

ITEM NUMBER: 5a

19/02735/MFA	Construction of 10 new dwellings with associated access road, parking and landscaping	
Site Address:	Land East Of Hardwick Barnes Lane Kings Langley Hertfordshire	
Applicant/Agent:	Mr Weir	
Case Officer:	Colin Lecart	
Parish/Ward:	Kings Langley Parish Council	Kings Langley
Referral to Committee:	Council Scheme on Council owned land	

1. RECOMMENDATION

1.1 Delegate with a view to approval subject to the completion of a Section 106 Agreement (100% affordable housing – social rent) and satisfactory comments/ recommended conditions being received from the Lead Local Flood Authority.

2. SUMMARY

2.1 Overall, the development is acceptable in principle. The site is allocated for housing and would optimise the use of currently under-utilised land while also contributing to affordable housing provision within the local area. The design and layout of the proposal respects the character of the surrounding area while providing a certain level of innovation in built form, thus creating visual interest. No harm relating to the street scene or residential amenity can be identified. While the loss of the four poplar trees to the front of the site is unfortunate, these would be replaced with a species more suited to be located within close proximity to residential development.

3. SITE DESCRIPTION

3.1 The application site comprises mostly open grassland with an electrical substation that is fenced off and accessed via Barnes Lane as well as a fenced area on the north western part of the site that is used as a horse paddock. The site gently slopes down from south to north away from Coniston Road. Coniston Road which consists of two storey terraced properties lies to the east and Barnes Lane, consisting of two storey detached properties, lies to the west. The site is bounded by the Green Belt to the North.

4. PROPOSAL

4.1 The application seeks permission for the construction of 10 new dwellings with associated access road, parking and landscaping. The proposal would include 7 no. 2 bed properties and 3 no. 3 bed properties and 19 car parking spaces in total.

5. PLANNING HISTORY

No relevant planning history

6. CONSTRAINTS

Parking Accessibility Zone (DBLP): 4
Special Control for Advertisements: Advert Spec Contr
CIL Zone: CIL2

Former Land Use (Risk Zone): Barnes Lane Landfill, Kings Langley
Green Belt: Policy: CS5
LHR Wind Turbine
Large Village: Kings Langley
Parish: Kings Langley CP
RAF Halton and Chenies Zone: Green (15.2m)
Residential Area (Town/Village): Residential Area in Town Village (King Langley)
EA Source Protection Zone: 3
EA Source Protection Zone: 2

7. REPRESENTATIONS

Consultation responses

7.1 These are reproduced in full at Appendix A.

Neighbour notification/site notice responses

7.2 These are reproduced in full at Appendix B.

8. PLANNING POLICIES

Main Documents:

National Planning Policy Framework (February 2019)
Dacorum Borough Core Strategy 2006-2031 (adopted September 2013)
Dacorum Borough Local Plan 1999-2011 (adopted April 2004)

Relevant Policies:

National Planning Policy Framework

- Section 2 - Achieving sustainable development
- Section 5 - Delivering a sufficient supply of homes
- Section 8 - Promoting healthy and safe communities
- Section 11 - Making effective use of land
- Section 12 - Achieving well-designed places

Local Planning Policies

Dacorum Borough Core Strategy

- NP1 - Supporting Development
- CS1 - Distribution of Development
- CS4 - The Towns and Large Villages
- CS8 - Sustainable Transport
- CS9 - Management of Roads
- CS10 - Quality of Settlement Design
- CS11 - Quality of Neighbourhood Design
- CS12 - Quality of Site Design
- CS13 - Quality of Public Realm
- CS17 - New Housing
- CS18 - Mix of Housing

- CS29 - Sustainable Design and Construction
- CS35 - Infrastructure and Developer Contributions

Dacorum Borough Local Plan (Saved Policies)

- Policy 10 - Optimising the use of Urban Land
- Policy 18 - Size of New Dwellings
- Policy 21 - Density of Residential Development
- Policy 51 - Development and Transport Impacts
- Policy 57 - Provision and Management of Parking
- Policy 58 - Private Parking Provision
- Policy 99 - Preservation of Trees, Hedgerows and Woodlands
- Appendix 1 - Sustainability Checklist
- Appendix 3 - Layout and Design of Residential Areas
- Appendix 5 - Parking Provision Appendices

Supplementary Planning Guidance/Documents

- Accessibility Zones for the Application of Car Parking Standards (2002)
- Manual for Streets (2010)
- Planning Obligations (2011)
- Roads in Hertfordshire, Highway Design Guide 3rd Edition (2011)
- Site Layout and Planning for Daylight and Sunlight: A Guide to Good Practice (2011)

9. CONSIDERATIONS

Main Issues

9.1 The main issues to consider are:

The policy and principle justification for the proposal;
 The design, layout and impact on the surrounding area
 The impact on residential amenity
 Trees and Landscaping
 The impact on highway safety and car parking.
 Affordable housing provision
 Ecology
 Drainage
 Contaminated Land
 Community Infrastructure Levy

Policy and Principle of Development

9.2 With respect to the delivery of housing, the council can no longer demonstrate a 5-year land supply. At the heart of the National Planning Policy Framework (2019) lies a presumption in favour of sustainable development where paragraph 11 section d states that for decision making this means:

9.3 Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:

- i) *The application of policies in this Framework that protect areas or assets of particular important provides a clear reason for refusing the development proposed; or*

- ii) *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework as a whole.*

9.4 Paragraph 117 of the Framework states that planning policies and decision should promote an effective use of land in meeting the need for homes and other uses. Paragraph 118 section d states that planning policies and decisions should promote and support the development of under-utilised land and buildings.

9.5 Furthermore, the site is located within an established residential area of Kings Langley where in accordance with Policy CS4 of the Core Strategy (2004) the principle of residential development is acceptable. The site has also been allocated for housing (approximately 12 units) under proposal H/18 of Dacorum's Adopted Site Allocations (2017).

9.6 From the above, it is considered that the residential development of the site is acceptable in principle, both in national and local policy. It should be noted that the site does not lie within the Green Belt, which extends from the northern boundary of the site.

Design, Layout and Impact on Surrounding Area

9.7. Paragraph 124 of the Framework states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. As such, good design is a key aspect of sustainable development. Paragraph 124 states that planning decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.

9.8 Policies CS10, CS11 and CS12 of the Core Strategy (2013) are overarching design principles that generally state developments should respect/enhance the character of the surrounding area.

9.9 In terms of layout, plots 7-10 have been designed to follow the character of the existing terraced rows along Coniston Road, while plots 1-6 would face onto the road. Fenestrations and brick detailing would be introduced onto the flank elevation of plot 10 which would face onto the street; this is considered an improvement upon the blank gable ends of the existing properties that currently face onto the street. Whilst plots 1-6 would differ in orientation to the existing properties along the road, they would be set back approximately 20m from the street scene, with further landscaping in between this to soften their appearance. Plots 1 and 2 have been rotated slightly to meet the minimum distances set by UKPN from the substation and overhead cables.

9.10 The new dwellings would measure approximately 8m in height. The existing terraced rows on Coniston Road measure approximately 7.3m in height. The increase of approximately 700mm in height is not considered to be harmful. As mentioned, plots 7-10 would be significantly set back from the street scene to mitigate against this and plot 10's flank elevation would feature fenestrations and detailing to break up the expanse of brick wall facing the street. It is not considered the change in land levels is significant enough to alter the perception of the development to an extent that would result in harm to the character of the area. The original proposed levels of the site have been lowered to further mitigate against concerns regarding height, but also due to any future remediation works linked to land contamination that would need to be conducted should permission be granted. Furthermore, the development would sit at the end of the street between the terraced rows of Coniston Road and the taller dwellings located along Barnes Lane. The proposed form of the dwellings would thus represent a transition between the two streets.

9.11 Every unit within the site would exhibit slight variations in form which would create visual interest and a sense of place within the development. This combined with the differing materials used for the road surfaces within the site is considered to create a high quality design that would respect the surrounding area while also providing a level of innovation to the existing street scene.

It should be noted that Paragraph 127, section c states development should be sympathetic to local character while not preventing or discouraging appropriate innovation or change and it is considered the proposal meets this criteria.

9.12 Due to the above, it is considered the development would not result in harm to the surrounding area. The development would respect the street scene while providing a level of innovation and visual interest to the existing built form of the street. Whilst the layout does differ, the units facing onto Coniston Road would be significantly set back. It is considered that the increase in height of the units over the existing terraced properties is modest and does not constitute harm, especially when taking into account the location of the proposal between the properties on Barnes Lane and the terraced properties on Coniston Road.

Impact on Residential Amenity

9.13 Policy CS12 of the Core Strategy (2013) states that development should avoid visual intrusion, loss of sunlight and daylight, loss of privacy and disturbance to the surrounding properties. Saved Appendix 3 of the Local Plan (2004) also provides guidance relating to design and residential amenity.

9.14 Saved Appendix 3 states that a minimum back to back distance of 23m should be maintained between dwellings. The rear of plot 8 would be approximately 32m away from the rear of 90 Coniston Road. Plot 10 would be located approximately 38m away from 86 Coniston Road. Thus, the minimum distance has been met and it is considered that the excess beyond the 23m guidance would mitigate against the gradual increase in land level from the existing properties to the site. Furthermore, the existing terraced properties fenestrations would be slightly orientated away from the fenestrations of the new properties. It should also be noted that a certain level of overlooking between rear gardens is expected in built up residential areas.

9.15 Due to the above, it is considered the development would not have a detrimental impact on nearby properties in terms of loss of outlook, privacy and light.

9.16 With regards to the properties on Barnes Lane, unit 1 would be positioned approximately 38.5m away from the property known as Merlins and approximately 35m from the property known as Hardwick. Existing landscaping along Barnes Lane would also be retained which would screen the development in addition to these distances.

9.17 The garden depths of each plot would vary and they are included below (approximate):

Plot 1 – 10.9m
Plot 2 – 8.3m
Plot 3 – 9.7m
Plot 4 – 9.8m
Plot 5 – 9.8m
Plot 6 – 9.6m
Plot 7 – 10.4m
Plot 8 – 8.75m
Plot 9 – 9.7m
Plot 10- 9.6m

9.18 The above depths would fall below the 11.5m require contained within Saved Appendix 3. However, it is considered that these amenity spaces would all be functional areas large enough to be used by future residents. Moreover, Appendix 3 states that reduced distances are acceptable if the development backs onto open land or is for the provision of starter homes. Plots 1-6 would all back onto the fields to the north and so no sense of enclosure would occur as a result of the

reduced garden depths. Kings Langley Common is also located to the south with woodland located to the south east.

9.19 UKPN guidance states that if a substation is located outside, dwellings should be located at least 10m away. At its closest point, plot 1 would be located 10.6m away and so meets this guidance. Landscaping would also be planted around the substation to soften views and plot 1 and 2 have been orientated to face away from the station to limit direct views onto it from these properties.

9.20 The application is considered to comply with Policy CS12 of the Core Strategy (2012) and Saved Appendix 3 of the Local Plan (2004) in terms of the potential impacts on residential amenity.

Trees and Landscaping

9.21 Policy CS12 of the Core Strategy states that on each development site, planting trees and shrubs help assimilate development and softly screen settlement edges. As well as this, any trees removed should be replaced with suitable species if their loss is justified. Saved Policy 99 of the Local Plan also states that the position of existing and proposed trees within the development should be carefully considered so that a harmonious relationship is achieved.

9.22 The development would result in the removal of 32 existing trees and the planting of 22 replacements. This is a net loss in terms of tree coverage. However, the removed trees would largely consist of category C and U trees according to the submitted tree survey. Many of these trees, which are at the centre of the site, are of little merit from a visual sense and thus their removal can be justified. The four poplar trees to the front of the site are proposed to be removed as the root protection zones are considered to cause significant issues to the proposed house and road levels. These would be replaced with four semi mature trees "Carpinus Betulus" (Hornbeam). The Trees and Woodlands officer considers these replacements to be of a suitable species, stating that they are more suited to exist in close proximity to residential development than the existing species which tends to shed limbs.

9.23 The proposed replacement of *Carpinus Betulus* (fastigiata) is a species which can grow up to 17-22 metres upon full maturity and features a dense canopy. It is considered that in time, these would be an appropriate replacement for the poplar trees visually.

9.24 An Arboricultural Impact Assessment and Tree Protection Plan have been submitted with the proposal. These outline protection measures for the trees to be retained. A new Tree Protection Plan would be secured by condition to include trees not previously covered by the plan at the advice of the tree officer.

9.25 The submitted landscaping scheme is considered acceptable, providing provisions of landscaping to break up hard surfaced areas, soften the frontage of the site and the substation, and provide wildflower planting along the access to the fields to the north.

9.26 Overall, it is considered soft landscaping would be successfully integrated into the scheme to provide a development that includes a variety of planting to complement the range of materials used in the hard surfaces of the development and the dwellings themselves. The new trees to be planted are located in positions where their long term futures would not be threatened.

Impact on Highway Safety

Access, safety and capacity

9.27 Policies CS8, CS9 and saved Policy 51 seek to ensure developments have no detrimental impacts in terms of highway safety. Paragraph 109 of the Framework states, "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

9.28 Hertfordshire Highway Authority have been consulted on the application and has no objection to the proposal. The submitted transport statement demonstrates visibility splays of 2.4m x 25m from the proposed access and this is considered acceptable. The applicant would need to enter into a section 278 agreement with the Highway Authority with regards to the construction of the new access. A pre-commencement condition relating to further details on alterations/relocation of the existing raised table and a submission of a Stage 1 Road Safety Audit would be attached to any permission.

9.29 The parameters used to generate the TRICS assessment within the Transport Statement are considered acceptable by Highways. The vehicular trip rates calculated for the development are as follows:

*AM Peak (08:00-09:00) – Arrivals: 2
Departures: 4*

*PM Peak (17:00-18:00) – Arrivals: 2
Departures: 2*

9.30 Hertfordshire Highway Authority notes that the above trip generation for the proposed site is unlikely to have a significant impact on the performance of the highway network.

9.31 It is accepted that the road becomes congested during school drop off and pick up times due to Kings Langley Primary and Secondary schools being located close by. The Highway Authority has provided accident information which shows that there have been no reported accidents on this stretch of Coniston Road in the last five years. From a highway perspective, there are no existing accident clusters/hotspots nearby to the site.

9.32 Swept path analysis drawings for refuse vehicles have been provided in Figures 3.2 and 3.3 of the TS. The drawings demonstrate that a large refuse vehicle would be able to enter the site from either direction on Coniston Road, manoeuvre around the site, and leave the site in a forward gear. This would allow refuse vehicles to be within 25m of all dwellings. The drawings demonstrate that vehicles are able to safely manoeuvre around the site to an acceptable standard.

9.33 Due to the above, it is considered the development could not be refused on highway grounds when taking into account Paragraph 109 of the National Planning Policy Framework.

Parking Provision

9.34 Policy CS12 seeks to ensure developments have sufficient parking provision. The Framework states that if setting local parking standards authorities should take into account the accessibility of the development, the type, mix and use of the development, availability of public transport; local car ownership levels and the overall need to reduce the use of high emission vehicles.

9.35 Dacorum's local parking standards (as set out in saved Appendix 5 of the Local Plan) require, as a maximum, 1.25 parking spaces per 1-bedroom dwelling, 1.5 spaces per 2-bedroom dwelling and 2.25 spaces per 3-bedroom dwelling.

9.36 The development proposed would provide 7 two bedroom dwellings and 3 three bedroom dwellings. 19 car parking spaces would be provided within the development and this exceeds the maximum standard outlined in Appendix 5 of the Local Plan. Exceeding this maximum standard is

considered acceptable when considering the on street parking stress that currently exists on the road.

9.37 Infrastructure related to electric vehicle charging would be provided for each dwelling. This would enable the provision of future charging points for each dwelling as demand for electric vehicles increases.

Affordable Housing

9.38 Policy CS19 relates to the provision of affordable housing. The guidance contained within this policy is outdated. However, Figure 2 contained within Dacorum's Affordable Housing Clarification note (2019) updates this guidance and states that for a development of 10 units or more on site provision of 35% affordable housing will be sought.

9.39 A Section 106 Agreement relating to the provision of 100% on site affordable housing (social rent) is currently being drafted. Any permission granted would be subject to the signing of this agreement.

Ecology

9.40 Paragraph 170 of the National Planning Policy Framework (2019) states that planning decisions should contribute to and enhance the natural and local environment. Policy CS26 of the Core Strategy (2013) states that development should contribute towards to the conservation and restoration of habitats and species.

9.41 Hertfordshire Ecology have been consulted on the application and it is considered the ecological value of the site is such that it would not represent a constraint to development; its ecological value would exist at site level only.

9.42 A landscape plan has been submitted which outlines new planting of trees, hedges and wildflower, as well as the inclusion of bat/bird boxes and log piles which is welcomed. An amended site plan and landscape plan has been submitted to show a new hedge to be planted along the northern boundary of the site. This would provide mitigation for the loss of the existing hedgerow that runs through the site. The Ecology Officer considered this Hedgerow to be species poor and unlikely to be considered 'important' under the hedgerow regulations.

9.43 It is considered the use of horizontal LED luminaires are appropriate to limit significant aspects of light pollution such as light spill, direct glare and the type of light provided.

Drainage

9.44 Policy CS31 of the Core Strategy (2013) places states that development would be required to avoid Flood Zones 2 and 3 , minimise water run-off, reduce the impact of flooding, and avoid damage to Ground Water Protection Zones.

9.45 The Lead Local Flood Authority were consulted on the application and have objected to it and have required an amended drainage strategy. The Flood Authority have stated they would object in principle to discharge via infiltration unless the applicant can demonstrate ground water would not become contaminated. Amended drainage details have been received and the Flood Authority have been re-consulted.

9.46 The recommendation for delegate with a view to approval would be subject to satisfactory comments being received from the Flood Authority on the amended details.

Contaminated Land

9.47 Policy CS32 of the Core Strategy (2013) states that development will be required to maintain soil quality standards and remediate contaminated land.

9.48 The Scientific Officer has requested conditions relating to the submission of a Phase II environmental risk assessment and remediation method statement to ensure the issue of contamination is adequately addressed.

Community Infrastructure Levy

9.49 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.

10. CONCLUSION

10.1 Overall, the development is acceptable in principle. The site is allocated for housing and would optimise the use of currently under-utilised land while also contributing to affordable housing provision within the local area. The design and layout of the proposal respects the character of the surrounding area while providing a certain level of innovation in built form, thus creating visual interest. No harm relating to the street scene or residential amenity can be identified. While the loss of the four poplar trees to the front of the site is unfortunate, these would be replaced with a species more suited to be located within close proximity to residential development.

10.2 The application is thus recommended to be delegated with a view to approval subject to the signing of a Section 106 Agreement (100% affordable housing – social rent) and satisfactory comments/recommended conditions being received from the Flood Authority.

11. RECOMMENDATION – Delegate with a view to approval subject to the completion of a Section 106 Agreement (100% affordable housing – social rent) and satisfactory comments/recommended conditions being received from the Lead Local Flood Authority and subject to the following conditions:

Conditions

1. The development hereby permitted shall begin before the expiration of three years from the date of this permission.

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

2. The development hereby permitted shall be carried out in accordance with the following approved plans/documents:

18058WD2.06 Rev B
18058WD2.08 Rev C
18058WD2.10 Rev B
18058WD2.12 Rev B
18058WD2.14 Rev B
18058WD2.05 Rev B
18058WD2.07 Rev C
18058WD2.09 Rev B

18058WD2.11 Rev B
18058WD2.13 Rev B
18058wd2.01 Rev O
18058wd2.02 Rev D

INSERT NEW SITE PLAN/STREET SCENE NUMBERS

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

3. No development (excluding demolition/ground investigations) shall take place until details of the materials to be used in the construction of the external surfaces of the development hereby permitted have been submitted and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

Reason: To ensure satisfactory appearance to the development and to safeguard the visual character of the area in accordance with Policies CS11 and CS12 of the Dacorum Borough Core Strategy (2013).

4. No development above slab level shall take place until details of all materials to be used for hard surfaced areas within the site including full details of the finalised materials have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

Reason: To make sure that the appearance of the building is suitable and that it contributes to the character of the area in accordance with Policies CS11 and CS12 of the Dacorum Borough Core Strategy (2013).

5. The landscaping works shown on drawing LSDP 1403-01 Rev E must be carried out within one planting season of completing the development.

Any tree or shrub which forms part of the approved landscaping scheme which within a period of 5 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.

Reason: To improve the appearance of the development and its contribution to biodiversity and the local environment, as required by saved Policy 99 of the Dacorum Borough Local Plan (2004) and Policy CS12 (e) of the Dacorum Borough Council Core Strategy (2013).

6. Tree protection measures shall be carried out in accordance with the submitted Arboricultural Method Statement (BHA Trees Ltd ref 3865B & 3833C V2) and Tree Protection Plan (BHA Trees Ltd - 19/02/20),

Reason: In order to ensure that damage does not occur to trees and hedges during building operations in accordance with saved Policy 99 of the Dacorum Borough Local Plan (2004), Policy CS12 of the Dacorum Borough Core Strategy (2013) and Paragraph 170 of the National Planning Policy Framework (2019).

7. No development (except demolition and site clearance) shall take place until details of the proposed slab, finished floor and ridge levels of the building(s) 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 building(s) shall be constructed in accordance with the approved levels.

Reason: For the avoidance of doubt, to ensure a satisfactory form of development and in the interests of the residential amenity of the surrounding dwellings, in accordance with saved Appendix 3 of the Dacorum Local Plan (2004), Policies CS11, CS12 and of the Dacorum Core Strategy (2013).

8. Details of the proposed electric vehicle charging infrastructure and associated maintenance arrangement for the development shall be submitted to and approved in writing by the Local Planning Authority and thereafter implemented prior to first occupation in accordance with the agreed details.

Reason: To enable future occupiers to charge low emission vehicles in a safe and accessible way in accordance with Policy CS8 of the Dacorum Borough Core Strategy (2013) and Paragraph 110 (e) of the National Planning Policy Framework (2019).

9. Prior to the first occupation of the development hereby permitted the vehicular access shall be provided and thereafter retained at the position shown on the approved plan drawing number 18058wd2.01 Rev L. Arrangement shall be made for surface water drainage to be intercepted and disposed of separately so that it does not discharge from or onto the highway carriageway.

Reason: To ensure satisfactory access into the site and avoid carriage of extraneous material or surface water from or onto the highway in accordance with Policies CS8, CS12 and CS31 of the Core Strategy (2013)

10. Prior to the first occupation of the development hereby permitted the proposed access and onsite car and cycle parking areas shall be laid out, demarcated, levelled, surfaced and drained in accordance with the approved plan and retained thereafter available for that specific use.

Reason: To ensure construction of a satisfactory development and in the interests of highway safety in accordance with Policies CS8 and CS12 of the Core Strategy (2013).

11. Road Safety: No development shall commence until full details have been submitted to and approved in writing by the Local Planning Authority to illustrate the following: i) Any alterations required to the existing raised table and/or possible relocation would be subject to the submission and approval of a Stage 1 Road Safety Audit.

Reason: To ensure suitable, safe and satisfactory planning and development of the site in accordance with Policies CS8 and CS12 of the Core Strategy (2013).

12. (a) No development approved by this permission shall be commenced until a Site Investigation (Phase II environmental risk assessment) report has been submitted to and approved by the Local Planning Authority which includes:

- (i) A full identification of the location and concentration of all pollutants on this site and the presence of relevant receptors, and;

- (ii) The results from the application of an appropriate risk assessment methodology

- (b) No development approved by this permission (other than that necessary for the discharge of this condition) shall be commenced until a Remediation Method Statement report; if required as a result of (a), above; has been submitted to and approved by the Local Planning Authority.

- (c) This site shall not be occupied, or brought into use, until:

(i) All works which form part of the Remediation Method Statement report pursuant to the discharge of condition (b) above have been fully completed and if required a formal agreement is submitted that commits to ongoing monitoring and/or maintenance of the remediation scheme.

(ii) A Remediation Verification Report confirming that the site is suitable for use has been submitted to, and agreed by, the Local Planning Authority.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with Policy CS32 of the Dacorum Borough Core Strategy (2013) and Paragraphs 178 and 180 of the National Planning Policy Framework (2019).

13. Any contamination, other than that reported by virtue of Condition 12 encountered during the development of this site shall be brought to the attention of the Local Planning Authority as soon as practically possible; a scheme to render this contamination harmless shall be submitted to and agreed by, the Local Planning Authority and subsequently fully implemented prior to the occupation of this site. Works shall be temporarily suspended, unless otherwise agreed in writing during this process because the safe development and secure occupancy of the site lies with the developer.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with Policy CS32 of the Dacorum Borough Core Strategy (2013) and Paragraphs 178 and 180 of the National Planning Policy Framework (2019).

14. Lighting for the development shall be inserted in accordance with the submitted lighting plan (Thoriux Lighting - 16/01/20).

Reason: To ensure that the lighting is designed to minimise problems of glare, protect residential amenity, to minimise impacts on biodiversity and avoid unnecessary light pollution in accordance with Policies CS12 and CS26 of the Dacorum Borough Core Strategy (2013) and Paragraph 172 of the National Planning Policy Framework (2019).

15. 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:

Schedule 2, Part 1, Class B

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 in accordance with Policy CS12 of the Dacorum Borough Core Strategy (2013) and Paragraph 127 of the National Planning Policy Framework (2019).

Informatives:

1. Planning permission has been granted for this proposal. The Council acted pro-actively through positive engagement with the applicant during the determination process which led to improvements to the scheme. The Council has therefore acted pro-actively in line with the requirements of the Framework (paragraph 38) and in accordance with the Town and Country Planning (Development Management Procedure) (England) (Amendment No. 2) Order 2015.
2. You should be aware that the proposed development site is located within an Environment Agency defined groundwater Source Protection Zone (GPZ) corresponding to Hunton Bridge Pumping Station. This is a public water supply, comprising a number of Chalk abstraction boreholes, operated by Affinity Water Ltd.

The construction works and operation of the proposed development site should be done in accordance with the relevant British Standards and Best Management Practices, thereby significantly reducing the groundwater pollution risk. It should be noted that the construction works may exacerbate any existing pollution. If any pollution is found at the site then the appropriate monitoring and remediation methods will need to be undertaken.

For further information we refer you to CIRIA Publication C532 "Control of water pollution from construction - guidance for consultants and contractors"

3. With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services>

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

We would expect the developer to demonstrate what measures will be undertaken 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 020 3577 9483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

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 1730hrs on Monday to Friday, 08:00 - 13:00 Saturday and no works are permitted at any time on Sundays or bank holidays.

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.

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.

5. The Environmental Health Team has a web-page that aims to provide advice to potential developers, which includes a copy of a Planning Advice Note on "Development on Potentially Contaminated Land and/or for a Sensitive Land Use" in use across Hertfordshire and Bedfordshire. This can be found on www.dacorum.gov.uk by searching for contaminated land.

APPENDIX A: CONSULTEE RESPONSES

Consultee	Comments
Environment Agency	<p>We recommend, however, that the requirements of the National Planning Policy Framework and National Planning Policy Guidance (NPPG) are still followed. This means that all risks to groundwater and surface waters from contamination need to be identified so that appropriate remedial action can be taken. This should be in addition to the risk to human health that your Environmental Health Department will be looking at.</p> <p>We expect reports and Risk Assessments to be prepared in line with our Groundwater Protection guidance (previously covered by the GP3) and CLR11 (Model Procedures for the Management of Land Contamination).</p> <p>In order to protect groundwater quality from further deterioration:</p> <ul style="list-style-type: none"> - No infiltration-based sustainable drainage systems should be constructed on land affected by contamination, as contaminants can remobilise and cause groundwater pollution. - Piling, or any other foundation designs using penetrative methods, should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution.

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

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

- From www.gov.uk:

- The Environment Agency's approach to groundwater protection (2017)

- Our Technical Guidance Pages, which includes links to CLR11 (Model Procedures for the Management of Land Contamination) and GPLC (Environment Agency's Guiding Principles for Land Contamination) in the 'overarching documents' section

- Use MCERTS accredited methods for testing contaminated soils at the site

- From the National Planning Practice Guidance:

- Land affected by contamination

- British Standards when investigating potentially contaminated sites and groundwater:

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

- BS 10175:2011+A2:2017 Code of practice for investigation of potentially contaminated sites

- BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points

- BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters (A minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns and groundwater quality.)

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

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

Advice for Applicant - Deep Borehole Soakaways

	<p>Infiltration via deep borehole soakaways are not acceptable, other than when a drainage and hydrogeological risk assessment shows this to be the only viable option and that any risks to groundwater will be adequately mitigated.</p> <p>In line with position statement G9 in The Environment Agency's approach to groundwater protection (formerly GP3) we would usually only agree to the use of deep infiltration systems for surface water if you can demonstrate the following:</p> <ul style="list-style-type: none"> - There are no other feasible options such as shallow infiltration systems or drainage fields / mounds that can be operated in accordance with the with the appropriate British standard; (e.g. discharge to a shallow infiltration system, surface water or sewer) - The system is no deeper than is required to obtain sufficient soakage; - Acceptable pollution control measures are in place; <p>Risk assessment demonstrates that no unacceptable discharge to groundwater will take place; and,</p> <ul style="list-style-type: none"> - There are sufficient mitigating factors or measures to compensate for the increase risk arising from the use of deep structures. <p>The above should be read in conjunction with the position statement G1. Please note that we cannot issue an Environmental Permit for the direct discharge of hazardous substances into groundwater.</p> <p>G1 - Direct inputs into groundwater</p> <p>The Environment Agency must take all necessary measures to:</p> <ul style="list-style-type: none"> - prevent the input of any hazardous substance to groundwater - limit the input of non-hazardous pollutants to groundwater so as to ensure that such inputs do not cause pollution of groundwater <p>The Environment Agency will only agree to the direct input of non-hazardous pollutants into groundwater if all of the following apply:</p> <ul style="list-style-type: none"> - it will not result in pollution of groundwater - there are clear and overriding reasons why the discharge cannot reasonably be made indirectly - there is adequate evidence to show that the increased pollution risk from direct inputs will be mitigated <p>Please refer to our 'Groundwater Protection' webpages for further information.</p>
<p>Affinity Water - Three Valleys Water PLC</p>	<p>Thank you for notification of the above planning application. Planning applications are referred to us where our input on issues relating to water quality or quantity may be required.</p>

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

	<p>"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 020 3577 9483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.</p> <p>Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p>
<p>Hertfordshire Highways (HCC)</p>	<p>Notice is given under article 18 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that the Hertfordshire County Council as Highway Authority does not wish to restrict the grant of permission subject to the following conditions:</p> <p>1. New Access: Prior to the first occupation of the development hereby permitted the vehicular access shall be provided and thereafter retained at the position shown on the approved plan drawing number 18058wd2.01 Rev L. Arrangement shall be made for surface water drainage to be intercepted and disposed of separately so that it does not discharge from or onto the highway carriageway.</p> <p>Reason: To ensure satisfactory access into the site and avoid carriage of extraneous material or surface water from or onto the highway in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).</p> <p>2. Provision of Parking and Servicing Areas - When shown on plan: Prior to the first occupation of the development hereby permitted the proposed access and onsite car and cycle parking areas shall be laid out, demarcated, levelled, surfaced and drained in accordance with the approved plan and retained thereafter available for that specific use.</p> <p>Reason: To ensure construction of a satisfactory development and in the interests of highway safety in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).</p>

3. Road Safety: No development shall commence until full details have been submitted to and approved in writing by the Local Planning Authority to illustrate the following: i) Any alterations required to the existing raised table and/or possible relocation would be subject to the submission and approval of a Stage 1 Road Safety Audit.

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

HIGHWAY INFORMATIVES: Hertfordshire County Council (HCC) as Highway Authority recommends inclusion of the following Advisory Notes (AN) to ensure that any works within the highway are carried out in accordance with the provisions of the Highway Act 1980.

AN1) Extent of Highway: Information on obtaining the extent of public highway around the site can be obtained from the HCC website: www.hertfordshire.gov.uk/services/highways-roads-and-pavements/changes-to-your-road/extent-of-highways.aspx.

AN2) Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence. Further information is available via the website <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/business-licences/business-licences.aspx> or by telephoning 0300 1234047.

AN3) Obstruction of public highway land: It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence. Further information is available via the website <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/business-licences/business-licences.aspx> or by telephoning 0300 1234047.

AN4) Road Deposits: It is an offence under section 148 of the Highways Act 1980 to deposit mud or other debris on the public highway, and section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure

that all vehicles leaving the site during construction of the development are in a condition such as not to emit dust or deposit mud, slurry or other debris on the highway. Further information is available via the website <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/highways-roads-and-pavements.aspx>.

AN5) Construction standards for works within the highway: The applicant is advised that in order to comply with this permission it will be necessary for the developer of the site to enter into an agreement with Hertfordshire County Council as Highway Authority under Section 278 of the Highways Act 1980 to ensure the satisfactory completion of the access and associated road improvements. The construction of such works must be undertaken to the satisfaction and specification of the Highway Authority, and by a contractor who is authorised to work in the public highway. Before works commence the applicant will need to apply to the Highway Authority to obtain their permission and requirements. Further information is available via the website <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx> or by telephoning 0300 1234047.

COMMENTS / ANALYSIS: The proposals in the application are for the construction of 10 new dwellings, consisting of seven two-bed and three three-bed houses, with an associated access road, parking, and landscaping at land in the corner of Coniston Road and Barnes Lane, Kings Langley.

A Transport Statement (TS), Design and Access Statement (DAS), and plans and drawings of the proposed and existing site have been submitted as part of the application.

ACCESS ARRANGEMENTS: The proposals include a new proposed access and access road from Coniston Road, which would lead to the dwellings and parking spaces. Coniston Road is an unclassified local access road with a speed limit of 20mph and is highway maintainable at public expense.

The proposed new access is at the location of the existing raised table on Coniston Road and the new access road would be 4.8m in width with 2m wide footways and sections of shared use. The proposed access is a bellmouth access and would need to have tactile paving on the footway at the entrance. This should all be installed by Hertfordshire County Council (HCC) or a contractor approved by HCC. The applicant would need to enter into a Section 278 agreement regarding the proposed new access, further details regarding this are in the relevant informative.

HCC notes that the proposed access is onto the existing raised table on Coniston Road. The raised table would either need to be widened or relocated to an appropriate location. Any alterations required to the existing raised table and/or possible relocation would be subject to the submission and approval of a Stage 1 Road Safety Audit, as mentioned in the above condition.

The applicant has provided visibility splay drawings at the proposed access in Figure 3.1, which demonstrate visibility of 2.4 x 25m. The level of visibility is acceptable to HCC.

HCC also notes that there is an unmarked bus stop located by the site entrance, however it is in a hail and ride area so the proposed access would unlikely disrupt the service.

PARKING AND MANOEUVRABILITY: Kings Langley is located with Zone 4 of Dacorum Borough Council's (DBC) parking accessibility zones. For the two-bed houses, 1.5 parking space is the maximum, and for the three-bed houses 2.25 spaces would be the maximum. From this, the total maximum number of parking spaces at the site would be 17. From drawing 18058wd2.01 Rev H it appears that 18 total spaces are provided, one of which is a car port. Four spaces are identified as visitor parking spaces.

HCC notes that the proposed level of parking is acceptable if the visitor parking is used by residents. Otherwise, there is a risk on-street / pavement parking on both the access road and Coniston Road, which would have safety implications. The applicant is reminded that DBC are the parking authority for the borough and therefore ultimately should be satisfied with any proposed changes to the parking arrangement on the site.

REFUSE COLLECTION: Swept path analysis drawings for refuse vehicles have been provided in Figures 3.2 and 3.3 of the TS. The drawings demonstrate that a large refuse vehicle would be able to enter the site from either direction on Coniston Road, manoeuvre around the site, and leave the site in a forward gear. This would allow refuse vehicles to be within 25m of all dwellings. The drawings demonstrate that vehicles are able to safely manoeuvre around the site to an acceptable standard.

EMERGENCY VEHICLE ACCESS: The drawings provided for the refuse swept path analyses mentioned above (Figures 3.2 and 3.3) are sufficient to also demonstrate that emergency vehicles would be able to safely manoeuvre around the site and leave in a forward gear. This would enable emergency vehicles to be within 45 metres from all dwellings. This adheres to guidelines as recommended in 'MfS', 'Roads

in Hertfordshire: Highway Design Guide' and 'Building Regulations 2010: Fire Safety Approved Document B Vol 1 - Dwelling houses'.

TRIP GENERATION: The site currently does not generate any trips. The trip generation for the proposed site has been outlined in the TS using the TRICS database.

For the proposed site, the following parameters were used: o Residential - Afford / Local Authority Houses; o Edge of Town Centre, Suburban Area, and Edge of Town site; and o Sites in England (excluding Greater London). HCC notes that the parameters used for the proposed site are acceptable.

The vehicular trip rates and trip generation calculated for the proposed 10 dwellings are as follows: o Trip Rates: o AM Peak (08:00-09:00) Arrivals: 0.174 and Departures: 0.351 o PM Peak (17:00-18:00) Arrivals: 0.211 and Departures: 0.175 o Trip Generation: o AM Peak (08:00-09:00) Arrivals: 2 and Departures: 4 o PM Peak (17:00-18:00) Arrivals: 2 and Departures: 2

The trip generation calculations show that the site would generate 6 new trips in the AM Peak and 4 new trips in the PM Peak onto the network. The existing site currently does not generate any trips. HCC notes that the trip generation for the proposed site is unlikely to have a significant impact on the performance of the highway network.

SUSTAINABILITY AND ACCESSIBILITY: There are 10 proposed cycle parking spaces proposed at the development. In the TS, the local pedestrian and cycling facilities are highlighted, and it is noted that Kings Langley High Street is approximately 700m from the site, meaning that the site is within walking and cycling distance to local services and amenities. The TS notes that the pedestrian infrastructure is of a good quality, with paved footways between the site and key destinations such as the High Street, Kings Langley Primary School, and Kings Langley Secondary School. It is noted that the cycle infrastructure is limited, but most roads in Kings Langley are either subject to a speed limit of 20mph or 30mph, so likely to be suitable for cyclists.

Kings Langley railway station is approximately a 30-minute walk or a 10-minute cycle from the site. Kings Langley railway station is situated on the West Coast Main Line. Two trains per hour run to London Euston to the south, and two trains an hour run north to Tring. Apsley railway station is roughly the same distance away, with a similar level of services.

	<p>The nearest bus stop to the site is an unmarked stop directly outside the site on Coniston Road. The stop is served by the H19 bus twice a week. There are other bus stops on the High Street approximately a 10-minute walk away that run more regularly, including the 500 which runs between Aylesbury and Watford.</p> <p>CONCLUSION: HCC as Highway Authority considers that the proposal would not have an unacceptable impact on the safety and operation of the surrounding highway network. Therefore, HCC has no objections on highway grounds to the application, subject to the inclusion of the above planning conditions.</p> <p>23.12.2019:</p> <p>Notice is given under article 18 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that the Hertfordshire County Council as Highway Authority does not wish to restrict the grant of permission subject to the following conditions:</p> <p>No additional comments to the original response with conditions sent on 03/12/2019.</p>
<p>Environmental And Community Protection (DBC)</p>	<p>Having reviewed the documentation submitted with the above planning application, in particular the RSK supplementary site investigation letter report dated October 2019, and having considered the pre-application advice provided in response to 4/01586/19/PRE I have the following advice and recommendations.</p> <p>The additional report has provided reassurance as to the nature of the waste deposited on the site and has provided some additional information about the extent of the area of the site impacted by the waste disposal activities. However:</p> <ul style="list-style-type: none"> o It has not established the southern extent of the landfilling activities sufficiently to be able to define the waste fill boundary as shown in Figure 3 of the October 2019 report. o Of the recommendations/advice provided in my pre-application response of 13/08/2019 the following have not been addressed in the October 2019 report: o The recommendations for further land contamination investigation within the above referenced reports are considered to be prudent and the report detailing its outcome should be submitted in support of a full application. Or alternatively it should be expected that

it will need to be submitted in support of a future application to discharge a land contamination planning condition in the event that permission is granted.

o In addition to the stated purpose of delineating the extent of the landfilled area of the site, the recommended site investigation would also provide the opportunity to increase the confidence in the current interpretation of the land contamination risks posed to the end use by the topsoil and made ground. This comment is based on the fact that at present the datasets for these two ground types are fairly limited relative to a site investigation for a residential development with private garden end use.

o The drainage scheme for the proposed development is based on permeable paving and soakaways and there has been no detailed assessment of the suitability of this approach in relation to the presence of significant depths of anthropogenic waste material and the identification of elevated lead.

o It is surprising that the opportunity for a further round of landfill gas monitoring was not taken whilst on site carrying out the supplementary site investigation.

On the basis of the above comments, which I would be grateful if you would communicate to the applicant/developer, it is recommended that the following conditions are included on any permission that might be granted:

Contaminated Land Conditions:

Condition 1:

(a) No development approved by this permission shall be commenced until a Site Investigation (Phase II environmental risk assessment) report has been submitted to and approved by the Local Planning Authority which includes:

(i) A full identification of the location and concentration of all pollutants on this site and the presence of relevant receptors, and;

(ii) The results from the application of an appropriate risk assessment methodology

(b) No development approved by this permission (other than that necessary for the discharge of this condition) shall be commenced until a Remediation Method Statement report; if required as a result of (a), above; has been submitted to and approved by the Local Planning Authority.

(c) This site shall not be occupied, or brought into use, until:

(i) All works which form part of the Remediation Method Statement report pursuant to the discharge of condition (b) above have been fully completed and if required a formal agreement is submitted that commits to ongoing monitoring and/or maintenance of the remediation scheme.

(ii) A Remediation Verification Report confirming that the site is suitable for use has been submitted to, and agreed by, the Local Planning Authority.

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

Condition 2:

Any contamination, other than that reported by virtue of Condition 1 encountered during the development of this site shall be brought to the attention of the Local Planning Authority as soon as practically possible; a scheme to render this contamination harmless shall be submitted to and agreed by, the Local Planning Authority and subsequently fully implemented prior to the occupation of this site. Works shall be temporarily suspended, unless otherwise agreed in writing during this process because the safe development and secure occupancy of the site lies with the developer.

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

Informatives:

The above conditions are considered to be in line with paragraphs 170 (e) & (f) and 178 and 179 of the NPPF 2019.

The Environmental Health Team has a web-page that aims to provide advice to potential developers, which includes a copy of a Planning Advice Note on "Development on Potentially Contaminated Land and/or for a Sensitive Land Use" in use across Hertfordshire and Bedfordshire. This can be found on www.dacorum.gov.uk by searching for contaminated land.

No objections on noise or air quality grounds.

	<p>As the site has existing residential neighbours in the vicinity and owing to scale of the project I would advise including the informative for construction noise and dust.</p> <p>Construction Hours of Working - (Plant & Machinery) Informative</p> <p>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 1730hrs on Monday to Friday, 08:00 - 13:00 Saturday and no works are permitted at any time on Sundays or bank holidays.</p> <p>Construction Dust Informative</p> <p>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.</p> <p>Noise on Construction/Demolition Sites Informative</p> <p>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.</p>
Hertfordshire Ecology	<p>1. We have no existing ecological information available for this site. It is currently open land, supporting planted trees, native shrubs along existing field boundaries, an area of communal open grassland and a horse paddock. The development itself will lead to a net loss of biodiversity due to the impacts on open grassland, trees and shrubs, including 19 hawthorn and 6 elder bushes.</p> <p>2. The proposal has been submitted with a Preliminary Ecological Assessment (PEA). The bat potential in the horse stable is considered to be negligible. From the photograph I agree with this assessment. The grassland interest is considered to be improved or poor semi-improved</p>

grassland. It is not entirely without some interest in supporting cuckooflower, wild strawberry, meadow buttercup etc. but I am satisfied that the grasslands are broadly as described and have little or no botanical interest. However this may be masked by the usual overgrazed horse paddock sward which makes identification of species difficult. The hedgerow through the site- whilst species poor - still provides a local ecological feature within the site which will be lost. Whilst it may be considered a priority habitat, it cannot be regarded as making the site of national value as stated as this really only relates to SSSI status; it is also most unlikely that the hedgerow would be considered 'Important' under the hedgerow regulations.

3. The ecological value of the site is such that it would not represent a constraint on the development. I would consider its value to be at the site level. However the loss of biodiversity and enhancement should still be addressed in pursuance of the need to deliver biodiversity net gain from the development as now expected by NPPF

4. The PEA recommendations are sound; however I do not consider they are sufficient to deliver net gain in respect of the losses to development of trees, shrubs and open grassland. These are local habitat resources compared to smaller, peripheral features which do not provide the same biodiversity extent of resource lost from the site.

5. I note the landscape plan proposes a hornbeam hedge along part of the south-east boundary and wildflower grassland either side of the access road. Whilst these are welcome, I do not consider the hedge will compensate for the existing one which will be lost given this is clearly a much larger feature. There is no detail as to how the grassland will be managed - which is key for any significant benefit to accrue from wildflower planting. No planting is proposed along the open field section of the NW boundary. However, I note the plan shows provision of bat and bird boxes and habitat piles, which is acceptable.

6. Consequently, I consider that the north west boundary should be defined as a wide, species-rich native hedgerow with some potential trees. This would replace the hedgerow lost and can be planted within the meadow area under the ownership of the applicant. The proposed wildflower grassland must also be accompanied by management notes on the landscape plan to ensure the grassland is enabled to flower and set seed - otherwise there is little point in sowing what would otherwise become gang-mown amenity grassland. This should be included as a revised landscape and ecology management plan (LEMP) as a condition of approval. It is the minimum I would consider sufficient to deliver biodiversity net gain; if these are not included within the LEMP, I would expect to see a metric produced to demonstrate how the net gain can be otherwise delivered as a result of the existing landscaping within the application site itself.

7. If desired, further habitat provision could be in the form of an orchard within the adjacent grass field on the adjacent land to the north-west which is within the ownership of the applicant. This could be a strip along the boundary, say three trees wide which would provide additional ecological and landscape value for the development and benefit the new houses. This could be perhaps 20m in width and 60m long, sufficient for 30 fruit trees at 6m spacing, or variations of this depending on rootstock size. This would benefit the development as a whole and create an additional buffer of landscape and ecological benefit against the new houses.

8. I can confirm that the use of horizontal LED luminaires are appropriate to limit significant aspects of light pollution such as light spill, direct glare and the type of light provided, although glare is often still visible from the side of such luminaires.

9. Further to the above, I do not consider there to be any other ecological constraints associated with the proposals.

<p>Trees & Woodlands</p>	<p>I understand the concern of residents regarding the removal of the Lombardy Poplar trees, as they are visually significant. However, this is one particular tree species quite unsuited to being near dwellings.</p> <p>Lombardy's grow very tall and quite quickly. A consequence of this is a fairly weak timber structure, so branch loss is fairly common.</p> <p>Below are three images of The Foxgloves / The Coltsfoot in Hemel Hempstead. The first two show a composite view of a row of Lombardy Poplar's in 2012. The row were actually TPO'd when the residential development was approved. The third image is an aerial view from 2019, showing only eight long tree shadows towards the right hand side; these are the remaining Poplars following removals. So many of the trees were dropping debris into rear gardens or in an unsafe condition that removal has been approved site by site, being replaced by another species.</p> <p>Anecdotally, Welwyn Hatfield Council are in the process of removing over 200 Lombardy's in their management due to issues with falling debris in public areas.</p> <p>I agree that the trees are significant, but would say that they're not compatible with new dwellings, access roads and parking being so close, especially as the Poplars will decline in condition as they grow older and taller.</p> <p>Hornbeam (<i>Carpinus betulus</i>) would be suitable replacement. The alternative species used as replacement in The Foxgloves / The Coltsfoot was <i>Quercus robur Fastigiata</i> Koster, a narrow upright Oak. Example image below. Same shape as Lombardy Poplar but a tougher tree.</p>
<p>Environmental And Community Protection (DBC)</p>	<p>Having reviewed the documentation submitted with the above planning application, in particular the RSK supplementary site investigation letter report dated October 2019, and having considered the pre-application advice provided in response to 4/01586/19/PRE I have the following advice and recommendations.</p> <p>The additional report has provided reassurance as to the nature of the waste deposited on the site and has provided some additional information about the extent of the area of the site impacted by the waste disposal activities. However:</p>

o It has not established the southern extent of the landfilling activities sufficiently to be able to define the waste fill boundary as shown in Figure 3 of the October 2019 report.

o Of the recommendations/advice provided in my pre-application response of 13/08/2019 the following have not been addressed in the October 2019 report:

o The recommendations for further land contamination investigation within the above referenced reports are considered to be prudent and the report detailing its outcome should be submitted in support of a full application. Or alternatively it should be expected that it will need to be submitted in support of a future application to discharge a land contamination planning condition in the event that permission is granted.

o In addition to the stated purpose of delineating the extent of the landfilled area of the site, the recommended site investigation would also provide the opportunity to increase the confidence in the current interpretation of the land contamination risks posed to the end use by the topsoil and made ground. This comment is based on the fact that at present the datasets for these two ground types are fairly limited relative to a site investigation for a residential development with private garden end use.

o The drainage scheme for the proposed development is based on permeable paving and soakaways and there has been no detailed assessment of the suitability of this approach in relation to the presence of significant depths of anthropogenic waste material and the identification of elevated lead.

o It is surprising that the opportunity for a further round of landfill gas monitoring was not taken whilst on site carrying out the supplementary site investigation.

On the basis of the above comments, which I would be grateful if you would communicate to the applicant/developer, it is recommended that the following conditions are included on any permission that might be granted:

Contaminated Land Conditions:

Condition 1:

(a) No development approved by this permission shall be commenced until a Site Investigation (Phase II environmental risk assessment) report has been submitted to and approved by the Local Planning Authority which includes:

- (i) A full identification of the location and concentration of all pollutants on this site and the presence of relevant receptors, and;
- (ii) The results from the application of an appropriate risk assessment methodology

(b) No development approved by this permission (other than that necessary for the discharge of this condition) shall be commenced until a Remediation Method Statement report; if required as a result of (a), above; has been submitted to and approved by the Local Planning Authority.

(c) This site shall not be occupied, or brought into use, until:

(i) All works which form part of the Remediation Method Statement report pursuant to the discharge of condition (b) above have been fully completed and if required a formal agreement is submitted that commits to ongoing monitoring and/or maintenance of the remediation scheme.

(ii) A Remediation Verification Report confirming that the site is suitable for use has been submitted to, and agreed by, the Local Planning Authority.

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

Condition 2:

Any contamination, other than that reported by virtue of Condition 1 encountered during the development of this site shall be brought to the attention of the Local Planning Authority as soon as practically possible; a scheme to render this contamination harmless shall be submitted to and agreed by, the Local Planning Authority and subsequently fully implemented prior to the occupation of this site. Works shall be temporarily suspended, unless otherwise agreed in writing during this process because the safe development and secure occupancy of the site lies with the developer.

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

Informatives:

The above conditions are considered to be in line with paragraphs 170 (e) & (f) and 178 and 179 of the NPPF 2019.

	<p>The Environmental Health Team has a web-page that aims to provide advice to potential developers, which includes a copy of a Planning Advice Note on "Development on Potentially Contaminated Land and/or for a Sensitive Land Use" in use across Hertfordshire and Bedfordshire. This can be found on www.dacorum.gov.uk by searching for contaminated land.</p>
<p>UK Power Networks</p>	<p>If the proposed works are located within 6m of the substation, then they are notifiable under the Party Wall etc. Act 1996. The Applicant should provide details of the proposed works and liaise with the Company to ensure that appropriate protective measures and mitigation solutions are agreed in accordance with the Act. The Applicant would need to be responsible for any costs associated with any appropriate measures required. Any Party Wall Notice should be served on UK Power Networks at its registered office: UK Power Networks, Newington House, 237 Southwark Bridge Road, London SE1 6NP.</p> <p>Our engineering guidelines state that the distance between a dwelling of two or more stories with living or bedroom windows overlooking a distribution substation should be a minimum of ten metres if the transformer is outdoor, seven metres if the transformer has a GRP surround or one metre if the transformer is enclosed in a brick building. It is a recognised fact that transformers emit a low level hum which can cause annoyance to nearby properties. This noise is mainly airborne in origin and is more noticeable during the summer months when people tend to spend more time in their gardens and sleep with open windows.</p> <p>A problem can also occur when footings of buildings are too close to substation structures. Vibration from the transformer can be transmitted through the ground and into the walls of adjacent buildings. This, you can imagine, is very annoying.</p> <p>In practice there is little that can be done to alleviate these problems after the event. We therefore offer advice as follows:</p> <ol style="list-style-type: none"> 1.The distance between buildings and substations should be greater than seven metres or as far as is practically possible. 2.Care should be taken to ensure that footings of new buildings are kept separated from substation structures.

	<p>3. Buildings should be designed so that rooms of high occupancy, i.e. bedrooms and living rooms, do not overlook or have windows opening out over the substation.</p> <p>4. If noise attenuation methods are found to be necessary we would expect to recover our costs from the developer.</p> <p>Other points to note:</p> <p>5. UK Power Networks require 24 hour vehicular access to their substations. Consideration for this should be taken during the design stage of the development.</p> <p>6. The development may have a detrimental impact on our rights of access to and from the substation. If in doubt please seek advice from our Operational Property and Consents team at Barton Road, Bury St Edmunds, Suffolk, IP32 7BG.</p> <p>7. No building materials should be left in a position where they might compromise the security of the substation or could be used as climbing aids to get over the substation surround.</p> <p>8. There are underground cables on the site associated with the substation and these run in close proximity to the proposed development. Prior to commencement of work accurate records should be obtained from our Plan Provision Department at UK Power Networks, Fore Hamlet, Ipswich, IP3 8AA.</p> <p>9. All works should be undertaken with due regard to Health & Safety Guidance notes HS(G)47 Avoiding Danger from Underground services. This document is available from local HSE offices.</p>
<p>Conservation & Design (DBC)</p>	<p>The proposal involves the construction of 10 dwellings on an open area of land which in part includes a field. There are a number of trees on the site which add to the ambiance of the area.</p> <p>The proposed new housing shown in the revised plan is of an appropriate scale and design and in keeping with the general character of the area. It would add visual interest to the street scape. In general the development has tried to retain the character and feel of the area and as such we would be supportive. It is disappointing that the trees to the road are to be lost but we understand that the tree officer accepts the approach of removing the existing trees and replacing them with a species better suited to being adjacent to housing. However there are two minor points that could be addressed.</p>

	<p>1 The proposed access road to the terrace (units)7-10 could perhaps be straight rather than curved. This would allow sight lines through to the field beyond in particular if this end boundary was hedged rather than the 1.8m high close boarded fence. This would help soften the boundary with the Green belt. Green space created would add to the general character of the area and perhaps be useful for additional planting.</p> <p>2 Ideally hedging should be planted beyond the boundary fence to the field and the access road to the field to soften the boundary and fit better with the surrounding landscape rather than the proposed 1.8m high fence. The hedging should be mixed native species. Opportunities should be taken for additional tree planting where possible.</p>
Hertfordshire Property Services (HCC)	<p>Hertfordshire County Council's Growth & Infrastructure Unit do not have any comments to make in relation to financial contributions required by the Toolkit, as this development is situated within Dacorum's CIL Zone and does not fall within any of the CIL Reg123 exclusions. Notwithstanding this, we reserve the right to seek Community Infrastructure Levy contributions towards the provision of infrastructure as outlined in your R123 List through the appropriate channels.</p>
Crime Prevention Design Advisor	<p>Thank you for sight of planning application 19/02735/MFA, Proposal: Construction of 10 new dwellings with associated access road, parking and landscaping, Land East Of Hardwick Barnes Lane Kings Langley Hertfordshire</p> <p>In relation to crime prevention & Security , I would ask that the development (10 social rent dwellings) is built to the police minimum security standard Secured by Design.</p> <p>Physical Security (SBD)</p> <p>Layout / Boundary No concerns with the layout , however secure boundary gates/fences required to the side and rear of the properties .</p> <p>Front entrance doors Certificated to BS PAS 24:2016</p> <p>Windows: Ground floor windows and those easily accessible certificated to BS PAS 24:2016 or LPS 1175 , including French doors.</p> <p>Security lighting : Individual dwellings.. (Dusk to dawn lighting). Please to see that bollard lighting will not be installed (as detailed in the D&A, 2.4 External lighting , page 10).</p>

	<p>Car Park: Please to see that there is allocated parking in front of the dwellings.</p>
<p>Lead Local Flood Authority (HCC)</p>	<p>Thank you for consulting us on the above application for the construction of 10 new dwellings with associated access road, parking and landscaping at Land In The Corner Of Coniston Road And Barnes Lane, Kings Langley, Herts. The applicant has provided the following information in support of the application:</p> <p>Flood Risk Assessment and SuDS Strategy in relation to proposed residential development at Land at Coniston Road, Kings Langley, WD4 8DE, dated October 2019, Ref: H13732, prepared by Marks Heeley Drainage Strategy & SuDS Appraisal, dated 04/11/2019, Ref: 19-6140, prepared by Syntegra Consulting, Revision A. (It should be noted that this report has been supplied as three separate pdfs.)</p> <p>Contamination Report, dated 3rd October 2019, Ref: 1920453 L02 (00), prepared by RSK.</p> <p>We have reviewed the information submitted by the applicant in support of the planning application. However, the information provided to date does not provide a suitable basis for an assessment to be made of the flood risk arising from the proposed development. Therefore we object to the grant of planning permission. In order for the Lead Local Flood Authority to advise the relevant local planning authority that the site will not increase flood risk to the site and elsewhere and can provide appropriate sustainable drainage techniques the following information is needed:</p> <p>1. Feasible surface water drainage strategy</p> <p>Overcoming our objection</p> <p>The drainage strategy is based on infiltration; however we have a number of concerns surrounding this.</p>

One of the infiltration tests used in the calculations was not BRE Digest 365 compliant.

The applicant has stated how for the purpose of designing the proposed soakaways, they have used design values of 0.149 m/hr for plots 1-6 and the access road, and 0.026 m/hr for plots 7-10 (on the eastern boundary). However, only one test was undertaken to BRE Digest 365 standard. Further, the infiltration tests were not undertaken in the location and depth at which infiltration is proposed.

From a specific review of the trial pits, as detailed within the SuDS Strategy prepared by Marks Heeley and the Contamination Report prepared by RSK: in TP1, made ground was encountered until 1m depth, then clay with flints until the trial pit was terminated at 2m depth. In TP2 made ground encountered until 3.5m; with a further 10cm to find clay with flints formation until trial pit was terminated at 3.6m depth. In TP3 made ground until 3.6m. Only dug down a further 5cm to find clay with flints formation until trial pit was terminated at 3.65m depth. In TP4 made ground encountered to 3.8m, trial pit was terminated at 3.8m depth. In TP5 made ground to 3.4m, only dug down further 5cm to find clay with flints formation until trial pit was terminated at 3.45m depth.

In summary, TP2, TP3, TP4 and TP5 all encountered made ground up to a depth of greater than 3m deep. They are therefore not suitable locations for a 1.3m deep (or indeed a 2m deep) soakaways. No infiltration should occur through made ground, where it has been confirmed in the contamination report that former landfill waste material up to a depth of over 3m and with material to a width of 0.7m is present. Further, asbestos was found on site as well as other waste materials. Further, infiltration has also not been proven in the location of the majority of proposed soakaways. Whilst one trial pit has BRE 365 compliant infiltration tests, infiltration is being suggested throughout the site and not

solely in that location. Infiltration is being suggested in areas where made ground dominates.

From a review of the Groundwater Source Protection Zone mapping, the site is within SPZ 2 outer protection and SPZ 3 total catchment. There is therefore the potential for groundwater to be impacted by contaminants within the former landfill leaching.

Especially considering that from a review of the contamination report, it is stated how

"several coarse gravel sized asbestos containing material fragments (corrugated asbestos boards) were identified in TP1".

We would object in principle to discharge via infiltration unless the applicant can demonstrate that there is no risk of contamination leaching and thereby polluting the groundwater. No infiltration should occur through made ground where it is contaminated.

Further, even if all potential sources of contaminants are removed and the site is remediated; if infiltration is proposed, infiltration tests need to be carried out at the location and depth of the proposed infiltrating features.

Within the hand calculations and MicroDrainage calculations provided infiltration is proposed through both the sides and the base of the soakaway. Currently the base of the soakaways would be in made ground. If the applicant was to redesign the scheme so the base was not into the made ground, they should be aware that, no infiltration should be occurring through the sides of the soakaways, as this would be into the made ground.

In addition, we are unable to see the location of the soakaway trial pit S1 on the plan, Drawing title: Investigation Locations, Drawing No. 1920453-R01(00)D001A, dated 06.09.19, Rev A, prepared by RSK. However, it is acknowledged that the applicant has

provided a description of where these trial pits for soakaway testing were located ("Trial pit S1 was located in the north-eastern corner of the site, whilst trial pit S2 to the south east of the electricity substation"). However, S2 was not used for infiltration testing.

Within the RSK contamination report, it is stated how the purpose of the trial pits were to determine the full vertical and lateral extent of the landfill area and trial pits S1 and S2 were designed to determine infiltration characteristics. However, it is stated how a possible gas pipe was encountered in trial pit S2 at a depth of 1.4mbgl and therefore TP6 was utilised for the infiltration testing instead.

The applicant will also need to provide updated calculations and a supporting contributing area plan. Currently within the hand calculations, it is shown that the roof areas and access road have been included within the contributing area calculated. However, the areas of permeable paving which will also be positively drained have not been included. In addition to other potential areas which will be contributing. These should be shown on a contributing/impermeable area plan for clarity.

We would also highlight how within the calculations, SA1 are 6 individual soakaways, but modelled as 1, SA2 soakaway is in the road, SA3 are 3 individual soakaways with SA4 in the middle house plot. We would suggest that the entire drainage network should be modelled and calculated.

Volume calculations will need to be undertaken again to include all areas which are positively drained (including pervious paved areas); these areas are lined and are draining to the soakaway. If direct infiltration was found to be feasible from the permeable paving sub-base, this should be included as such, however this is currently not the case;

and indeed unlikely to be feasible due to the contaminated / deep made ground.

Further, we would recommend that all permeable paved areas are lined and connected into the wider drainage system, this is because no infiltration should occur through made ground.

If the access road is not proposed for adoption, we would question why it is also not a permeable surface. If it is to be maintained as tarmac, it must have adequate management and treatment. It is acknowledged that the applicant has stated how it will fall so that any runoff drains through the permeable paving. However, filter trenches/strips or swales will need to be incorporated if this is not possible.

As a result of the above comments, we would suggest the applicant needs to re-evaluate the surface water drainage strategy for the site, so that the surface water discharge mechanism proposed is feasible.

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

Informative to the LPA

We ask to be re-consulted with the above addressed. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate surface water drainage assessment has been submitted.

Please note, if the LPA decides to grant planning permission, we wish to be notified for our records.

Local Parish	The Council had NO OBJECTION to this application
Local Parish	The Council OBJECTED to this application because: a) the poplar trees are being felled with, seemingly, little justification b) there is insufficient parking provision, especially to compensate for that being lost on Coniston Road to provide access to the development, exacerbating the already bad situation at school drop-off and pick-up times.

APPENDIX B: NEIGHBOUR RESPONSES

Number of Neighbour Comments

Neighbour Consultations	Contributors	Neutral	Objections	Support
26	21	0	21	0

Neighbour Responses

Address	Comments
1.	<p>I live on Coniston Road and think that his new development would cause even higher level of traffic and lack of parking, especially during school run time. I am already experiencing difficulty parking coming home after work, as I only have 1 or 2 spaces free to park, and they are most of the time not outside my house. This new development would not provide sufficient parking spaces, which means that Coniston Road would have to absorb it. This would just increase the problem of parking space availability.</p> <p>It would also increase traffic through Coniston Road, increasing the danger of crossing the road and reducing safety of children on the road, especially bearing in mind the primary school next to it.</p> <p>Thirdly, the improvement to the S shape bends at the top of Coniston Road are desirable already, as it is already not especially safe to drive through there (especially, at night). I already have to stop letting larger vehicles from the upcoming traffic to drive first, as there is not enough space for two vehicles coming from opposite directions to drive through there at the same time. The new housing with no sufficient parking spaces there would only worsen this issue, and increase the risk of accidents.</p> <p>This development together with new housing in Rectory Farm would put more pressure on both Kings Langley Primary and Secondary Schools that are already experiencing issues with the inadequate vehicular infrastructure.</p>

	<p>Moreover, the quality of air and low noise levels were main reasons for us when purchasing a house in Coniston Road. However, this new development with increased traffic and pressure on parking spaces would contribute towards worsened level of air and increase of noise levels in the area, which is very upsetting for us.</p> <p>Lastly, this development would back immediately onto green belt land, the rural views from the green belt would be blighted by houses which would be too tall.</p> <p>I strongly object the development of this new housing proposal.</p>
2.	<p>Trees There are 4 beautiful poplar trees growing at the top end of Coniston Road, in a row parallel to the road, to the left of the proposed access road. I would be very unhappy for these to be cut down</p>
3.	<p>Parking There is a shortfall in parking provisions for multiple car families. The current proposal allows for less than two cars per household - which is unrealistic. The same happened at red Lion Road, which is now completely congested at rush hour, and cars constantly obstruct the pathways. The same will happen on Coniston if this goes ahead - which is a road that already suffers greatly from lack of parking.</p> <p>Traffic As a resident on Coniston Road, I'm worried that the increase in traffic, especially on school run times. Coniston Road already suffers massively from congestion at school run times, and this will only make matters worse. The proposed site entrance At the top of Coniston Road is already a bottle neck, due to the tight S bend which doesn't allow two cars to pass easily which will be further impacted should this go ahead. If the plans were to go ahead, I would expect the S bend to be redesigned to prevent further congestion issues.</p> <p>alternations to original plans The application is substantially different to the original proposal. The roof heights are higher, and generally they won't be in keeping with the rest of the area.</p> <p>Environment There are 4 poplar trees which were going to be preserved in the original designs, which are now going to be removed and replaced with new trees which I feel is a huge shame and frankly unacceptable. Again, the developers have gone against their word based on the original plans in an attempt to keep local residents sweet,</p> <p>The future of Green Belt Another concern is the possibility of extended the plans to the green belt paddock once this application is granted. The designs lend themselves to further development, which will eat into our already decreasing open spaces.</p>

<p>4.</p>	<p>I live on Coniston Road next to the field. I am very concerned that there may be expansion into this greenbelt, now that the field is in the process of being sold; from this new development of 10 houses.</p> <p>I totally agree with all other comments, especially parking, increased use of our overburdened infrastructure and services.</p> <p>The wildlife seen on this field needs to be protected. it is our responsibility. As do the mature Poplar trees at the top of Coniston, which we were initially assured were protected at the meeting held at the Nap in October this year.</p> <p>I have lived here for 15 years, and understand that this field may have historical significance to our community, and must have a geological survey.</p>
	<p>As a nearby neighbour I wish to register my particular objections to the proposed development above.</p> <p>I strongly suggest that you send some people up to the proposed site every day for a week at school drop off and pick up times (morning and evening) to see for yourselves the utter chaos that is already happening. There are cars coming into the small, narrow, tight bend in the road from all directions, at the same time of day plus scores of children from the ages of 5 -18 walking around - often in groups chatting instead of paying attention to traffic - this is already an accident waiting to happen. Add to that any access for emergency vehicles at these times of the day up/down Common Lane or Coniston Road which is virtually impossible. Adding 10 more houses to this immediate area would only make this whole situation worse. As a nearby resident I find it impossible some days to get out of or back to my house at these times of day.</p> <p>Another car related issue if the number of car parking spaces planned for the number of houses which, given the size of the houses does not seem to be adequate. Therefore I fear overflow parking in the streets around with all the knock on effects that would have. Access to the proposed development by Refuge trucks and other large vehicles is another concern - I wonder how/if such vehicles can actually enter and exit this complex!</p> <p>I am very concerned about the design and height of the proposed buildings which are not complimentary to the existing surrounding houses. I understand that the area currently in consideration is not Greenbelt although I believe a small area is (but it is deemed to be low value Greenbelt) but it looks to me as if access is being planned through to the adjoining field which is Greenbelt (where the horses are) and the fields /farmland beyond that. If the intention is to expand this project with other phased developments they would add to the things I have already mentioned not to mention carving up Greenbelt land which surely would fly in the face of the 'Climate Emergency' declared by Dacorum recently - erosion of natural habitat is under threat here. Also the very nature of the rural village of Kings Langley would be changed with many more houses putting pressure on infrastructure. It is not clear to me what is going to happen to the lovely poplar trees that have</p>

	<p>graced this area for many year giving pleasure to many - again if they are removed this cannot be in line with preserving our green credentials.</p> <p>I see in local press regularly that we must build more houses but I feel that our village has already taken a massive hit with the enormous developments at Nash Mills, The Ovaltine and Apsley. Our roads, schools and doctors are full - the beautiful historic village of Kings Langley can't take much more!</p>
5.	<p>The traffic on Coniston Road is at a standstill from the top to the bottom every pickup and dropoff. Common and Love Lane are also highly congested due to primary and secondary school proximity. As this makes it the time most likely for potential child accidents it it's clear that emergency services would be totally unable to navigate along any of these routes.</p> <p>The destruction of 4 or 5 magnificent poplar trees cannot be justified on the grounds of potential 'risk of damage during construction'. Dacorum have recently committed to preserving existing trees and planting 1,000 each year, surely this proposal conflicts directly with the wishes of The Council. Further, the recent Council commitment to environmental awareness and protection should also have a great impact on this development.</p> <p>Parking is totally inadequate for this number of dwellings, 4 visitor bays will be filled immediately at pickup and dropoff times, making it essential additional 'protected' sources are provided.</p> <p>Roof heights at the top of the hill will be disproportionately high compared to existing Coniston Road houses. They will act as a black silhouette when approaching the top of the Lane. This will have a very negative effect on consultation amenity in green wooded environment.</p> <p>The increase in pollution of more cars on three direct area and sure to the secondary school numbers will have a great impact on air quality and particularly younger children's health.</p> <p>I believe this whole development needs to be considered in the light of the potential secondary development via the extension into the adjacent green belt paddock. This acts directly against Council and Government Green Belt protection policy. I am positive that this does not fall into the EXCEPTIONAL circumstances criteria.</p> <p>As the population of the secondary school increases in line with plans already submitted, all traffic issues will be significantly negatively impacted.</p> <p>We have lived in Barnes Lane since 2005 and were completely unaware of any potential development on this site. With lack of previously notification, we are dismayed with the shortness of time left to comment properly, as well as the changes and revisions that have occurred in the past few weeks.</p> <p>Could you please advise of the previous Local Plan details of when this area was previously designated as development land.</p>
6.	<p>Planning Application: 19/02735/MFA - Construction of 10 new dwellings with associated access road, parking and landscaping Land East of Hardwick Barnes Lane Kings Langley Hertfordshire.</p>

My name is Gary Ansell and I am Chair of the KINGS LANGLEY & DISTRICT RESIDENTS ASSOCIATION (KL&DRA).

I write to object to this application, on behalf of the Residents Association, for the following reasons:

1. The Development is too high

The houses in the proposed development are too high and too prominent in what is an elevated position at the top of Coniston Road. The design is not in keeping with existing local house design which comprises lower level hipped roofs.

2. It is out of keeping with character of area

As mentioned in 1. Above, the design and layout of the proposed development is out of keeping with the character of the area

3. There is inadequate parking provision

17 spaces (including 4 visitor spaces) is not enough for 10 houses. This will lead to parking on verges and on other parts of the local road network which already suffers significant congestion at school time due to the proximity of the junior and senior schools. This will make it more dangerous for school children and other pedestrians as well as car drivers trying to negotiate parked vehicles on Barnes Lane and Coniston Road which are by nature narrow.

4. The increase in traffic is unacceptable

As mentioned at 2. above, the area is already highly congested at school run time and 10 additional houses in this area will only make matters worse.

5. There are highways issues

The two roads adjacent to the proposed development, Barnes Lane and Coniston Road are too narrow to accommodate additional traffic and parking needs that the proposal will generate. This will significantly increase the risk of accidents and potential injury to persons in the immediate area, particularly at school run time.

6. There is an increased danger of flooding

It would appear that the proposed provision for soakaways is inadequate which could lead to excess surface water and flooding.

7. There are contamination issues that have not properly been addressed

Reports indicate that the land is contaminated, however, detail as to how this problem will be dealt with does not appear to be shown.

8. There is unnecessary removal of mature trees

Existing healthy poplar trees which characterise this area are being removed for no good reason despite the initial consultation stating that they would be retained. Climate change initiatives require that mature trees are retained, not cut down.

9. Foul water drainage issues

	<p>Foul water drainage has not been sufficiently dealt with and it is understood that the existing sewer network is at capacity and in a poor state of repair.</p> <p>10. Potential development of the Green Belt It is clear from the proposed road layout on the development that the intention is to make provision for future access to the 'horse field' which is adjacent to the site. This is Green Belt land and the KL&DRA strongly object to this development being used as the catalyst to remove another area of Green Belt around our village - land which helps define its character and rural setting. Should this be the intention, this alone makes this development unsustainable as the potential larger local development will significantly increase the infrastructure and traffic issues already mentioned.</p> <p>I do hope that the comments set out above will be duly considered by Dacorum Borough Council planning when this application is considered.</p>
7.	<p>Concerned re increase in traffic travelling up and down Coniston road which is already heavy. There are not enough parking spaces allocated and parking is already an issue for residents and the nearby school. Air quality assessment should be obtained because of the school in particular. Barnes Lane is a semi rural location which will be irreparably changed and not for the better.</p>
8.	<p>The proposed development appears to have several issues of which the most important is the obvious intention to significantly expand the development. The plans show a road between plot 6 and 7 from which it can be inferred that the intention is to take this road through to the next field and expand the development significantly. As I understand it, this would have impact on the adjacent green belt land. It would also greatly increase the burden on local resources and cause significant traffic issues and so on this reason alone should not be approved as it currently presented. If the intention is to expand the development then this should be included in the plans before approval. If there is no intention then this road should be removed from the plans and the plans re-structured to expand the plots for each house which will provide the missing car parking spaces (see note below).</p> <p>The vehicular access to the development is in close proximity to the Primary school and Senior schools, which will considerably increase the pollution and danger to children at the crucial 'school run' time. If this development goes ahead, the access and road layout should be reviewed as it is already dangerous.</p> <p>On a separate note, the plans indicate that there are 13 car parking spaces for the 10 houses. This is insufficient as there needs to be at least 2 parking spaces per house otherwise more cars will be parked dangerously on Coniston Road. The plans should be re-designed to include more car parking spaces. The obvious solution is to remove one house from the plans and turn it into a car park.</p> <p>It is unclear from the plans what the intended market is. The requirement in Kings Langley is for affordable housing and for small</p>

	scale housing for older residents - which would free up larger properties for new residents.
9.	<p>I live on Coniston Road and my rear windows look out over the piece of land in question. I would be saddened to lose the view of the countryside and as my 10 year old said, 'why would they want to ruin that?'</p> <p>My children attend the primary and at certain times of the day it is already impossible to get home to collect them or leave in any hurry. The congestion, parking issues and dangerous driving is a real concern and of constant comment in the local area. The fumes that are already pumped out as people wait in their cars at drop off and pick up is a problem without adding further to this. Poor planning for parking for new developments has already had an impact on Red Lion Lane which has now become dangerous to navigate. The allocated parking for this development is inadequate.</p> <p>This development sits on the border of green belt and seems to be offering an 'in' for further development which would be at odds with the local plan. The erosion of green belt land is something I would definitely be expecting the local government to be opposed to.</p> <p>Services and infrastructure in the area are already at breaking point and I have concerns for the impact on the health and safety of the children in both schools should they ever require the emergency services.</p> <p>The decision to remove the poplar trees is also at odds with the local government initiative to plant more locally. This would further damage air quality. A further impact would be on the local wildlife, including owls, hedgehogs and deer.</p> <p>The prior use of the site as landfill has shown that pile foundations would be required due to the depth of the waste. Surely this will hugely escalate the build cost to the council considering these are to be low cost council homes?</p> <p>There would be a reduction in light at the end of the day in the summer as the sun sets behind the proposed site. This would affect many of the rows of houses during the summer evenings and would cause overshadowing on many of our homes. Has the right to light been considered in this development? We would lose the sunsets we currently enjoy.</p> <p>It seems the attitude of the local planning and development is to squeeze as much in as possible without due regard to future sustainability or environmental consideration.</p>
10.	<p>Trees</p> <p>I object in the strongest possible terms to the removal of the four mature poplar trees, which are currently growing at the top end of Coniston Road, in a row parallel to the road, to the left of the proposed access road. These beautiful trees are a feature of the road and, due to their height, are visible from considerable distances. For example, our house is set 50 metres back from the road and we can see the trees from our garden.</p> <p>At the meeting held in Kings Langley by the developers, local residents were assured that these poplar trees would not be removed. Kyle Smart's original plans confirm this. However, it now appears, from the</p>

	<p>amended plans, that the developers intend to go back on their promises. The amended plans show that these trees will be removed and replaced by new trees. This is completely unacceptable. There is no good reason for these mature trees to be removed. Indeed, in their original Design and Access Statement, 2.3 Approach and Principles, the developers state: "The fact that the site borders a Green Belt area has informed the overall design. The majority of the existing trees were kept to screen the new development as well as the fact that they were important to the residents". These trees are very important to residents, and even to residents of Kings Langley who do not live adjacent to the site.</p> <p>Proposed Parking Allocation The number of proposed new plots on the site is inadequate. It is already difficult for residents of the top end of Coniston Road to find parking spaces, particularly during school drop off and pickup times, and other school activities . This will be exacerbated by the loss of parking spaces due to the access road. Because there is inadequate parking on site, additional cars will end up being parked on Coniston road, making the parking problem even more acute. This has happened, for example, in Red Lion Lane in Apsley, which now has a huge increase in street parking due to inadequate parking provision in a nearby development.</p> <p>Traffic Volume and Congestion The site is very close to both Kings Langley Primary School and Kings Langley Secondary School. During drop off and pick up times, it is already virtually impossible to navigate the area. It is common for cars to be double parked, resulting in gridlock. The resulting congestion can extend the full length of both Coniston Road, Common Lane and up into Love Lane. Additional traffic from the site and the presence of the access road would make this even worse.</p> <p>Design of new houses The design of the new houses is not in keeping with those of the houses at the upper end of Coniston Road. The proposed roof heights are taller than surrounding roofs and could be decreased by using a hipped roof solution. Tall houses blight the Green Belt views unnecessarily and look out of place.</p> <p>Future development It appear from the plans that the developers have left open the possibility of further development onto adjacent Green Belt land. This would be entirely unacceptable to residents on many grounds and would be resisted.</p>
11.	<p>This is a ridiculous proposal! We have south facing gardens which means a lot of our light will be taken away, not to mention being over looked! How can you take the beautiful trees away?? and the horses that have been there many years!</p> <p>The traffic up this road is an absolute nightmare during school hours with residents not being able to park even near to their own houses during this time, its not just the primary school traffic but the secondary</p>

	<p>school too! We have public transport coming up and down the road also, on a Tuesday and Thursday i.e buses.</p> <p>This is just a preposterous idea to have more properties up this road causing more chaos than there is already!</p> <p>Please feel free to drive up and down Coniston Road at school times, you might then think about the existing residents and what we have to deal with on a daily basis!!</p> <p>Merry Christmas!!</p>
12.	<p>I live at the top of Coniston Road, right where these houses are supposed to be going.</p> <p>During school drop offs and pick ups the road is horrendous! it is not just the Primary school but also the secondary school! nowhere to park, trying to get up the road is a nightmare, these houses will add to the mayhem! it really isn't fair on the residents that already live up there! you need to come up the road at school times just to see how bad this really is!!</p> <p>At the moment it is lovely to see greenery and wildlife, this village is getting too built up, I will loose a lot of light as my garden is south facing, not to mention the loss of privacy being overlooked! It is lovely for my children to play in our garden without being looked at by people!</p> <p>The construction of the proposed properties will not be in look with the original houses, they will be an eyesore!!</p> <p>This is just a complete ridiculous planning application that should seriously re-thought!</p> <p>RIDICULOUS!</p>
13.	<p>Re: Proposed development Coniston Road - Planning Ref: 19 / 02735 / MFA</p> <p>I wish to register my opposition to the above development on the following various grounds.</p> <p>Increased Traffic</p> <p>With the nursery, infant and junior schools adjacent to Coniston Road, the area already suffers greatly from congestion in the mornings and afternoons. Cars double park and park across the verges, making it very dangerous for children and pedestrians to cross the road. During these times, residents also find it almost impossible to leave or return to their properties. Additional housing will only exacerbate this problem.</p> <p>Parking Allocation</p> <p>13 bays for 10 houses is insufficient. With increased car ownership, there should be a minimum of 20 bays available for residents. Red Lion Lane is a prime example of the impact of under provision of parking spaces. Due to the lack of parking, visitor bays will be permanently used by residents, meaning visitors will be forced to park on Coniston Road, which will have lost parking spaces due to the creation of the new access road to the development.</p> <p>Overlooking</p>

	<p>The proposed site backs directly onto my property meaning both a loss of privacy and a view blighted by the new houses.</p> <p>Back door Erosion of Green Belt</p> <p>I am concerned that the proposed plan is just the start of a much larger project. The space left between plots 6 and 7 is a clear indication that the council will next attempt to de-commission the green belt area immediately behind this development to build a much larger number of houses.</p> <p>The proposed development will also remove much of the field and hedgerows which are currently home to, amongst others, woodpeckers, voles and deer.</p> <p>Summary</p> <p>I strongly object to this proposed development. My local council should be supporting the prevention of erosion of the green belt, preventing increased danger to local school children and reducing traffic congestion by rejecting this proposal.</p>
14.	<p>I quite often look out at the horses of a morning, the beautiful trees and wildlife, i will not be able to do that if this goes ahead!</p> <p>The traffic is awful at the best of times with the schools.</p> <p>We seem to be loosing all the greenery we have in the village, seems to be every little bit is being built on, surely this is no good for the environment!! The properties will not be in keeping with the rest.</p> <p>How will schools and doctors surgeries cope if more people reside in the village.</p> <p>This seriously needs to be thought about before the council become to regret their decision if they go ahead with this stupid idea!</p>
15.	<p>On the revised plans more trees (I believe 4) have been removed outside of area of build. I see no reason why these trees should be removed, we should be saving trees NOT removing them, for no good reason. In addition to my comments on the original plans, I would like to strongly opposed the unnecessary removal of these trees.</p> <p>Parking Allocation</p> <p>18 bays for 10 x 4-5 bedroom houses is NOT enough. The visitor bays will be permanently used by residents - forcing visitors to park on Coniston road, which will lose parking spaces due to the creation of the new access road to the development. We do not want the same situation as Red Lion lane, where residents permanently block the road/pavement with overflow parking. You should be looking to make developers exceed the required parking allocations as the rules are out dated. If each house is allocated 2 parking spaces this will potentially prevent any negative impact in the immediate area. It should exceed regulations in order to appease concerns of local residents.</p> <p>Traffic/Highways/Increased Traffic</p> <p>This area of Coniston Road is already hugely congested due the drop off and pick up from the school. Additional housing will only exacerbate</p>

	<p>this problem. Measures should be put in place to stop illegal parking of vehicles at all times of the day - specifically a low wooden barrier to prevent vehicles parking at the top end of Coniston Road and to prevent cars parking illegally in the new access road to the houses and close to the new t-junction the access road will create. The proposed increase in size to the senior school will also create increased traffic using Coniston Road, so this new development will be only add to this.</p> <p>Out of Keeping with Character of the Area/Over development</p> <p>The current council properties are low lying smaller houses with hipped roofs. The proposed height of the roofs is considerably higher thereby creating visual intrusion for all the surrounding houses. The plans should be adjusted to a hipped solution maintaining the same level as the council houses at the top of Coniston Road. Coniston Road is a 'rat-run' which already has a high density of houses - so this new development constitutes over-development.</p> <p>Overlooking</p> <p>As this proposed site backs directly onto green belt land which includes a public footpath, the view from this Green Belt land will now be blighted by the new houses.</p> <p>Other - Back door Erosion of Green Belt - I am concerned that the plan which has been proposed is the start of a much larger project whereby the council will attempt to de-commission the green belt area immediately behind this development to build a much larger number of houses. This is evident by the space left between plots 6 and 7. I expect my local council to be doing everything possible to stop the erosion of the green belt in the area and along with our local residents association we will be keeping a close eye on this to make sure the green belt is protected at all costs.</p>
16.	<ol style="list-style-type: none"> 1. The site borders onto the green belt and the new dwellings, which have a very high pitched roof and are to be constructed on elevated ground, will be quite prominent. The design of the houses are detrimental to the openness of the Greenbelt due to their prominence in design (i.e. too tall appearing incongruous within the existing street scene and therefore harmful to the Greenbelt) which is contrary to part 145 (g) of the NPPF. Suggest lowering the roof which currently appears 'top heavy' and too high given the height of other nearby properties. Introduce a hipped roof to help 'soften' the appearance of the design. 2. The dwellings will obstruct view onto the greenbelt land from my house. 3. Only 17 parking spaces being provided. This will likely result in off street parking which will add to the lack of parking in the surrounding area, particularly during school time - Kings Langley primary school is located next door and Secondary School is round the corner, and the road junction between Barnes Lane and Coniston is heavily used and becomes extremely congested and unsafe, with parents parking on pavements and ruining grass verges, and also reducing safe pedestrian access and visibility. New development will add to the problem - particular as new entrance will take up existing parking spaces.

	<p>4. To the assist with the above parking issue, we would like to see the making improves to the surrounding highways. i.e. better road alignments, road widening to improve traffic flow , barriers/timber knee rails to prevent parking, TRO and double yellow lines.</p> <p>5. Original scheme during the public consultation 30th September showed more of the existing trees front the site being retained. The latest scheme shows more trees being removed which we cannot see why they can be retained.</p> <p>6. The access road into the site appears to be designed to access a future larger plot to the north which I understand is still in greenbelt. Very concerned that if this development is approved then this will pave the way for the next phase 2 to be developed.</p> <p>7. There is no details to how the new social housing will ensure properties will be allocated to local residents linked to Kings Langley.</p> <p>8. There is no proposals to remediate the site</p> <p>9. There is no details of how foul water will be dealt with. Existing Thames Water sewer network is at capacity and is in a poor state of repair.</p>
17.	<p>Dear Sirs, Re: Proposed development Coniston Road - Planning Ref: 19 / 02735 / MFA</p> <p>I write to record my opposition to this development on the following various grounds.</p> <p>Local Plan</p> <p>This site was put into the Local Plan without any direct communication with any of the affected adjacent neighbours / residents. I have exchanged many emails with Francis Whittaker (Strategic Planning & Regeneration) who has not been able to provide any specific times and dates as to where the site was advertised to accord with Dacorum's own protocols. As far as I can ascertain Dacorum BC have not complied with their own protocols to include the site within their own Local Plan. If Dacorum have complied, this specific information should be made available under the "Freedom of Information Act".</p> <p>Development Specific Comments to Information on the DBC Planning Portal</p> <p>Arboriculture - It is very disappointing to note that the latest revision of the Arbo Impact Statement (21st Nov 2019) now proposes to remove the large Poplar trees at the top of Coniston Road. It has not been made clear exactly why BHA Trees have made this revision? These trees are very characteristic of this area and should be retained at all cost.</p> <p>I would also request the tree / hedge line in Barnes Lane is reinforced for the width of the development to provide additional screening / plug the gaps.</p> <p>Contamination and Surface Water Drainage - RSK Reports 1920453 LO1 & LO2 are available on the portal but unfortunately the</p>

Geotechnical Report (1920453 RO1) has not been uploaded for some reason?

The issue of remediation to the contamination found does not appear to have been addressed (within the above reports) specifically in terms of siting soakaways within the Waste Pit Boundary shown on Dwg No 1920453 3A. From the logs available within the Waste Pit Boundary permeable chalk was not encountered at reasonable depth (to employ soakaways) within TP's 2,3,4,5 & WS3. I would therefore submit that the soakaways proposed on Marks Heeley Dwg No H13732-D1 within the rear gardens of plots 1 to 6 are not viable and could promote migration of contamination if constructed without a proper remediation strategy being put into place. The Environment Agency and Building Control should be made aware of this problem and the shortfall in information within the application.

Design & Access - Kyle Smart - Section 4.5 states that a Remediation Strategy (mentioned above) will be provided at a later date. Given the potential problem of surface water drainage allied to plot 1 to 6, I would respectfully request this matter is addressed urgently pre planning.

Transport Statement - Mayer Brown 10th October 2019

Section 3.6 advises of proposed visibility splays onto Coniston Road (2.4 x 25m). There is currently a short fall in parking in Coniston Road generally which is totally exacerbated during school drop off and pick up times. I have provided 3 short extracts of video footage on DVD which serve to highlight this problem - sometimes it is impossible to traverse the footway network due to cars parked perpendicular to the road right across the footway. The formation of the new site entrance will also exacerbate this problem and yellow lining / TRO's / knee rail fences will be required in order to keep the visibility splay areas clear of parked cars.

Section 3.10 addresses parking - in my opinion the provision of 13 parking bays and 4 visitor bays for 10 houses is wholly inadequate. The units proposed are all two and three bedroom properties and realistically there will be 2 or 3 vehicles in each property - clearly this represents gross over development in terms of parking. I would point out that it is possible to provide at least two on plot parking bays to each unit (at the expense of landscaping) which I am sure would be preferred by all and sundry. The site is directly adjacent to a school and the provision of proper parking on and off site must be highly prioritised not least of all for Health and Safety reasons - this area is an accident waiting to happen.

I would also respectfully remind the planning department of the problems they have caused in recent times in Red Lion Lane, Apsley with the redevelopment of the John Dickinson mill site - overspill parking is permanently present for the whole length of this road. The road width has been dangerously restricted together with the footpath on one side of the road. Please learn from this and do not repeat this problem in Coniston Road.

This document does not analyse or address the wider problems already present within the adjacent road networks (Coniston Road / Barnes Lane / Common Lane / Love Lane / Highfield / Barnsway / Tylers Close Belham Road / Havelock Road / Whitlars Drive / Chipperfield Road / Vicarage Lane). During peak pick up / drop off times for the adjacent schools the whole area is grid locked to which this new development will further contribute. Kings Langley School has also recently applied for a larger intake of pupils (despite this premise being repeatedly refuted) which will also exacerbate traffic problems even further.

Dacorum Borough Council should seriously consider the following highway improvements:

- Widen both S bend on Coniston Road - they are currently too narrow to promote the passing of two cars let alone any larger vehicles
- Install a small / mini roundabout at the junction with Coniston Road & Hempstead Road this is particularly important given the pending development of Wayside Farm)
- Install a small / mini roundabout at the junction with Love Lane / Vicarage Lane / Chipperfield Road
- Prevent parking around the proposed new site access and areas around both schools generally with yellow lining and TRO's to restrict parking - employment of a village traffic warden would be self funding and provide DBC with a further source of revenue.
- Prevent parking on existing grass verges with the installation of knee rail fences which are currently employed around the green area at Barnes Lane / Common Lane junction
- Undertake an air quality assessment of the areas around both schools during peak times - pollution levels should be proven to be safe before any further development is sanctioned in this area

It is interesting to note that the submission documentation does not include any Road Safety Audits by third party traffic consultants either on or off site. I have never worked on a development where this has not been required - can the planning department please explain this omission.

FRA / SUDs - Marks Heely Ref H13732 - This document ignores the known presence of contamination for which RSK have not generated a remediation strategy (as mentioned above). On this basis the drainage of surface water from plots 1 to 6 is not viable not least of all from a contamination perspective. The following also require further review / comment pre planning:

- It should also be noted that percolation testing has only been undertaken at two locations namely S1 & TP6/S2. Ordinarily percolation testing to BRE 365 should be undertaken at the location of every soakaway proposed (particularly when the testing has not been undertaken properly and results are marginal and towards the slower end of the spectrum)
- At S1 the testing has not been undertaken in accord with BRE 365 in that 3 fills of the pit have not been undertaken - the one result generated provides a value of 7.27×10^{-6} m/s, subsequent fills will normally be substantially slower (as the sub strate becomes water logged) and probably render soakaways in this area non viable as the requisite drain down time will not be achievable (see Section 3.4).

- At TP6/S2 three values have been recorded and Marks Heely have utilised the slowest rate of percolation ($4.14 \times 10^{-5} \text{m/s}$) as required under BRE 365.

- There are no designs for private drives constructed as permeable pavements within the document, and indeed, over the majority of the site these will again not be viable as the permeable chalk sub strata is too deep - there is insufficient information currently available. On this basis the current soakaway designs are put further into question as I do not think they do not include all impermeable areas proposed.

- There is no scale on Marks Heely Dwg No H13732-D1 - I am therefore unable to check the impermeable areas cited within their calculations - please ensure the drawing is revised to include the correct scale. Additionally a plan clearly depicting all proposed impermeable catchment areas should be generated to ensure the areas correlate with the calculations.

- The document does not mention foul water drainage and there are no detailed level proposals present on the planning portal. From the Existing Site Plan by Kyle Smart Ref 18058su1.02 I suspect it will not be possible to drain all plots by gravity (particularly plot 7 & 8) and on this basis there is no space available to site a foul water pump station. Please add existing and proposed site levels together with the proposed foul network to Dwg No H13732-D1 for further review.

Herts County Council as Local Lead Flood Authority are unlikely to approve the current proposals and will hopefully agree with my thoughts in this regard - please ensure my comments are sent to them as a consultee to the planning and that this design is finalised and agreed pre planning. Without further testing being undertaken I suspect the design is fundamentally flawed and inadequate in any event.

From a personal perspective I know that the chalk within my own property is towards the silty end of the chalk / clay spectrum and has very low permeability - the soakaway in my rear garden in particular always has standing water within it even during summer months. I do however acknowledge that geology can change markedly within a few metres and hence the need to undertake percolation testing at the site of every soakaway proposed.

Site Plan & General Proposals - As previously mentioned the current proposals do not adequately cater adequately for parking on this site - as such the site is grossly overdeveloped and intrusive visually to all existing adjacent residents. The roof designs proposed are not in keeping with those existing and adjacent to the site. Single storey units with flatter pitch roofs would be more appropriate and also solve the on site parking allocation problem (fewer bedrooms would require fewer car parking spaces). In particular I would like to see Kyle Stewart Dwg No 18058wd2.02 Rev B amended such that proposed levels are appended and the lower site section extended to show the visual impact onto my own property "Merlins".

Additionally there appears to be clear intent to extend the road between plots 6 & 7 down into the adjacent green belt land - why else is the boundary of plot 6 shown at an angle on Kyle Stewart Dwg No 18058wd2.01 Rev I? This premise will be resisted in the strongest terms by all and sundry in the area. I am also aware that RSK have

	<p>already undertaken detailed site investigation over the whole paddock area but the documents issued to date only address the current site area proposals - perhaps this is why the Geotechnical Report Ref 1920453 RO1 has not been put onto the planning portal?</p> <p>Conclusion</p> <p>The foregoing text provides a brief review of the information currently available on the planning portal and is neither exhaustive or conclusive. That said, and in my humble opinion, the development proposals are unacceptable for various reasons summated as follows:</p> <ul style="list-style-type: none"> - This site has been put into the Local Plan with inadequate advertisement to accord with Dacorum's own protocols or any direct consultation with directly affected existing properties - Existing mature healthy poplar trees characteristic of this area are now being removed from the site frontage - The site layout proposal clearly represents over development and has a totally inadequate provision of on site parking - off site parking is also wholly inadequate and these problems have also not been addressed for the area surrounding this site - Vehicular pollution in the vicinity of the site has not been addressed - this is particularly relevant for the peak drop off and pick up times for the adjacent schools - Remediation of the contamination known to exist on this site has not been addressed - this is particularly important as this will compromise the current surface water drainage proposals - The surface water drainage proposals by Marks Heeley are incomplete based upon an inadequate level of testing - some of the calculations do not work in their current form - Foul water drainage has not been addressed (or the potential requirement for a foul pump station within the current site layout) - The Transport Statement does not address the global traffic problems currently prevailing in the area of this proposed development. Further more there are no proposals made to improve the current road networks and their capacity to enable additional development - this is of paramount importance given the pending development of Wayside Farm and additional pending intake to Kings Langley School. No Road Safety Audits have been generated either on or off site - It is suspected the current layout has been designed to promote future access to the adjacent Green Belt land which is highly undesirable and will be resisted by all local residents <p>Yours sincerely,</p> <p>Don Bennett - D.M.S., I.Eng., A.M.I.C.E., M.C.I.H.T.</p>
18.	<p>I would like to register my opposition to the proposed scheme on the following grounds.</p> <p>Increase of Traffic/Loss of Parking/Traffic or Highways</p>

	<p>The congestion and parking problems all along Coniston Road and where it meets Barnes Lane at times of school drop-off and pick-up pose a dangerous and a chaotic hazard to all concerned. The footpaths and grass verges are blocked by parked cars, presenting unnavigable obstacles for pedestrians and denying access to those with mobility issues. The volume of traffic trying to pass through the bottle neck at the junction of Coniston Road and Barnes Lane, and the general congestion all around this area, severely restricts local residents' access, either on foot or by car, at those times. There are two schools, primary and secondary, with young children and teenagers trying to find a way to school and back home safely through the jostling traffic and parked cars. This area is already at gridlock and already unsafe. The addition of this development, adding to the vehicle load and further limiting parking along the top of Coniston Road, presents a threat to the health and safety of residents, school children, pedestrians and all road users.</p> <p>Inadequate Parking Provision</p> <p>The parking allocation for the proposed houses is insufficient and will result in more cars fighting for already limited space, as outlined above, creating more of a threat to safety.</p> <p>Out of Keeping with Character of the Area</p> <p>The proposed houses are out of keeping with other nearby dwellings, which are low lying with hipped roofs.</p> <p>Over Development/Other</p> <p>I am extremely concerned that this development is the precursor to an erosion of the adjacent Green Belt land. There seems to be provision made in the plans to extend the road between plots 6 and 7, which looks very much like encroachment on Green Belt land by the back door. I and others will vigorously oppose any such plans.</p> <p>Arboriculture</p> <p>Regarding the proposal to remove the poplar trees at the top of Coniston Road, these tall trees are visible from far around and a cherished landmark of natural beauty for local residents. On what grounds can their removal be justified?</p>
19.	<p>Site Entrance Location/ Traffic/ Highways:</p> <p>The entrance to the site of the proposed development poses a safety risk to both Traffic and Pedestrians. The location is at the top of Coniston Road where there is a tight S bend where there is already traffic chaos, particularly at school pick and drop times. The location is within 100 yards of the Primary school and ¼ mile from the Senior School. Both schools result in an extremely large amount of traffic & congestion currently. This chaos will only increase with the proposals and pose a significant danger & safety risk to School children who walk through this route & negotiate the congested traffic.</p>

Parking Allocation

There is insufficient parking for 10 houses and their residents and their visitors, this will spill out into the already congested Coniston Road. The current vehicle movements already cause road blocking, parking on pavements and verges at busy times leading to more safety concerns.

Flooding:

The proposed land adjoins Barnes Lane which regularly floods & the land has poor drainage. I am concerned that the development will only make this flooding worse

Out of Keeping with Character of the Area/Over development:

The proposed development will remove much of the field which is currently home to wildlife, deer and will result in the lost of many habitats such as the hedgerows

The current adjoining council properties are already at a high density - so this new development constitutes over-development and changes the character of the area.

Overlooking/ Environmental Impact:

The proposed site backs directly onto green belt land which includes a public footpath, the view from this Green Belt land will be negatively impacted by the new houses.

The proposed plans have a space between plots 6 & 7 which is clearly deliberate to allow for possible future development of a much larger project & cause erosion of the green belt.

I strongly object to this proposed development & would hope the local council will support the prevention of erosion of the green belt, prevent increased danger to local school children & reduce traffic congestion by objecting to this proposal.

Site Entrance Location/ Traffic/ Highways:

The entrance to the site of the proposed development poses a safety risk to both Traffic and Pedestrians. The location is at the top of Coniston Road where there is a tight S bend where there is already traffic chaos, particularly at school pick and drop times. The location is within 100 yards of the Primary school and ¼ mile from the Senior School. Both schools result in an extremely large amount of traffic & congestion currently. This chaos will only increase with the proposals and pose a significant danger & safety risk to School children who walk through this route & negotiate the congested traffic.

Parking Allocation

There is insufficient parking for 10 houses and their residents and their visitors, this will spill out into the already congested Coniston Road. The current vehicle movements already cause road blocking, parking on pavements and verges at busy times leading to more safety concerns.

	<p>Flooding:</p> <p>The proposed land adjoins Barnes Lane which regularly floods & the land has poor drainage. I am concerned that the development will only make this flooding worse</p> <p>Out of Keeping with Character of the Area/Over development:</p> <p>The proposed development will remove much of the field which is currently home to wildlife, deer and will result in the lost of many habitats such as the hedgerows The current adjoining council properties are already at a high density - so this new development constitutes over-development and changes the character of the area.</p> <p>Overlooking/ Environmental Impact:</p> <p>The proposed site backs directly onto green belt land which includes a public footpath, the view from this Green Belt land will be negatively impacted by the new houses. The proposed plans have a space between plots 6 & & which is clearly deliberate to allow for possible future development of a much larger project & cause erosion of the green belt.</p> <p>I strongly object to this proposed development & would hope the local council will support the prevention of erosion of the green belt, prevent increased danger to local school children & reduce traffic congestion by objecting to this proposal.</p>
20.	<p>Dear Mr Lecart,</p> <p>We are writing today to object to the above mentioned development at the top of Coniston Road/corner of Barnes Lane in Kings Langley. We are directly affected, as we live on Coniston Road.</p> <p>The points we want to object on are:</p> <p>1) The increase in traffic on an already very busy road, especially either end of the school day. Scenes of chaos, beeping of car horns and angry set-tos are already a regular occurrence. People often to drive over the verges, right next to where parents and children are walking. We know of someone personally who no longer walks because he felt he and his children are not safe on the pavement.</p> <p>2) The increased traffic will bring increased levels of air pollution, which is a health hazard for the children walking past and the residents. Already the fumes from idling cars waiting to get out of Coniston Road are oppressive.</p> <p>3) The increase in parked cars fills residents with dread and reduces the quality of life that is one of the attractions of living in a village setting. More and more development will alter the character of the village significantly.</p>

4) The proposed development backs directly onto the Green Belt. Apart from the loss of this part of the field to wildlife, there is a very real concern that the development will turn out to be Phase 1 of a larger development - we refer you to the layout of the road next to Plot 6 on the plans of the proposed development. It is easy to see how this could simply be extended into what is currently Green Belt land.

We hope you will take our comments into account and not allow this development to go ahead.

Kind regards,
Erdmute and Alexander Brownlee