy use through design including considering the orientation of properties at a detailed stage in order to maximise passive solar gain;
- Protecting and enhancing biodiversity in layout and design;

-Using land use planning and design to improve health and well-being, for example, encouraging exercise by easy access to open space, to encourage healthy eating, and ensuring well-designed neighbourhoods that reduce crime and the fear of crime; and  
-Integration of new communities with existing ones, maximising connectivity to shops and Tring Railway Station.

Master plan for Local allocation LA5 policy 6.69 A Transport Assessment will be required at the planning application stage. The applicant should enter into pre-application discussions with Hertfordshire County to agree the scope of the report. The assessment may point to the need for off-site highway improvements.

As residents of Tring we are concerned about the increase in traffic from the site and its impact on local roads due to noise, pollution and safety. The design of the site means that traffic from the north side with access to Icknield Way will be required to use existing roads to access the town namely, Miswell Lane(which is very narrow), Christchurch Road(which has two schools) and Dundale Road(which is narrow near town centre and has a school entrance at Frogmore Street). We feel these roads are at risk of becoming 'rat-runs' due to the desire of new residents to access the town. We feel therefore that there should be access through the site to enable northern residents to access the southern exit to the site and Tring, without adding traffic to existing residential roads. Alternatively the northern exit could be made a left hand turn only exit so residents had to access Tring via main routes and not residential roads. We feel, although the development is planned to be sustainable, people by nature will use cars to access the town.

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#### 6) Density of Development

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

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#### 7) Parking

The proposed development has an allocation of 617 parking spaces which averages as 2.57 spaces per property. In some areas of the development the allocation of parking per property is unclear. Plots 55,56,57 appear to have to share 6 spaces yet these are placed in a block of 2 by 3 which seems ambiguous that they will be shared equally and be easily useable. In addition the flats on the new development appear to only have one allocated space. Our concern is that parking in the future may spill onto the surrounding residential roads and the cemetery parking, especially as the majority of the homes are 4 bedrooms and families may have additional cars. The flats are also likely to have two occupiers. This has occurred in Tring with previous developments, such as flats located along Brook Street, where the overspill of cars is along the main road reducing space for the main carriageway.

In conclusion, we would also like to request that, should the application be approved, the council consider using it's powers to enforce controlled hours of operation and other restrictions that might make the duration of the works (currently 5 years) more bearable. We would urge the council to ensure no construction staff access the site from the eastern boundary residential area to avoid inconveniencing neighbours.

We would be grateful if the council would take our objections into consideration when deciding on the application. We would welcome the opportunity to meet a representative of the planning department at our home to illustrate our objections at first hand.

(21/05/18)

Resident of Okeley Lane - On 17/05/18, I attended a meeting to discuss the Cala Homes proposal for the building of 240 new homes on the LA5 site in Tring. Many issues were raised at the meeting; unfortunately there were no representatives from Dacorum Borough Council in attendance to hear our concerns. Subsequently, I would like to raise objections to the proposal. Myself and my family will be directly affected by the building work and homes on the LA5 site as we live in Okeley Lane and therefore the rear aspect of our home backs directly onto the site. We will also be more generally affected as residents of Tring by the impact on infrastructure.

I should point out that I am not opposed to the building of new homes in the area; I understand that homes are needed, particularly affordable homes for local people. However, having seen the proposed plans I have several concerns:

1. Firstly, the distance of the houses from existing homes on the boundary of the site on Okeley Lane, which the Cala Homes representative states will be close to 21 metres back-to-back – that is, from the back of the existing homes to the back of the new houses. I feel that the proximity of the buildings will greatly impact on residents' privacy as the windows of the homes are directly facing our windows and rear gardens. Some of these planned buildings are 2.5 storey which means they will have windows in the roof space too, so , even with a proposed 1.8m boundary fence, a full view of our homes/gardens will be afforded to anyone looking out. Cala Homes state that the most dense concentration of new homes will be along this boundary, meaning that our home could potentially be overlooked by several homes. The neighbouring buildings proximity would also increase the potential noise from these homes. Thus, the proposal would greatly harm the amenities we enjoy such as privacy and the right to enjoy a quiet residential environment. Amenity space and the privacy of adjoining properties should be respected according to the Dacorum Core Policy CS12: Quality of Site Design. Furthermore, the Adopted Master Plan for Local Allocation LA5 states that privacy of neighbouring private gardens should be respected.
2. The proximity of the proposed development will mean that all residents whose homes back onto the boundary will have a view of densely-concentrated buildings with very

sparse natural elements visible. Therefore the visual impact of the development is significant for the boundary residents of Okeley Lane. Planning should avoid visual intrusion, according to the Dacorum Core Policy CS12: Quality of Site Design. The Adopted Master Plan (4.19) also acknowledges the Landscape and Visual Impact Assessment recommendation that a buffer of open space should be sited between existing properties and those closest to the boundary.

1. The existing homes aspect is west-facing so the new houses will cause overshadowing, blocking out sunlight and warmth particularly in the afternoons and evenings, greatly affecting our enjoyment and use of our rear garden space. As the land on our property slopes upwards from house to end of garden, the proposed buildings will tower over our home substantially which will block out even more light. Again, the dense concentration of building along the boundary means that the overshadowing will be substantial. Loss of sunlight and daylight should be avoided, according to Dacorum Core Policy CS12: Quality of Site Design.
2. The proposed homes, if positioned at around 21 metres back-to-back from existing homes, would have grounds that are not proportionate to the existing gardens. The properties along Okeley Lane are characterised by rear gardens of around 16 metres in length and front gardens/grounds of almost 10 metres in length. The plan indicates that the proposed homes backing onto the Okeley Lane boundary would have no grounds to the front aspect and would have rear gardens of around 5 metres in length, less than a third of the Okeley Lane gardens. The plan does not respect local context, in particular the scale and proportion of grounds at front and rear to homes.
  - The planned access for motor vehicles entering and exiting the site will naturally increase traffic flow into Miswell Lane and Christchurch Road, being the most direct routes into the town from Icknield Way, turning these roads into 'rat runs'. This is particularly worrying as both roads are frequently traversed by young children walking to local schools (Goldfield and Bishop Wood), therefore highway safety is at risk.
  - Finally, there is the matter of infrastructure to consider. Cala Homes have increased the number of homes from the original plan of 150 to 240; as many of these are larger family homes, this will substantially increase the population of Tring. As many residents of Tring at the meeting pointed out, there are not enough primary school spaces for the children who currently live in Tring with some classes already exceeding 30 pupils. There seems to be no forward-planning to acknowledge the impact that the increased population will have on the infrastructure of the town. Tring roads are already in a poor state with potholes and uneven surfaces, and the public transport services are not adequate at present to cope with added volume of traffic/passengers. The car park at Tring station for example is already full to capacity most days. Plans to include cycle paths in the development are commendable but pointless considering the lack of maintained cycle paths through the rest of the town.

(20/05/18)

48 Beaconsfield Road - I do not think we need so many houses in this part of Tring, there is no infrastructure to deal with all the extra cars and people that it will generate. I am not happy that the cemetery extension is being placed away from the current cemetery this makes no sense to me when there is a field behind the cemetery which could accommodate the extension there. Houses are going to be built too close to the end of our road, taking away our green space. I am concerned that Beaconsfield Road will be used as a short cut by many people from the new housing, especially if a cycle way is accessible from Donkey Lane. I am sure it will cause our houses to drop in value, we will have to put up with 3 years of disruption if the site goes ahead. It is not clear where the affordable housing will be and what this actually means. It is a backward step for Tring and I am very disappointed that the views of the people of Tring have been ignored and so many houses are planned.

(19/05/18)

86 Beaconsfield Road - We are writing to object to the current planning application for the above development on the grounds of increased noise and disturbance resulting from use, and in addition overlooking/loss of privacy.

We object to 1) the density of the housing proposed at the Eastern end of the development, in particular in the area immediately to the North of the existing cemetery, and 2) to the high proportion of affordable dwellings (social housing) in the same area.

The effect on the level of noise we are accustomed to experiencing at our property, which we have owned and lived in for over 16 years, will be seriously increased due to the proximity of this proposed densely populated area immediately opposite our home.

We have fully accepted for a number of years now that property was to be built opposite our house, but not in this density. We do not believe that on a development of this size it is necessary to site a two-and-a-half storey apartment block directly opposite existing homes in Beaconsfield Road and towering over the cemetery wall. I refer you to the site constraints listed on page 32 of the above planning application where it is stated 'the privacy of neighbouring private gardens should be respected in Beaconsfield Road and Okeley Lane' and that 'the council is seeking a buffer around the outskirts of Tring Cemetery to protect its setting'.

We do not understand the desire for a 'soft edge transition' on the Western side only; that the 'development should not have a serious adverse impact on views from the surrounding countryside.....'; and the desire (page 49) for 'lower density housing arranged to face the various open spaces' when the effect of the proposals deliberately disadvantages existing home owners facing the site. Is this truly what Dacorum Borough Council intends?

We object to the current planning application on the basis of all of the above and would advocate a return to something akin to the initial site layout as shown on page 39 of the application.

(19/05/18)

54 Beaconsfield Road - Further to the Tring Council Extraordinary Meeting on 17 May.

At that meeting, a Cala Homes representative claimed that CIL payments could be used to deal with infrastructure issues, and that they could be found in Regulation 123. I have checked that regulation on the DBC website, and it contains no specific proposals for LA5 and only the usual platitudes about the need to assess infrastructure issues arising out of such developments.

I therefore continue to object to the application, on the grounds that infrastructure issues have not been adequately addressed.

(19/05/18)

5 Buckingham Road - I went to the Tring Town council meeting held in Tring on 17 May and I am writing in support of housing development on LA5 by Cala. My only reservation is that this is a low density application and in view of the requirement for Tring to have 480 additional houses in the current Core Strategy and that there are proposals for a possible 1,000 additional houses in the forthcoming plan, I consider the density of housing on LA5 should be increased. My reasoning for allowing increased number of houses on this site is that to comply with government requirements, Dacorum Borough Council now has a greater housing need to meet within the District and must therefore acknowledge there will have to be more building on green fields to meet that need, including those in Green Belt. It is surely therefore better in planning terms and for the conservation of the Green Belt to make best use of existing

allocated sites including LA5, thereby reducing the need to provide so much housing on new sites. I can see no reason there should be such a low density restriction on the numbers of houses to be built on LA5, provided that in all other respects the scheme is planning policy compliant which I assume it is and with the increase in the objectively assessed housing need for the district being a material planning consideration.

This would help to reduce the requirement to build on other green sites in Tring and also increase the number of social affordable houses in accordance with the agreed 40% affordable housing which some members of the public thought a good idea. As you are aware LA5 has very good transport link from Icknield Way to Tring Bypass and Aylesbury.

At the meeting on 17 May held at the Victoria Hall people complained often without basis, not listening to replies just very NIMBY; the objections raised were:

Schools had no available places This objection was answered by Councillors who confirmed that temporary accommodation was being arranged at Tring and provision would be made for spaces in the schools as required. Nevertheless people continued to object saying that was not true and there was no room to expand (although all schools in Tring can accommodate small extensions).

Roads and transport Objections were made on increased cars driving in Tring, parking, lack of cycle lanes (allocated in the Cala planning application), the need for buses (Councillor Hollingsworth said that buses are currently provided but so few people use them the buses have to have a very significant subsidy and I believe he mentioned £2,000p.w.). Cala also referred to bespoke contributions to transport.

Loss of view/site of and new houses People living in Oakley Lane did not want houses built at the bottom of their gardens. They have enjoyed uninterrupted views for over 40 years and don't want to look at houses at the bottom of the garden (like most of us). They felt plans should be redrawn so the new houses did not impact on their current situation.

Social Affordable housins Allocated 40% in accordance with guidelines. Some people could not grasp what 40% meant. Others wanted more scattering over the site, some wanted more social houses, some wanted less. All seemed to like to complain.

NHS hospitals and doctors Concern was raised about more people using the health facilities. It was explained to them that this was NHS jurisdiction and account of this had been taken.

£3million from Cala to Dacorum People doubted that money paid to Dacorum would be used for Tring. Cala said they had no influence on that. Councillors could not give cast iron assurances to satisfy peoples objections. They complained because no Dacorum representative was there to answer queries.

Cemetary extension Complaints were raised about the cemetary extension being located apart from the current cemetary site. The reason for this being that the Cemetary Manager considered the extension site per the plan to be a better site and in accordance with Dacorum's agreement.

I was astonished when at the end of the meeting, the Councillors held a vote and voted to reject the Cala planning application. I can only think they did not want to upset their voting public. I have lived in Tring 75 years and cannot understand how they do not realise Tring is part of the wider community, and must accept, and indeed to grow must have more housing and new people leading to greater facilities.

Again I re-iterate that my view is that the housing density on LA5 should be increased in line with Governments requirements and demand for more housing. In addition to helping to restrict growth on Green and Green Belt land an added bonus for Dacorum and HCC would be that more rates would be payable to them.

(18/05/18)

26 Longfield Road - 1) The number of units (at 240) is a lot higher than in the local plan. This will strain local services and infrastructure and will be a particular issue for Beaconsfield Road where LA5 residents living in the flats may use as overflow parking. 180-200 units was in the local plan.

2) We need detailed commitments on exactly what recreation and play equipment would be provided. The recent West Tring park survey showed that there is a huge lack of facilities in West Tring for older children and teenagers. The application only details a wooden play area for young children and a possible BMX track. This needs to be specified and there is a missed opportunity for specifying football pitches etc for informal use or a MUGA. Miswell Park only has a small one of these and that is some distance from LA5. Without proper play facilities we will just end up with a high density development with very little for older children and teenagers.

(18/05/18)

Jessamine House, King Street - Yesterday evening I attended the special meeting organised by Tring Town Council to discuss the proposed LA5 development by Carla Homes in West Tring (planning application 4/00958/18/MFA). It was very disappointing that a representative from Dacorum Council did not attend to answer questions.

It seems that the proposed cemetery extension was separated from the existing cemetery to buffer the development from the proposed gypsy and traveller site. Now that the gypsy and traveller site plans have been scrapped, would it not be better to simply extend the existing cemetery site, either along Aylesbury Road or up towards Icknield Way.

The plan has made provision for a cycleway and footpath within the site to the A41 roundabout, but most journeys surely will be into Tring for shopping, school etc. Should a cycleway and footpath not be provided into the town, this would have the added benefit of minimising the traffic impact of the development on the existing road infrastructure.

In view of Dacorum's apparent indifference about Tring displayed by their absence last night, I wonder if Dacorum is best placed to make decisions as to future plans for Tring.

(18/05/18)

74 Beaconsfield Road - I do not object to new housing in Tring. I am concerned with the below FACTORS of the application on the following grounds :-

1. Minimising impact to residents is not taken seriously. If it were then the cemetery extension would run a natural course up the right hand side of the plot and extend lengthways thereby keeping a piece of green for existing residents of Longfield, Beaconsfield and Highfield road.

2. There is no guarantee of timely provision of infrastructure by Dacorum council to support this no. of houses. The doctors, station car park and schools are all oversubscribed, evident in the fact that I could not secure a place for my child for Goldfield school at the end of the road (600m!) I am concerned about my children's placement in high school.

Why has 180 become 240 houses? This decreases quality and increases infrastructure need?

What's the next step to collaborating with the local residents, 'amendments' were mentioned by Cala at the meeting tonight - When

(17/05/18)

88 Beaconsfield Road - I object to this planning application because I don't think Tring has the infrastructure to support the volume of people who will live in the 240 homes. This will significantly increase the traffic on the two busy access roads by between 500 to 1000 cars. It will also cause pressure on local doctors surgeries which are already very busy and make it more difficult to make an appointment with the doctor. It is also already difficult to park in the town and these homes will put additional pressure on the town and its car parks. I live opposite the site and will be significantly affected by prolonged building works. Whilst there is not an access onto Beaconsfield Road the site plans show an open area here. I would request if this is to be approved that Cala Homes are required to fill this space with hedging to reduce light and noise pollution from this substantial development. This will also ensure a level of privacy for residents in Beaconsfield home and in the new development.

(17/05/18)

53 Longfield Road - There has been insufficient consideration undertaken by Dacorum on the additional pressure on schools, roads, doctors following the completion of this development. For example, assuming 2 children per household will add an additional 500 children who will need local primary schools....where will then go? Dacorum have not fully assessed the increased pressure on local infrastructure and services that will result from the 32 houses on Francis House. If the proposed 2036 Dacorum Local Plan results in 1000 houses opposite Pendley then it will become a logistical nightmare to live in Tring. 240 additional dwellings in a town like Tring is too much.

(17/05/18)

38 Beaconsfield Road - 1) The 240 houses are too many for the site. The original plan had been for 180 houses? Tring is losing green belt. This will be far too dense a development with far too little consideration for green space.  
2) There are far too few parking spaces which will have implications for surrounding roads which already are too heavily used.  
3) I am unsure why the cemetery extension does not run on from the cemetery and has been divided?  
4) Insufficient leisure facilities. There also needs to be consideration for all ages with facilities for older children (such as a BMX track or skate park) and fitness route  
5) There is no evidence of proper planning for the already oversubscribed GP surgery and local schools. For the second time in a few years a boy on our road has been unable to secure a reception place.

(16/05/18)

104 Miswell Lane - I support new housing in Tring and understand that the principle of development on this site is already established through the Local Plan; however, I am interested to see the applicant's socio-economic assessment in relation to how the additional housing will be serviced in relation to GPs, schools etc. As there is no separate document, I assume that this is dealt with in the applicant's Planning Statement, but unfortunately this doesn't appear to be in the documents available on-line.  
I appreciate that the proposal is that any additional facilities will be funded through the CIL payment; however the applicant should in my view provide an assessment to demonstrate that the impact on existing services, including schools, will be acceptable and that the CIL payment is capable of meeting this demand, rather than requiring direct provision on site.

I would be grateful if you could ensure that the Planning Statement is available as soon as possible.

(12/05/18)

54 Beaconsfield Road - The Adopted Master Plan for LA5 was to build 180-200 new homes.

This Hybrid Planning Application - apparently simply accepting the figure used in the Cala Homes public presentation - now talks of building 240 dwellings on the site.

Tring's infrastructure - schools, GP surgeries and roads/streets - is already strained, so even building only 180 new homes would only overload the infrastructure further.

Since neither the Master Plan nor the Cala Homes plan seem to contain any proposals to strengthen the infrastructure, the effect of building any more than 180 homes will be to stretch the already overloaded schools and GP surgeries beyond their capacity to cope. And the current congestion of the town's traffic will both extend further and last for longer.

I therefore object to this application being approved.

(11/05/18)

31A Beaconsfield Road - I wish to object to the above planning application.

Firstly, I think Dacorum council have done very little to publicise the application. I live on Beaconsfield Road and there is one planning notice on a lamppost right at the end of the road adjacent to the fields and speaking to residents who live closer to the development than me, there hasn't been any postal notifications. I'm not sure what the rules are regarding this but it is my opinion that for such a big development should be more widely publicised. I would be grateful for your feedback regarding this.

I understand that the land has been designated by the council for house building and therefore some development is inevitable but I wish to object to the application that has been put in, for the following reasons

- 1) It is for 240 homes, the local plan stated 180-200 as far as my memory goes
- 2) There is not enough parking allocated. In particular around the apartment buildings. The plans are long and complicated but from my analysis I can see just 9 spaces around the apartment building closest to Beaconsfield Road which seems to be approx. 15 flats. Not enough, there will be overspill onto surrounding existing roads which are already busy. The plans suggest approx. 550 parking spaces in total for 240 dwellings however this includes garages and realistically not many people put cars in garages these days. Therefore the parking is insufficient for residents and visitors. The roads within the development are narrow and with excess cars potentially narrowing the road further, this will create difficulties for emergency service access.  
Many of the houses are 3 storey so will have no loft storage therefore people even less likely to put cars in garages and off the road.
- 3) The housing density is too high with too few green areas amongst the houses and roads. Gardens are generally very small.
- 4) I feel that access to the site via Icknield Way will create a dangerous road junction on an already busy road, particularly at rush hour.
- 5) The doctors surgeries are already at capacity as are the school and other services.
- 6) Cala homes have options on the land beyond this development (the triangle shape towards the A41 roundabout) so it is likely they will try to develop this further in future which will totally change the outlook of Tring
- 7) I attended the meeting in Wigginton just before Christmas (a very inconvenient location and date) and heard a lot of discussion and feedback regarding the above points. Cala state in their application that they have taken feedback from that meeting into consideration but they do not address many of the points above and to me the plans look exactly the same.

(11/05/18)

11 Highfield Road - This development makes it even more urgent for the Icknield Way end of Miswell Lane to be widened. Perhaps this could come from the developer's Community Infrastructure Levy (CIL). That end of the Lane is too narrow for a bus & another vehicle to pass. Increased housing is likely to increase traffic in Miswell Lane. There is no pavement on one side, which has a hedgerow that is well maintained but a rogue partly severed tree limb broke my wing mirror Jan 2018.

Rothschild Doctor's surgery is struggling with the current workload and the carpark is minute. More housing nearby will increase the burden.

Hence, I support this provision of more housing for Tring, provided that there is some contribution to the local infrastructure of the narrow Miswell Lane and the overburdened doctor's surgery.

(02/05/18)