

**ITEM NUMBER: 5a**

<b>20/01355/MFA</b>	<b>Construction of a single storey chapel crematorium with associated parking, landscaping and infrastructure</b>	
<b>Site Address:</b>	<b>Land south of Bedmond Road, Hemel Hempstead, Hertfordshire</b>	
<b>Applicant/Agent:</b>	<b>West Herts Crematorium Joint Committee/Haverstock</b>	
<b>Case Officer:</b>	<b>Robert Freeman</b>	
<b>Parish/Ward:</b>	<b>Nash Mills Parish Council</b>	<b>Nash Mills</b>
<b>Referral to Committee:</b>	<b>The application has been referred to the Development Management Committee because the Borough Council is the landowner.</b>	

**1. RECOMMENDATION**

- 1.1 That planning permission be **DELEGATED** with a view to **APPROVAL** subject to the completion of a legal agreement under Section 106 of the Town and Country Planning Act 1990 (As amended)
- 1.2 That the proposals be **REFERRED** to the **MINISTRY OF HOUSING, COMMUNITIES AND LOCAL GOVERNMENT** as a Departure to the Development Plan in accordance with Town and Country Planning (Consultation) (England) Direction 2009.

**2. SUMMARY**

- 2.1 The construction of the crematorium building and chapel would constitute inappropriate development within the Green Belt in view of its scale and as such would be contrary to the national planning policy framework and Policy CS5 of the Core Strategy.
- 2.2 The visual harm and harm to the open character and appearance of the Green Belt in this locality is however considered to be quite limited and there are very special circumstances which would outweigh the harm caused by the proposals including the economic and social benefits arising from the proposals.
- 2.3 The proposals would provide clear economic benefits in the form of new jobs and increased spending within the Borough, but primarily it would provide facilities for an essential societal need for burial space in accordance with Policies CS23 and CS35 of the Core Strategy. This is a significant and conclusive factor in the decision to grant planning permission in this case.

**3. SITE DESCRIPTION**

- 3.1 The application site comprises 6.3 hectares of land located off Bedmond Road at the south eastern edge of Hemel Hempstead. Located between the crossroads with Bunkers Lane and Blackwater Lane and the junction of the Bunkers Park access road with Bedmond Road the site comprises a former agricultural field which has recently be set out for use as a cemetery.
- 3.2 The proposed crematorium site would be located immediately adjacent to this cemetery use and would utilise the existing access point off Bedmond Road. This access track to the

car park to Bunkers Park has been widened and tarmacked to the entrance of the cemetery and gates have been installed at the entrance thereto

- 3.3 The site now includes an access road running parallel to Bedmond Road together with a number of surfaced footpaths and a car park within which there are 80 parking spaces. A separate access and 'L' shaped building has been constructed adjacent to the eastern boundary with Bedmond Road and incorporating an administration and service area for the cemetery.
- 3.4 Land north of the cemetery and bordered by Bedmond Road, the rear gardens to dwellings at Woodfield Drive and the access road to Bunkers Park is identified for use as public leisure space within the Site Allocations DPD but currently comprises an open field.
- 3.5 To the south of the site and on the opposite side of the carriageway at Bunkers Lane there are a number of residential units including the grade II listed building complex at Bunkers Farm.

#### **4. BACKGROUND**

- 4.1 West Herts Crematorium Joint Committee (WHCJC) was established in 1953 to serve the residents of its five constituents (Dacorum Borough Council, Hertsmere Borough Council, St. Albans City and District Council, Three Rivers District Council and Watford Borough Council) by providing cremation services. These cremation services currently operate from a single site at West Herts Crematorium, Garston.
- 4.2 The proposals follow the identification by WHCJC of a need for a new crematorium facility to accommodate an increase nationally and locally in cremations and given a lack of capacity at West Herts Crematorium, Garston. Cremations accounted for 77% of all funeral in the UK in 2017 and 78% of all funerals in the UK in 2018. The demand has increased significantly in recent years as a result of demographic changes in the population.
- 4.3 WHCJC appointed Haverstock to design and secure planning permission for a new single chapel crematoria at the application site. Haverstock have significant experience in crematoria design having worked on projects at Telford, Guildford and Birtton in recent years.
- 4.4 A comprehensive consultation and evaluation of the scheme has been undertaken with relevant stakeholders prior to the submission of the application including formal pre-application meetings with DBC (as planning authority) and HCC (as highway authority)

#### **5. PROPOSAL**

- 5.1 The proposal seek to provide a new crematorium building with associated services including a chapel, crematory and administrative space in three distinct areas.
- 5.2 The chapel is designed to accommodate a congregation of approximately 150 people with seating for up to 139 people within the main chapel and additional standing space for up to 115 in both the chapel and lobby/waiting area. A large glazed area to the rear of the building would provide light to the chapel space with a pond and floral tributes located within a protected external amenity space and shielded by landscape bunds from access and circulation space beyond the building.
- 5.3 Mourners will access the chapel from the Porte Cochere at the eastern end of the building. Upon leaving the chapel, the congregation are led via a covered walkway towards the floral tribute area.

- 5.4 The administrative areas for the crematorium are located at the western end of the building and includes both a large meeting room and family meeting space together with staff workstations, an archive, shower and staffrooms. The more private committal, crematory, plant room and service yard area located beyond the chapel.
- 5.5 A separate Remembrance Chapel is proposed to be constructed to the south west of the main building providing in a modest single storey pavilion for use as a quiet contemplation space for mourners and those visiting memorials. This will incorporate an external area for the preparation of floral tributes.
- 5.6 The site would be accessed off an existing service road from Bedmond Road and through the existing access to the cemetery at the site. The existing car park for the cemetery on the site would be extended from the 80 spaces currently provided to provide formal car parking for up to 140 vehicles (60 spaces) Additional parking can be provided within an overflow parking area of for a further 38 vehicles if required. 20% of these new spaces would be provided with electric charging points with the on-site infrastructure provided to extend this to all spaces.

## **6. PLANNING HISTORY**

- 6.1 The Council approved the use of the application site for a cemetery in 2017 under planning reference 4/02553/17/MFA and has since implemented proposals in relation to this use including the construction of a small building and yard for administration and management functions.
- 6.2 The proposed cemetery included two phases of development with land reserved for its expansion to the south of the main site and up to the boundary of the site with Bunkers Lane.
- 6.3 Construction of the new cemetery stated on the 10<sup>th</sup> June 2019 and although this has been completed it is anticipated that the site will open from April 2021. There is still two years burial capacity at the existing cemetery site at Woodwells cemetery, Hemel Hempstead.
- 6.4 A request for pre-application advice in relation to the construction of a crematorium (19/03234/PRED) was submitted in December 2019. The response to this pre-application request concluded that a case for very special circumstances would need to be made for the construction of this building within the Green Belt. The need for cremation facilities has been recognised as a very special circumstance in a number of appeal cases and where this would provide essential infrastructure to support the growth in population.
- 6.5 The planning conditions associated with the implementation of the cemetery (4/02553/17/MFA) have been varied under application 20/00595/NMA to allow for the use of the cemetery land prior to the completion of all landscaping works at the site. The need to implement a 2<sup>nd</sup> phase of landscaping would be superseded in the event that the proposed crematorium is approved and subject to the new landscaping scheme associated with this proposal.

## **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:

Core Strategy

NP1 - Supporting Development  
CS1 - Distribution of Development  
CS2 – Selection of Development Sites  
CS5 – Green Belt  
CS8 – Sustainable Transport  
CS12 - Quality of Site Design  
CS13 – Quality of Public Realm  
CS14 – Economic Development  
CS23 – Social Infrastructure  
CS25 – Landscape Character  
CS26 – Green Infrastructure  
CS27 – Quality of the Historic Environment  
CS28 – Carbon Emission Reductions  
CS29 - Sustainable Design and Construction  
CS30 – Sustainability Offsetting  
CS31 – Water Management  
CS32 – Air, Soil and Water Quality  
CS35 – Infrastructure and Developer Contributions.

Local Plan

Policy 13 – Planning Conditions and Planning Obligations  
Policy 51 – Development and Transport Impacts  
Policy 54 – Highway Design  
Policy 97 – The Chilterns Area of Outstanding Natural Beauty.  
Policy 99 – Preservation of Trees, Hedgerows and Woodlands

Supplementary Planning Guidance/Documents:

Accessibility Zones for the Application of Car Parking Standards  
Chilterns Building Design Guide  
Energy Efficiency and Conservation  
Water Conservation

## **9. CONSIDERATIONS**

Policy and Principle

9.1. The application site forms part of a wider parcel of land known as Bunkers Park and subject to site allocation MU/5 within the Site Allocations DPD. This sets aside an area of

12.3 ha for the provision of a new leisure space and cemetery and is closely connected to policy H/6 for the relocation of Leverstock Green Tennis Club to the application site and the use of their land for residential purposes. The proposals for the development of the site do not prejudice the delivery of these leisure facilities on land to the north of the access road and rear of residential units at Woodfield Drive.

- 9.2 The application site is located within the Green Belt where in accordance with the National Planning Policy Framework (NPPF) and Policy CS5, the local planning authority should regard the construction of new buildings as inappropriate development. Although the use of land for a crematorium is acceptable in the Green Belt as set out in paragraph 146 of the NPPF, the proposed buildings are considered to constitute inappropriate development within the area as they are of significant scale and would not preserve the openness of the area.
- 9.3 The applicants have made a case that there would be very special circumstances, which would out-weigh such harm to the character and appearance of the Green Belt and justify a departure from Green Belt policy in this instance. This is based on the economic and social benefits of the scheme outweighing harm to the Green Belt designation.

#### Needs Assessment

- 9.4 The proposals follow the identification by WHCJC of a need for a new crematorium facility to accommodate an increase nationally and locally in cremations and given a lack of capacity at West Herts Crematorium, Garston. This identified need for a facility is the main special circumstance put forward in support of the planning application and is supported by a Needs Assessment by Peter Mitchell Associates
- 9.5 The need for such facilities as essential infrastructure has been established in a number of planning appeals. The crematorium should be considered as an important piece of social infrastructure and would be strongly supported under Policies CS23 and CS35 of the Core Strategy.
- 9.6 The report by Peter Mitchell Associates demonstrates that there is both a quantitative and qualitative need for a crematorium within the locality and that the need for crematoria space is best addressed through the development of a site in Hemel Hempstead. The need for a crematorium should be afforded significant weight in this decision.

#### *Quantitative Need*

- 9.7 The report provides data for both the “technical capacity” and the “practical (core) capacity” of the existing crematoria at West Herts Crematorium. The “technical capacity” is calculated on the number of funeral slots available per day, whereas the “practical capacity” refers to the core times in which services may be undertaken as preferred by bereaved families and Funeral Directors. Families will often delay funerals to a later date in the event that a core time is not available; particularly where there is a need to accommodate relatives outside of the immediate area.
- 9.8 It is widely considered that where a crematorium is operating above 80% of its practical capacity that the crematorium is under significant pressure in delivering an acceptable cremation service. This has been established in a number of appeal cases.
- 9.9 West Herts Crematorium is currently operating well above this practical capacity in peak months with peak month cremations exceeding average monthly core slots in both 2017 (108%) and 2018 (110%) Although the development of a new Crematorium at Welwyn Hatfield is expected to bring this figure below the 80% accepted level of practical capacity,

ONS projections in the number of deaths combined with the level of housing growth in both the current Core Strategy (including those with extant planning permissions) and emerging Single Local Plan will lead to West Herts Crematorium operating above practical capacity again without intervention. The lack of core capacity is replicated at a number of sites operating in a ring around the West Herts Crematorium including those at Chilterns (Amersham) (84%) Harwood Park (136%) and Luton (89%) Such deficiencies in core funeral times increases the period between death and funeral to the detriment of the bereaved and places a significant threat to burial/cremation capacity.

- 9.10 The crematorium capacity would be significantly improved with the construction of a crematorium at the Hemel Hempstead site to meet current and future needs.

#### *Qualitative Need*

- 9.11 The analysis also reveals that the new crematorium site would be closer and serve a greater proportion of residents of Dacorum than West Herts Crematorium and would significantly reduce the funeral drive times of approximately 100,000 people living within 20 minutes of the new crematorium. This has qualitative impacts upon the bereaved, Funeral Directors and those officiating at funerals. At present a significant proportion of the population of the Borough live outside an acceptable 30 minute travel time to existing crematoria. This will be addressed through the construction of a crematorium at this site.
- 9.12 The Crematorium at Hemel Hempstead will have a single chapel and offer 60 minute funeral service intervals. This generous interval times and the site movement strategy will minimise any congestion occurring at the site and lead to improvements in the overall quality of the funeral experience. It will also allow extended service intervals at West Herts Crematorium thereby enhancing the qualitative experience of bereaved people at this venue.

#### *Alternative Sites*

- 9.13 The Cremation Act 1902 (As Amended by the Cremation Act 1952) sets out the crematoria must be at least 200 yards from any dwelling and some 50 yards from the public highway and as such there is a natural preference for these to be located in accessible rural sites. These sites need to be some 2-4 hectares in size to meet operational requirements of WHCJC and other crematoria providers.
- 9.14 The applicants have undertaken an assessment of alternative sites to demonstrate that the application site is the most appropriate for the development of the crematorium. This provides a strategic level analysis of existing crematoria alongside a consideration of the constraints presented by the extensive Green Belt and AONB designations in the wider region. The search of the local area and operational area of WHCJC identified a gap in crematoria provision within the Dacorum Borough and the application site is one of few sites owned by a local authority, sufficient in size and available for the expedient delivery of a crematorium.
- 9.15 The detailed assessment of sites has identified that there are no other sites within the Borough that would meet the requirements of the Cremation Act nor constrained by important landscape planning designations. An evaluation of Green Belt locations within the Borough indicates that the application site performs a relatively limited role in supporting the purposes of Green Belt policy as set out in paragraph 134 of the NPPF and in this context is less sensitive than other rural or edge of settlement sites.
- 9.16 The local authorities own analysis of the Green Belt locations as set out in the Stage 2 – Green Belt Review (Arup 2016) concludes that the development of the site “may partially

compromise the ability of the wider Green Belt” However, the site is part of a weaker subset of the land parcel assessed being contained by natural boundaries which limit encroachment upon the countryside. To conclude, the development of the site would result in only limited harm to the open character and appearance of the Green Belt and its objectives.

- 9.17 Hemel Hempstead is clearly the most appropriate location for the new crematoria within Dacorum given the size of its population, considering the anticipated and projected growth of the town and an imbalance between population and existing infrastructure. The semi-rural nature of the site meets the legislative requirements of the Cremation Act whilst being well connected to the transport network. There is also a synergy with the existing use of the site as a cemetery.

#### Impact on Visual Amenity and Openness

- 9.15 The application is accompanied by a Landscaping and Visual Impact Assessment (LVIA) which demonstrates that the proposed building will have a relatively limited impact on the visual amenities of the area and the wider open character and appearance of the Green Belt in this location.
- 9.16 The proposed building will occupy a limited proportion of the applications site, in close proximity to existing buildings and works forming part of the development of a cemetery at the site. The LVIA demonstrates that there are limited views across the application site and that the site is contained by extensive landscaping along its boundaries.
- 9.17 The landscaping of the site boundaries will be significantly enhanced through the development of areas or woodland and landscaping to the south and west of the site reducing the visual prominence of any buildings. Although this landscaping will spatially reduce openness, it will enhance the function of the wider Green Belt by providing a clear, permanent and defensible Green Belt boundary.
- 9.18 The overall conclusion would be that the proposals result in limited harm to the open character and appearance of the Green Belt and the purposes of the Green Belt at both a local and strategic level. This limited harm is outweighed in the planning balance by economic and social factors.

#### Layout, Scale and Design

- 9.19 The Council still expects a high quality design to be pursued in this location in accordance with Policy CS12 and CS13 of the Core Strategy.
- 9.20 The layout and site coverage of the proposals is considered to be appropriate in accordance with these policies. The layout of the site allows for access and parking areas to be shared between the existing cemetery and the crematorium use of the site. A tree lined avenue would direct people from the entrance towards the chapel and Porte Cochere from the parking areas and allow for the congregation of people directly outside the chapel at the eastern end of the proposed building. A diagonal pathway lined with smaller tree species would direct visitors across the site and between the car parks, floral tributes and remembrance chapel.
- 9.21 The building would be surrounded by a series of earth bunds providing shelter and solitude to the crematorium and associated memorial areas, protecting views from the chapel towards the landscaped grounds/screening circulation of the hearse of the crematoria and assisting with the movement strategy for the site. The intention is to limit the visual impact

of the building upon the open countryside in accordance with the aims and objectives of Green Belt policy.

- 9.22 The building itself has been kept low profile to minimise the overall visual impact of the building in the landscape and a muted material palette has also been chosen to match those of nearby barns, farm buildings and the landscaping. Timber and light brickwork have been selected for external walls with the bulk of the building being timber clad. A dark zinc finish will be provided to the roof as per the existing cemetery building. The geometry of the roof is reflected in earth bunds to the front of the site. The use of high quality materials will be continued through the hard landscaping of the site.
- 9.23 The proposals are considered to be appropriate in terms of their design, bulk, scale, height and use of materials resulting in an exceptional design in accordance with Policies CS12 and CS13 of the Core Strategy.

#### Impact of Heritage Assets

- 9.24 Policy CS27 of the Core Strategy favours the conservation of heritage assets both above and below ground level.
- 9.25 The site is located opposite the grade II listed Bunkers Farm complex and as such it is prudent to assess any impact upon the building resulting from the proposed development. The proposed development is considered to have a minor visual impact on the grade II listed Bunkers Farm complex and this is identified in the LVIA as resulting in less than substantial harm in terms of the NPPF. Given that there are no direct views from the listed buildings to the proposed building and that the proposed crematorium building would be located a substantial distance from this property in accordance with the Cremation Act, it is clear that the proposals would not be detrimental to the setting nor conservation of this building(s)
- 9.26 The application site has also previously been subject to archaeological survey works associated with the construction of the cemetery at the site. The County Archaeologist has indicated that the proposals are unlikely to have any significant impact upon archaeological remains and that no further survey works are to be required as a result of this development.
- 9.27 As such the proposals should be considered to be acceptable under Policy CS27 of the Core Strategy and relevant sections of the NPPF.

#### Landscaping and Ecology

- 9.28 The site is subject to a detailed Landscaping Strategy by Plincke. This will see the introduction of 35 specimen trees and approximately 13,800 whips within woodland planting areas (21 trees per 100m<sup>2</sup>) together with the retention of existing trees and hedgerows upon the site and its perimeter.
- 9.29 The proposals will also see the introduction of a number of earth bunds and retaining gabion walls to screen the main building from wider views across the site, frame access routes within the site and provide a protected and tranquil setting for services and the viewing of floral tributes. These angular earthworks will be carpeted by a mix of meadow flowers, grassland and grass lawns. Views from the chapel to the south of the site will be protected and shielded from the passing cortege vehicles passing round the back of the building at a lower road level.
- 9.30 High quality hard landscaping materials have been utilised throughout the scheme.

- 9.31 A sympathetic lighting scheme has been designed with low level bollard lighting to the main crematorium building and pathways carefully positioned to avoid excessive light spillage and restricted to use in operational hours.
- 9.32 The site provides an important opportunity to enhance local green infrastructure and these have been utilised through the creation of green corridors in accordance with Policy CS26 of the Core Strategy. New habitat will be supplemented by the inclusion of bat boxes, bird boxes and hedgehog boxes, insect nesting aids and bumblebee boxes.

#### Access, Parking and Highway Safety

- 9.33 The application is accompanied by a detailed Transport Assessment by Mode Transport Planning who have assessed the implications of the crematorium development upon the surrounding highway network in terms of trip generation and capacity. This assessment takes into account the cumulative impact of the existing cemetery, the proposed crematorium and a proposed use of land to the north of the access road for leisure purposes in accordance with the MU/5 (Bunkers Park) and H/6 (Leverstock Green Tennis Club) of the Site Allocations DPD to demonstrate that the proposals would not result in substantial harm to matters of highways safety and would be in general compliance with Policy CS8 of the Core Strategy.
- 9.34 The site is accessible via the M1, A414, A4147 (Hemel Hempstead Road) and Bedmond Road and is well located to serve residents within the operational area of WHCJC. It is ideally located to be within a 30 minute drive of residents of Dacorum providing a reasonable travel distance/time for residents of settlements to the west of Hemel Hempstead and the rural surroundings thereto.
- 9.35 The site will be accessed from the existing track off Bedmond Road with a new tree lined road created to the cemetery and crematorium. The cemetery car park area (80 spaces) is proposed to increase with an additional 60 spaces proposed as part of the crematorium development with a further 38 spaces could be provided in an overflow car park area. 20% of these spaces will incorporate Electric Car Charging Facilities (12 spaces) with the infrastructure provided to extend this to all spaces as necessary.
- 9.36 The existing access point to Bedmond Road is considered to provide a safe means of access to the site with improvements to the access track having been undertaken to facilitate access by larger vehicles including refuse and fire tenders. There is adequate access and circulation space both to and within the site for such vehicles in accordance with Policies CS8 and CS12 of the Core Strategy and as demonstrated in the associated vehicular tracking exercises. Indeed the height of the Porte Cochere is sufficient to allow access by double decked buses and other 'unusual' cortege vehicles. The proposed development will not have a significant adverse impact on highways safety and the operation of Bedmond Road.
- 9.37 There are no specific parking standards for crematoria within Saved Appendix 5 of the Local Plan 1991-2011 and as such the proposed parking levels for the site have been calculated using data from traffic surveys undertaken at the applicants sister site at West Herts Crematorium. The dominant mode of transport to this site is private car with a significant element of car sharing occurring by visitors. Given the capacity of the crematorium chapel and the comparative crematorium data the provision of 60 additional spaces is considered to be reasonable in accordance with Policies CS8 and CS12 of the Core Strategy and Saved Appendix 5 of the Local Plan 1991-2011.
- 9.38 Although it is accepted that the majority of visitors to the site will arrive by private car, the site is served by bus stops a short walk from the site entrance. A financial contribution of

£11,000 is required to enable these bus stops to be upgraded and make the site accessible for all parties in accordance with Policy CS8 of the Core Strategy. This will be secured by an agreement under Section 106 of the Town and Country Planning Act 1990 (As Amended)

### Flood Risk and Drainage

- 9.39 The proposed drainage strategy for the site allows for surface water run-off to flow to a detention basin at the lowest point of the application site before entering a soakaway bore hole. This detention basin and borehole was provided in relation to the development of the cemetery at the site and is sufficient in size to accommodate both surface water run-off from the cemetery site and crematorium. The flow rate to this facility will be reduced by the provision of SuDs features.
- 9.40 The drainage strategy has been considered by both the Lead Local Flood Authority and Environment Agency and subject to the imposition of planning conditions is considered to be appropriate to ensure that the site is protected from flooding and that it does not pose any significant risk to groundwater in terms of contamination.

### Air Quality and Emissions

- 9.41 There are a number of concerns from local residents regards the emissions associated with cremation and the impact upon air quality, the environment and residential amenity. In particular there are concerns with regards to the emission of CO<sub>2</sub> and the abatement of mercury emissions and carcinogenic material during the cremation processes and the threat of such emissions to the health and wellbeing of the local population.
- 9.42 Cremation is recognised as an industrial process which has potential to release pollution to the atmosphere and as such is subject to pollution control under the Environmental Permitting (England and Wales) Regulations 2016. All new crematoria are required to have abatement technology and management and operational practices to minimise or prevent emissions. These are regulated by the Environmental Health team.
- 9.43 The CO<sub>2</sub> emissions associated with the proposed crematoria have been investigated by WHCJC who have concluded that a gas cremator will be the most practical, economical and energy efficient solution for the needs of the crematorium. In doing so, the merits of a new range of electric cremators have been investigated as has the longevity and future adaption of any cremator installed. It is noted that data on the efficiency and use of electric cremators is limited given the limited use of such cremators in the Netherlands and UK. It is understood that such cremators take longer to pre-heat and will need to run closer to full temperature for longer than gas alternatives and this might require the cremator to run more frequently than the gas alternative.
- 9.44 This is likely to be less efficient given that variation in the number of cremations performed on a daily basis and will adversely impact on energy use and CO<sub>2</sub> emissions.
- 9.45 It is also understood that alternative techniques such as Cryomation (freezing the body to remove moisture) and Resomation (dissolving the body in a heated alkaline solution) which might remove pollution from mercury, particulates and CO<sub>2</sub> emissions have not been frequently deployed given that they produce unsuitable remains/effluent. Indeed there are few viable alternative to cremation or burial.
- 9.46 The siting of the crematoria building is heavily regulated under the Crematoria Act 1902 to ensure its relationship with neighbouring land uses is appropriate. The emissions from the crematoria will be regulated under licence from the Environmental Health team to ensure

that fumes are abated before emission. A mercury emission of 20 microgrammes per cubic metre is anticipated to be emitted from the cremator significantly less than an unabated cremator and well within recommended guidelines. This is likely to decline from a peak in 2020 due to the replacement of mercury amalgam tooth fillings with mercury free composite fillings.

### Sustainability

- 9.47 The proposed building has been designed to be energy efficient with a focus on improving the performance of the building fabric and the sourcing of sustainable and efficient building materials for use in its construction. A high performing thermal envelope and ventilation strategy will ensure the buildings heating and cooling energy consumption and CO2 emissions are kept to a minimum throughout the life of the building.
- 9.48 Energy efficient services will consume the minimum energy possible within the building whilst a heat recovery system will be utilised to reuse the heat generated by the cremators and the mercury abatement system to heat the space and hot water systems. The chapel itself will be south facing with significant glazing to provide light and allow benefits from solar gain. This will be supplemented by the use of PV panels upon the rear roof slope to provide a renewable and clean source of energy. The proposal will support the wider sustainable building objectives and principles including minimised energy and water use, use of natural resources, habitat creation and sustainable drainage in accordance with Policy CS29 of the Core Strategy.
- 9.49 Low usage appliances and fittings will be used throughout the building to ensure that water is conserved and managed where possible in accordance with CS29 and CS31 of the Core Strategy and the Water Conservation SPD.
- 9.50 It is acknowledged that cremation as a process utilises a significant amount of energy and results in the release of carbon emissions to the atmosphere and as such there is an inevitable conflict with the Councils approach to carbon emissions set out in Chapter 18 and Policy CS28 of the Core Strategy and the declaration of a climate emergency. Cremation is however accepted as being necessary to manage the demands arising from death and is heavily regulated to ensure that emissions are minimised and abated. There is little doubt that as technology advances that such emissions will continue to decline and be managed within the life cycle of this development.
- 9.51 The application incorporates a significant element of planting which is beneficial in off-setting carbon as set out in Policies CS29 and CS30 of the Core Strategy.

### Developer Contributions and Infrastructure

- 9.52 The provision of adequate cremation facilities and burial space is considered to be an essential societal need and as such is supported by Policy CS23 of the Core Strategy.
- 9.53 In accordance with Policy CS35 of the Core Strategy, all developments are expected to contribute towards the cost and provision of on-site, local and strategic infrastructure necessary as a result of development. The proposed use of the site is not subject to charge under the Community Infrastructure Levy (CIL) and as such would not contribute towards infrastructure provision through the payment of CIL.
- 9.54 The site is however expected to be accessible for all parties who may wish to attend Cremations and as such the Council and the County Council as highway authority will seek to cover the costs of improvements to the nearest local bus stops serving the site in accordance with Policies CS8, CS12 and CS35 of the Core Strategy. In accordance with

the request of HCC the developer is required to enter into a legal agreement to pay a sum of £11,000 towards such matters.

## Other Matters

### *Conditions*

- 9.55 The number of planning conditions associated with this proposals have been reduced from to those reasonable, necessary and enforceable in relation to the development. In particular, the submission includes full details of site drainage such that the request for further details by the Environment Agency for Foul and Surface Water are considered to be otiose. The conditions have been discussed with the Lead Local Flood Authority to ensure that the surface water drainage is appropriate and does not lead to flooding or contamination of water courses at the site.
- 9.56 The overall flue height has been confirmed at 9m in height and further details of air quality modelling have been provided. These are expected to remove the need for the condition suggested by the Environmental Health Officer in Appendix A.

### *Petition*

- 9.57 A petition was circulated to the Council in relation to the current access to the site and the height restriction barrier thereto. There are a number of concerns relating to the potential illegal entry and use of the site to the rear of properties in Woodfield Drive which it is claimed has been exposed to trespass since the implementation of the cemetery proposals. This is not directly relevant to the consideration of this application.
- 9.58 Following the submission of the petition, it is understood that the Estates team and Landscaping teams of the Council have met with Councillor Maddern to address these concerns. There is an agreement in place for a trench and additional planting to be undertaken to this boundary by the Borough Council.

### *Procedure*

- 9.59 The application needs to be referred to the SOS in view of its Green Belt location and given the size of the proposed building. In the event that the proposals are not called in for a decision, the application may be determined by the Borough Council. The Borough Council is required to provide 21 days for such matters to be considered.
- 9.60 As the land is owned by the Borough Council any associated legal agreement will need to be prepared in favour of the County Council to be enforceable. A legal agreement will secure a contribution of £11,000 toward bus stop improvements.

## **10 CONCLUSION**

- 10.1 Given the above matters, it is concluded that although the construction of a crematorium building would comprise inappropriate development in the Green Belt, the economic, environmental and social benefits arising from its construction and use amount to “very special circumstances” (VSC) These VSC would clearly outweigh the limited physical harm to the Green Belt, its aims and objectives resulting from the proposals.

## **11 RECOMMENDATION**

- 11.1 a) That in accordance with the Town and Country Planning (Consultation) (England) Direction 2009 the application be **REFERRED** to the Secretary of State (DCLG)

b) In the event that the Secretary of State does not call in the application that the application is **DELEGATED** with a **VIEW to APPROVAL** subject to the completion of a planning obligation under S106 of the Town and Country Planning Act 1990 as amended and subject to the conditions below:

c) That the following Heads of Terms for the planning obligation are agreed:

- a sum of £11,000 is secured for the improvement of bus stops in the vicinity of the application site.

**Condition(s) and Reason(s):**

- 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:**

**1203-1000-OS Plan (Site Location Plan)**  
**1203-D036A (Design and Access Statement)**  
**0569-PLI-XX-XX-RP-L-0001-P08 (Stage 3 Report Landscape Design by Plincke – May 2020)**  
**1203-P1001 (Proposed Site Plan)**  
**1203-P1002 (Proposed Ground Floor Plan)**  
**1203-P1003 Revision A (Proposed Roof Plan)**  
**1203-P2000 Revision A (Proposed Elevations – Main Building)**  
**1203-P2001 (Proposed Elevations – Chapel of Remembrance)**  
**1203-P2002 Revision A (Proposed Section – Main Building)**  
**1203-P2003 (Proposed Section – Chapel of Remembrance)**  
**1203-D040 (CGI Visual – Crematorium Approach)**  
**0569-PLI-00-ZZ-DR-L-0100-P11 (Landscape Masterplan)**  
**0569-PLI-97-XX-SH-L-0001-P03 (Outline Landscaping Specification)**  
**0569-PLI-94-XX-SH-L-0002-P01 (Soft Landscaping Schedule)**  
**0569-PLI-00-ZZ-DR-L-0160-P06 (External Material Measurement)**  
**0569-PLI-00-ZZ-DR-L-0161-P05 (Hard Landscaping Strategy)**  
**0569-PLI-00-ZZ-DR-L-0162-P04 (Soft Landscaping Strategy)**  
**0569-PLI-00-ZZ-DR-L-0163-P03 (Biodiversity Enhancement Strategy)**  
**0569-PLI-00-ZZ-DR-L-0300-P06 (Tree Retention and Removal Plan)**  
**J4053-C-DR-1001 (Drainage Plan)**  
**J4053-C-DR-1002 (Drainage Plan)**  
**J4053-C-DR-1003 (Drainage Plan)**  
**J4053-C-RP-0002 Rev 06 Status S3 (Site Wide Sustainable Drainage System Strategy)**  
**Ecological Opportunities Strategy by Ecology and Land Management – May 2020**  
**Energy and Sustainability Report by RHB Partnership – May 2020**  
**Landscape and Visual Impact Assessment by Plincke – May 2020**  
**Preliminary Ecological Appraisal by Ecology and Land Management – May 2020**  
**Transport Assessment by Mode, May 2020**

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

3. **No development 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. **The development hereby approved, shall not be used, until the means of access, parking and circulation areas have been provided fully in accordance with the approved plans.**

Reason: To ensure the provision and retention of adequate access and parking facilities for the site in accordance with Policies CS8 and CS12 of the Core Strategy.

5. **The soft landscaping works shall be planted in accordance with the Soft Landscaping Schedule (0569-PLI-94-XX-SH-L-0002) 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 ensure the adequate landscaping of the site in accordance with Policies CS12, CS26 and CS29 of the Core Strategy.

6. **No development shall take place until protective fencing has been provided in accordance with the Tree Retention and Removal Plan (0569-PLI-00-ZZ-DR-L-0300-P06) The fencing shall remain in-situ and be free from the storage of construction material, plant and machinery for the duration of the construction period.**

Reason: To ensure the adequate protection of trees and landscaping features in accordance with Policy CS12 and Saved Policy 99 of the Local Plan 1991-2011.

7. **Notwithstanding the details indicated on the submitted drawings, no on-site works shall commence until a detailed scheme for the offsite highway works as indicated on drawing J32-4812-PS-007 (Temporary Construction Access) have been submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority. The works shall be carried out fully in accordance with the approved details.**

Reason: In the interests of highways safety and in accordance with Policies CS8, CS12 and CS26 of the Core Strategy.

8. **The temporary access shall be closed and landscaped to the satisfaction of the Local Planning Authority prior to the commencement of the use of the site.**

Reason: In the interests of highways safety and in accordance with Policies CS8, CS12 and CS26 of the Core Strategy.

**9 No development shall take place until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. The Construction Management Plan shall include details of:**

- a) Construction vehicle numbers, type, routing;**
- b) Swept path analysis for the largest anticipated vehicle to use the temporary access;**
- c) Traffic management requirements;**
- d) Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas);**
- e) Siting and details of wheel washing facilities;**
- f) Cleaning of site entrances, site tracks and the adjacent public highway;**
- g) Timing of construction activities (including delivery times and removal of waste);**
- h) Provision of sufficient on-site parking prior to commencement of construction activities; and**
- i) Post construction restoration/reinstatement of the working areas and temporary access to the public highway.**

Reason: In the interests of highways safety in accordance with Policies CS8 and CS12 of the Core Strategy.

**10 The site shall be surveyed fully in accordance with the Recommendations in Table 9 of the Preliminary Ecological Appraisal by Ecology and Land Management dated 20<sup>th</sup> May 2020 prior to the commencement of any works thereto. Where necessary appropriate mitigation measures shall be undertaken to ensure the protection of species in accordance with relevant legislation.**

Reason: To ensure the adequate protection of habitat and species in accordance with Policy CS26 of the Core Strategy.

**11 The development, hereby approved, shall not be used until the measures for enhancing the sites biodiversity on the Biodiversity Enhancement Strategy Plan (0569-PLI-00-ZZ-DR-L-0163) have been provided in accordance with the approved details. These measures shall be managed in accordance with Table 7 of the Ecological Opportunities Strategy and shall thereafter be retained.**

Reason: To ensure the delivery of biodiversity improvements in accordance with Policies CS26 and CS29 of the Core Strategy.

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

Reason: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from contamination sources in accordance with paragraph 170 of the NPPF and Policy CS31 of the Core Strategy.

**13 No drainage system for the infiltration of surface water to the ground are permitted other than with the written consent of the Local Planning Authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters and must be carried out in accordance with the approved details.**

Reason: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by the mobilised contaminants in accordance with paragraph 170 of the NPPF and Policy CS31 of the Core Strategy

- 14 Piling and other deep foundation designs using penetrative methods shall not be carried out other than with the written permission of the Local Planning Authority. The development shall be carried out in accordance with the approved details.**

Reason: Some piling techniques can cause preferential pathways for contaminants to migrate to groundwater and cause pollution and as such should not be undertaken in the interest of water management under Policy CS31 of the Core Strategy.

- 15 The development permitted by this planning permission shall be carried out in accordance with the approved Site Wide Sustainable Drainage Systems Strategy dated 27 August 2020, reference J4053-C-RP-0002 Rev 06 Status S3, prepared by Webb Yates Engineers and the following mitigation measures:**

**1. Limiting the surface water run-off generated by the 1 in 100 year + climate change (+40%) critical storm so that it will not exceed the greenfield run-off from the undeveloped site and not increase the risk of flooding off-site.**

**2. Provide attenuation to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + climate change event**

**3. Surface water to be managed, attenuated and treated on site through the installation of permeable paving and sub base on all car parking spaces, with tarmac access roads draining to the permeable paving (Shaded orange on drainage plan dated 24/08/20); a swale along the southern perimeter of the southern internal ring road; permeable paving to the perimeter external areas around the crematorium building (dark blue shaded area on drainage plan dated 24/08/20); and a granular filter trench prior to discharge into the existing attenuation pond; separate filter trenches at the base of each earth bund to mitigate the risk of overflow towards the proposed buildings.**

**4. Final discharge of surface water from the development via deep bore soakaway at a restricted rate of 1.66l/s via a hydro brake.**

**5. Maintain and manage existing and proposed surface water drainage and surface water overland flow routes within the proposed site without increasing flood risk to the surrounding area.**

**The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.**

Reason: To manage the drainage of water from the site in the interest of flood prevention and the prevention of contamination to groundwater in accordance with Policy CS31 of the Core Strategy.

**16 No development shall take place until the final design of the drainage scheme is completed and sent to the LPA for approval. The surface water drainage system will be based on the submitted Site Wide Sustainable Drainage Systems Strategy dated 27 August 2020, reference J4053-C-RP-0002 Rev 06 Status S3, prepared by Webb Yates Engineers. The surface water drainage scheme should include:**

**1. Detailed falling head tests for the deepbore soakaway. All calculations should be updated with the measured infiltration rate found on site. The scheme shall subsequently be updated with the measured rate, as well as any updates needed to the drainage strategy and the proposed scheme. If infiltration is found not to be feasible an alternative surface water discharge mechanism and drainage strategy will need to be provided.**

**2. Detailed infiltration testing in accordance with BRE Digest 365 where shallow infiltration is proposed at the location of the permeable paving within the car parking areas and any other areas where shallow infiltration is proposed. This should be undertaken at the exact location and depth of the proposed infiltrating features.**

**3. A detailed drainage plan including the location and provided volume of all SuDS features, pipe runs and discharge points into any storage features. If areas are to be designated for informal flooding, these should also be shown on a detailed site plan.**

**4. Detailed engineered drawings of the proposed SuDS features including cross section drawings, their location, size, volume, depth and any inlet and outlet features including any connecting pipe runs. All corresponding calculations/modelling should be included to ensure the scheme caters for all rainfall events up to and including the 1 in 100 year + 40% allowance climate change event.**

**5. Ensure the discharge rate and volume into the existing attenuation pond is sufficient to cater for the 1 in 100 year + 40% for climate change event. This should include total volumes from both Phase 1 and 2 to confirm the total volume and freeboard of the pond is sufficient.**

**6. If there will be any areas of informal flooding these should be shown on a plan, specifying how these areas will be management.**

**7. Provision of half drain down times within 24 hours**

**8. Demonstrate appropriate SuDS management and treatment and inclusion of above ground features such as permeable paving**

**The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodied within the scheme or within any**

**other period as may subsequently be agreed, in writing, by the local planning authority.**

Reason: To prevent an increase in risk of flooding both on and off site in accordance with Policy CS31 of the Core Strategy.

**17 Upon completion of the drainage works for the site in accordance with the timing / phasing, a management and maintenance plan for the SuDS features and drainage network must be submitted to and approved in writing by the Local Planning Authority. The scheme shall include:**

**1. Provision of a complete set of as built drawings for site drainage. As built drawings should include all SuDS features including inlet and outlet features and associated drainage infrastructure including the existing attenuation pond and deep bore soakaway**

**2. A management and maintenance plan including the maintenance and operational activities.**

**3. Arrangements for adoption and any other measures to secure the operation of the scheme throughout its lifetime.**

Reason: To reduce the risk of flooding to the proposed development in accordance with Policy CS31 of the Core Strategy.

## **APPENDIX A: CONSULTEE RESPONSES**

<b>Consultee</b>	<b>Comments</b>
Nash Mills Parish Council	Nash Mills Parish Council does not object to the application however they support the concerns of residents in relation to access to land, CCTV and use of the field adjacent to the rear gardens of Woodfield Drive. In addition we request that DBC give consideration to improvements to the bus stops on Bedmond Road to facilitate sustainable and safe access to the site and for the provision of a construction management plan to be conditioned.
Hertfordshire County Council Archaeological Unit	<p>The application site was subject to an archaeological trial trench evaluation in 2018. This was followed by an open area archaeological excavation at the northern end of the site in 2019 and archaeological monitoring of some groundworks associated with the formation of a cemetery.</p> <p>A small proportion of the proposed crematorium appears to lie within the boundary of these investigations and the trial trench evaluation of the remainder of the development area did not identify significant archaeological remains.</p>

	In this instance therefore, I consider that the development is unlikely to have a significant impact on heritage assets of archaeological interest and I have no comments to make upon the proposals.
Hertfordshire County Council Ecology Unit.	No comments received.
Hertfordshire Constabulary	In relation to crime prevention I have no objections regarding this application
Hertfordshire County Council Highways Department	<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. No development shall commence until full details have been submitted and approved in writing by the Local Planning Authority to illustrate the following: • Details of when and how the dedicated pedestrian crossing point (and any associated footway improvements) on Bedmond Road at the site access to allow pedestrians to access the current footway provision on the north-east side of the road as approved as part of the previously consented cemetery application (4/02553/17/MFA) is to be provided.</p> <p>Reason: To ensure satisfactory development of the site and a satisfactory standard of highway design and construction in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).</p> <p>2. Provision of Access, Parking and Servicing Areas Prior to the first use of the development hereby permitted the proposed access, on-site parking, servicing and turning areas shall be laid out, demarcated, levelled, surfaced and drained in accordance with the approved plans 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> <p>3. A. Temporary Access Highway (Section 278) Works – Offsite (Design Approval) Notwithstanding the details indicated on the submitted drawings no on-site works shall commence until a detailed scheme for the offsite highway works as indicated on drawing J32-4812-PS-007 have been submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority. B. Temporary Access Highway (Section 278) Works – Offsite (Implementation / Construction) No development shall commence until</p>

the offsite highway improvement works referred to in Part A of this condition have been completed in accordance with the approved details.

Reason: To ensure construction of a satisfactory development and that the highway improvement works are designed to an appropriate standard in the interest of highway safety and amenity and in accordance with Policy 5, 13 and 21 of Hertfordshire's Local Transport Plan (adopted 2018).

4. Construction Traffic Management Plan: No development shall commence until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the construction of the development shall only be carried out in accordance with the approved Plan. The Construction Management Plan shall include details of: a. Construction vehicle numbers, type, routing; b. Swept path analysis for the largest anticipated vehicle to use the temporary access (this would need to be linked to proposed S278 works) c. Traffic management requirements; d. Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas); e. Siting and details of wheel washing facilities; f. Cleaning of site entrances, site tracks and the adjacent public highway; g. Timing of construction activities (including delivery times and removal of waste); h. Provision of sufficient on-site parking prior to commencement of construction activities; i. Post construction restoration/reinstatement of the working areas and temporary access to the public highway (this would need to be linked to proposed S278 works required to create the temporary highway access).

Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way in accordance with Policies 5, 12, 17 and 22 of Hertfordshire's Local Transport Plan (adopted 2018).

#### HIGHWAY INFORMATIVE:

HCC recommends inclusion of the following highway informative / advisory note (AN) to ensure that any works within the public highway are carried out in accordance with the provisions of the Highway Act 1980:

AN) Agreement with Highway Authority: 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 temporary 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 application comprises of a new crematorium with associated works on land to the south-west Bedmond Road, Hemel Hempstead. Bedmond Road is designated as a classified C secondary distributor road, subject to a speed limit of 40mph (reducing to 30mph to the north of the site) and is highway maintainable at public expense. The proposed crematorium would use share the site and access with a previously consented scheme for a cemetery (planning app. Ref. 4/02553/17/MFA). A Transport Assessment (TA) has been submitted as part of the application.

#### VEHICULAR ACCESS ARRANGEMENTS:

There is an existing vehicle access into the site approved as part of planning application 4/02553/17/MFA) and which will be utilised for the proposed crematorium. No alterations to this access are included as part of this application and HCC as Highway Authority considers that this access would be provide an acceptable vehicle access to support the combined cemetery / crematorium site. Swept path analysis / tracking plans for a hearse, refuse vehicle, bus and large car have been submitted as part of the application including within the site and at the main access from Bedmond Road. The submitted details are considered to be acceptable by HCC as Highway Authority.

#### TRIP GENERATION & DISTRIBUTION & IMPACT ON SURROUNDING HIGHWAY:

A traffic generation and distribution assessment has been included as part of the TA (Section 5), the method of which has used traffic data from an existing crematorium site (as there are no crematoria sites within the TRICS database). This approach is considered to be acceptable to HCC as Highway Authority due to lack of comparable sites within TRICS. The figures show an expected 496 daily movements, 1.4% of which would be within peak hours. The assessment also considers the cumulative impact of the crematorium, the consented cemetery and the considered leisure scheme to the

north of the application site (of which the option used is a tennis club) using a 2025 base. The capacity assessment as included in Section 6 of the TA provides an assessment of the forecast traffic impact on the site access and surrounding highway network during peak hours (0800-0900 and 1700-1800). The method of calculating the crematorium and leisure use rates is robust. Furthermore, HCC as Highway Authority consider's that the PICADY's input of geometric for the site access is acceptable. Tables 6.1 and 6.2 show that the priority junction would continue to operate well within capacity for the different 2025 scenarios, with minimal queuing on all arms. Following assessment of these details, the impact on the operation of the surrounding highway network would therefore be considered to be acceptable and not a reason to recommend refusal from a highways perspective

#### TEMPORARY CONSTRUCTION ACCESS:

A dedicated construction access from the highway on Bedmond Road is proposed to the south of the main site entrance (as indicated on drawing number J32-4812-PS-007). This has been proposed to avoid any potential conflicts between construction traffic and the existing cemetery use. HCC as Highway Authority would be not have an objection to this subject to the approval of the details, which would be required to be submitted as part of the Construction Management Plan and Section 278 Agreement with the Highway Authority (details of which are outlined in the above conditions and informative). Please obtain an extent of highway plan, which would need to be submitted as part of the 278 application.

AN) 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](http://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/changes-to-your-road/extent-of-highways.aspx)

#### CAR PARKING:

There are 70 proposed car parking spaces (in addition to the existing 80 car parking spaces), creating a total of 150 spaces (not the 140 as noted in Sec 4.4 of the TA). The additional provision would include 14 spaces with electric vehicle charging points, which HCC would be supportive of to ensure that the proposals are in accordance with Hertfordshire's Local Transport Plan 4 (LPT4) . HCC as Highway Authority would not have any specific objection to the overall level of parking (ref. section 6.5 of the TA) although Dacorum Borough Council is the parking authority and therefore would ultimately need to be satisfied with the level of proposed parking.

#### ACCESSIBILITY AND SUSTAINABILITY:

The site is located approximately 200/300m from the south-eastern boundary of Leverstock Green and Hemel Hempstead. The location has previously been considered to be acceptable to support the use as a cemetery and HCC as Highway Authority would not have any specific objections to the current application from an accessibility perspective when taking into consideration the existing and proposed uses. There is an existing highway footway on the north-east side of the carriageway (the opposite side to the site). The consented cemetery application included provision for a dedicated pedestrian crossing point on Bedmond Road at the site access to allow pedestrians to access the current footway provision. This would need to be provided in order for the proposed use (as part of this application) to be acceptable, to ensure that pedestrian access is maximised to be in accordance with LTP4. The nearest bus stops to the site are located along Bedmond Road approximately 200m to the north of the site and therefore within an acceptable accessibility distance (generally accepted to be within 400m) to encourage travel by bus to the site. The bus stops are served by half hourly services providing access to Watford, Rickmansworth and other areas within Hemel Hempstead.

#### PLANNING OBLIGATIONS:

DBC has adopted the Community Infrastructure Levy (CIL) and therefore contributions towards local transports schemes as outlined in HCC's South West Herts Growth & Transport Plan would be sought via CIL if appropriate. Nevertheless in order to make the proposals acceptable in planning terms to promote and maximize sustainable travel options, it is recommended that a 106 planning obligation is sought towards improvements at the two nearest bus stops on Bedmond Road to the north of the site, which are the nearest public transport provision. Developer contributions for the provision of easy access kassel kerbing at both stops and an area of hardstanding on the northbound stop would be required to ensure that the bus stops are accessible to all (£8000 per stop, £16,000 total). Following consideration of the location of the existing bus stops and available bus services, HCC as Highway Authority does not consider that there would be sufficient justification for the site / applicant to make provision for two new bus stops (as suggested by a local councillor).

#### CONCLUSION:

HCC as Highway Authority considers that the proposal would not have an unreasonable or significant impact on the safety and operation of the surrounding highway network. The applicant would need to enter into a Section 278 agreement with HCC as Highway Authority in

	<p>relation to the creation of the temporary construction access into the site and any associated works and provide a planning obligation toward the upgrade of the nearest two bus stops. HCC as Highway Authority has no further comments or objections on highway grounds to the application, subject to the inclusion of the above planning conditions and informatives</p> <p>Additional Comment – 30<sup>th</sup> July 2020</p> <p>To confirm the provision of easy access kerbing at the bus stops can be provided at the cost of £5000 per bus stop plus an additional £1000 to provide a hardstanding area at the north bound bus stop, therefore the total contribution requested would be £11,000 rather than the original £16,000 figure.</p>
<p>Hertfordshire County Council – Lead Local Flood Authority</p>	<p>We previously responded to this application in our letter dated 11 August 2020 objecting on flood risk grounds and provided detailed comments to explain our concerns under the following points and additional comments;</p> <p>‘In particular, the submitted FRA fails to; 1. Provide a feasible means of surface water discharge 2. Demonstrate there will be no increase in surface water run-off rates and surface water volumes 3. Demonstrate an appropriate level of water quality treatment and SuDS Hierarchy 4. Assess the impact of the existing overland flow route 5. Demonstrate appropriate management of surface water drainage exceedance 6. Provide a detailed surface water drainage scheme to support a full planning application’</p> <p>Following this we held a meeting as part of our Surface Water Advisory Service, and in response to this and the above points of objection, the applicant has provided a revised Site Wide Sustainable Drainage Systems Strategy dated 27 August 2020, reference J4053-C-RP-0002 Rev 06 Status S3, prepared by Webb Yates Engineers, which includes Appendix J with supporting comments to each of our previous points of objection.</p> <p>The drainage strategy is based on attenuation in an existing attenuation pond, with restricted discharge via a Hydrobrake at 1.6l/s before discharge via a deepbore soakaway.</p> <p>We have a concern regarding the proposed rate used in the original MicroDrainage modelling within the deepbore soakaway. From a further review of the original MicroDrainage modelling, there also looks to be an infiltration basin manhole included within the modelling where infiltration has been allowed for within MicroDrainage at a rate of 0.00005 m/hr. However, it is not known where this SuDS feature is or what it is representing.</p>

Moreover, an additional piece of modelling has been provided directly to the LPA on 14th September 2020. However, it does not clarify all issues raised by the LPA.

As a result, we would suggest that this is included via specific points in a detailed pre-commencement condition. This pre-commencement condition would need to be accepted by the applicant, otherwise we would recommend seeking this information prior to approval at planning.

In order to secure the final detail of the proposed drainage scheme, we would therefore recommend the following conditions should planning permission be granted:

#### Condition 1 - Compliance

The development permitted by this planning permission shall be carried out in accordance with the approved Site Wide Sustainable Drainage Systems Strategy dated 27 August 2020, reference J4053-C-RP-0002 Rev 06 Status S3, prepared by Webb Yates Engineers and the following mitigation measures:

1. Limiting the surface water run-off generated by the 1 in 100 year + climate change (+40%) critical storm so that it will not exceed the greenfield run-off from the undeveloped site and not increase the risk of flooding off-site.
2. Provide attenuation to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + climate change event
3. Surface water to be managed, attenuated and treated on site through the installation of permeable paving and sub base on all car parking spaces, with tarmac access roads draining to the permeable paving (Shaded orange on drainage plan dated 24/08/20); a swale along the southern perimeter of the southern internal ring road; permeable paving to the perimeter external areas around the crematorium building (dark blue shaded area on drainage plan dated 24/08/20); and a granular filter trench prior to discharge into the existing attenuation pond; separate filter trenches at the base of each earth bund to mitigate the risk of overflow towards the proposed buildings.
4. Final discharge of surface water from the development via deep bore soakaway at a restricted rate of 1.66l/s via a hydro brake.

5. Maintain and manage existing and proposed surface water drainage and surface water overland flow routes within the proposed site without increasing flood risk to the surrounding area.

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason

1. To prevent flooding by ensuring the satisfactory disposal of surface water from the site.
2. To prevent flooding by ensuring the satisfactory storage of surface water from the site
3. To provide appropriate management and treatment of surface water from the site
4. To prevent flooding by ensuring the satisfactory disposal of surface water from the site.
5. To reduce the risk of flooding to the proposed development and future occupants.

Condition 2 - Pre-commencement Final Detailed Drainage Design and Assessment

No development shall take place until the final design of the drainage scheme is completed and sent to the LPA for approval. The surface water drainage system will be based on the submitted Site Wide Sustainable Drainage Systems Strategy dated 27 August 2020, reference J4053-C-RP-0002 Rev 06 Status S3, prepared by Webb Yates Engineers. The surface water drainage scheme should include:

1. Detailed falling head tests for the deepbore soakaway. All calculations should be updated with the measured infiltration rate found on site. The scheme shall subsequently be updated with the measured rate, as well as any updates needed to the drainage strategy and the proposed scheme. If infiltration is found not to be feasible an alternative surface water discharge mechanism and drainage strategy will need to be provided.
2. Detailed infiltration testing in accordance with BRE Digest 365 where shallow infiltration is proposed at the location of the permeable paving within the car parking areas and any other areas where shallow infiltration is proposed. This should be undertaken at the exact location and depth of the proposed infiltrating features.

3. A detailed drainage plan including the location and provided volume of all SuDS features, pipe runs and discharge points into any storage features. If areas are to be designated for informal flooding, these should also be shown on a detailed site plan.

4. Detailed engineered drawings of the proposed SuDS features including cross section drawings, their location, size, volume, depth and any inlet and outlet features including any connecting pipe runs. All corresponding calculations/modelling should be included to ensure the scheme caters for all rainfall events up to and including the 1 in 100 year + 40% allowance climate change event.

5. Ensure the discharge rate and volume into the existing attenuation pond is sufficient to cater for the 1 in 100 year + 40% for climate change event. This should include total volumes from both Phase 1 and 2 to confirm the total volume and freeboard of the pond is sufficient.

6. If there will be any areas of informal flooding these should be shown on a plan, specifying how these areas will be management.

7. Provision of half drain down times within 24 hours 8. Demonstrate appropriate SuDS management and treatment and inclusion of above ground features such as permeable paving

The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodied within the scheme or within any other period as may subsequently be agreed, in writing, by the local planning authority

Reason

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

Condition 3 - Post construction SuDS Maintenance and As built drainage information

Upon completion of the drainage works for the site in accordance with the timing / phasing, a management and maintenance plan for the SuDS features and drainage network must be submitted to and approved in writing by the Local Planning Authority. The scheme shall include:

1. Provision of a complete set of as built drawings for site drainage. As built drawings should include all SuDS features including inlet and outlet features and associated drainage infrastructure including the existing attenuation pond and deep bore soakaway 2. A management

	<p>and maintenance plan including the maintenance and operational activities. 3. Arrangements for adoption and any other measures to secure the operation of the scheme throughout its lifetime.</p> <p>Reason</p> <p>To reduce the risk of flooding to the proposed development</p> <p>Informative to the LPA</p> <p>We would like to recommend the LPA seeks an appropriate detailed infiltration testing results conducted in accordance with BRE Digest 365 at the proposed location of the proposed field discharge to manage the treated effluent. This should be secured by an appropriate condition and should be provided before the development commence. As the LLFA, we can offer our help in assessing any future details requested by the LPA.</p> <p>We would recommend the LPA obtains a management and maintenance plan, to ensure the SuDS features can be maintained throughout the development's lifetime. This should follow the manufacturers' recommendation for maintenance and/or guidance in the SuDS Manual by Ciria.</p>
Environmental Health	<p><u>Contamination</u></p> <p>In the absence of any land use history on, or in the vicinity of, the application site, which would be expected to result in ground contamination that would adversely impact on the proposed end use, there are no land contamination issues that need to be addressed in taking the proposed development forward.</p> <p><u>Local Air Quality and the Environmental Permitting Regulations:</u></p> <p>A crematorium is an industrial process that has the potential to release pollution to the atmosphere and as such it is a process that is subject to pollution prevention controls under the Environmental Permitting (England and Wales) Regulations 2016 (EPR 2016). A crematorium is an activity that is classed as a Part B Activity and as such is regulated under the EPR 2016 by Dacorum Borough Council, Environmental Health.</p> <p>Within the submitted documentation it has been recognised by the applicant that, in the event that planning permission is granted, an Environmental Permit will be required in order to operate the crematorium and that compliance with that Permit will need to be maintained.</p>

	<p>Therefore, in line with Section 183 of the NPPF 2019 the following advice is:</p> <p>a) restricted to that which is specifically relevant to the planning regime and</p> <p>b) is based on the assumption that the applicant will apply for and be granted an environmental permit pursuant to the EPA 2016 and that the environmental permitting regime will operate effectively.</p> <p>It is noted from the submitted design drawings that the provisionally proposed stack height for the crematorium is 9m, but that this stack height is subject to finalisation via a D1 Stack Height Calculation and agreement with the Environmental Health Department. Therefore, it must be recognised that this stack height may need be higher than 9m subject to the outcome of the D1 process.</p> <p>Additionally it will be necessary to recommend the following condition to ensure that the final stack height is sufficient to ensure that the dispersion of the emissions, that are allowable within the controls of the environmental permit, is appropriate for the proposed development and its surrounding environment.</p> <p><u>Local Air Quality - Stack Height Condition:</u></p> <p><b>No development shall be commenced until the height of the three stacks indicated in Section BB of Drawing Title: Proposed GA Sections - Main Building (1203 -P2002) have been calculated using the D1 Stack Calculation and have been submitted in writing to and agreed by the Local Planning Authority. Depending upon the outcome of the D1 Stack Calculation the Local Planning Authority reserves the right to require air pollution dispersion modelling in reaching an agreement on the stack height.</b></p> <p><u>Reason:</u> To ensure that the issue of local air pollution is adequately addressed</p>
Environment Agency	<p>We have no objection to the application, however controlled waters are sensitive in this location because the site is within Source Protection Zone 3 and upon a secondary aquifer overlying a principal aquifer. The propose development will only be acceptable subject to the following conditions:</p> <p>Condition 1</p> <p>If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this</p>

contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented in accordance with the approved details.

Reason: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from contamination sources in accordance with paragraph 170 of the NPPF

#### Condition 2

No drainage system for the infiltration of surface water to the ground are permitted other than with the written consent of the Local Planning Authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters and must be carried out in accordance with the approved details.

Reason: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by the mobilised contaminants in line with paragraph 170 of the NPPF and to prevent the further deterioration to groundwater quality and recovery of a drinking water protected area of the Mid Chilterns Chalk Groundwater body.

#### Condition 3

The development hereby permitted shall not be commenced until such time as a scheme for the disposal of the following has been submitted to and approved in writing by the local planning authority.

- Disposal of foul drainage
- Disposal of surface water
- Installation of oil and petrol separators
- Roof drainage.

The scheme shall be implemented as approved.

Reason: To prevent the deterioration to groundwater quality and to support recovery of the drinking water protected area of the Mid-Chilterns Chalk Groundwater body.

#### Condition 4

Piling and other deep foundation designs using penetrative methods shall not be carried out other than with the written permission of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: Some piling techniques can cause preferential pathways for contaminants to migrate to groundwater and cause pollution,

	<p>Condition 5</p> <p>A scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained will be secured, protected and inspected. The scheme shall be implemented in accordance with the approved details prior to use of any part of the building.</p> <p>Reason: To ensure that redundant boreholes are safe and secure and do not cause groundwater pollution or loss of water supplies in accordance with paragraph 170 of the NPPF.</p>
<p>Leverstock Green Village Association</p>	<p>Leverstock Green Village Association wishes to make the following comments on the above plans. We would stress that we have no objection to the overall conception of the cemetery and crematorium.</p> <p>1) We do have concerns over the security of the DBC field to the right of the access road and bordering houses in Woodfield Drive. The height restriction has been removed approximately 30m along the road to allow for over-height vehicles to the cemetery however this has left the first 20m of the field unprotected from intruders. You will be aware that the height restriction was installed in the early 2000s following three incursions onto land by travellers to Bunkers Park.</p> <p>2) we also wonder about the right hand border of the access road, which, we are led believe will be grassed over. We would point out that since coronavirus lockdown many more people have discovered Bunkers Park and the small car park is quite inadequate. It has now become practice to park on the border of the access road and on occasions as far along as the cemetery gates. The whole stretch should, in our opinion be made more attractive with shrubs or trees planted on the field side of the fence. This would lessen the impact of resident's views of the cemetery, crematorium and the imposing gates.</p> <p>3) The height restriction itself overhangs the footpath at a low level and is an inherent danger to pedestrians.</p>

**APPENDIX B: REPRESENTATIONS**

<p>31 Bluebell Drive, Bedmond</p>	<p>I would disagree that it is easily accessible by foot. The footpath between Pimlico and Leverstock green is not well maintained at all. There is also the issue of cars parked on the footpath, making is extremely dangerous for those using wheelchairs and motobility scooters. Hertfordshire County Council recently added a crossing place into Bunkers Park, and improved the path towards Leverstock Green. They completely stopped at improving the paths towards Pimlico.</p>
<p>76 Brickmakers Lane</p>	<p>I have three observations and objections to the proposals.</p> <p>1. Improve Sustainability and Pollution - Alternative Technologies</p> <p>CO2 and particulate pollution had not been considered, beyond basic legal limits for an "abated" cremator. "Huntingdon Town Council has opted to install two electric cremators into their brand new facility which is due to be open this year; with several other Local Authorities following suit in the next one to two years"</p> <p><a href="https://www.thecdsgroup.co.uk/news/the-uk-cremation-industry-emissions">https://www.thecdsgroup.co.uk/news/the-uk-cremation-industry-emissions</a></p> <p><a href="https://www.huntingdowntown.gov.uk/crematorium.html">https://www.huntingdowntown.gov.uk/crematorium.html</a></p> <p>Another technology, Cryomation, was developed at University of Hertfordshire, and they are building their first unit at a cost of £1.4 million. This eliminates pollution from mercury, particulates, carbon monoxide etc., and reduces energy consumption.</p> <p>Only part of the roof has solar panels. I have not seen consideration for heat pumps, or heat storage. Study should be shown into ways to reduce heat dissipated via the "aerocooler".</p> <p>I would at least expect a comparative study, reasons</p>

	<p>for rejecting cleaner technologies (especially those adopted in Huntingdon), considering the Government's zero-carbon initiatives, mercury emissions, particulate emissions etc.</p> <p>2. Traffic Plan - Road Access Direction</p> <p>The widened road for bus access assumes traffic travelling to/from the south, but most traffic is likely to come from the north, via Leverstock Green Road, and Maylands Roundabout etc. This aspect of the plan should be reviewed.</p> <p>3. Capacity</p> <p>The parking, traffic volume study etc. assumes one cremator providing 40 services per week. The documentation shows that provision is included for a second cremator, so the revised capacity should be taken into account.</p>
356 Chambersbury Lane	<p>We object to this planning application for the proposed development of a crematorium at Bunkers Park for the following reasons:</p> <p>1) The proposed development will be located too close to existing homes/property and recreational land without there being any established natural coverage.</p> <p>2) If the proposed crematorium does not meet zero emissions, then its proximity to housing and recreational park land could be considered a health hazard.</p> <p>The 20.05.19 Energy &amp; Sustainability Report (page 9) states that "technology of crematoria is "low risk". What does low risk actually mean? Surely zero emissions would imply no risk to human health and wildlife?</p> <p>We have no objection to the cemetery that has been constructed at Bunkers Park. However, the proposed crematorium should be located further away from housing and Bunkers Open Space.</p>
1 Woodfield Drive	<p>Whilst we appreciate that there may be a need for a new crematorium I am objecting to it on the basis that cremation is a method that fuels pollution and damages the environment.</p> <p>Emissions include carbon dioxide, carbon monoxide, nitrogen oxide, sulphur dioxide, hydrogen chloride gas, hydrogen fluoride, mercury vapour. Organic</p>

	<p>compounds such as benzenes, furans, acetone are also emitted and these react with the hydrogen chloride and hydrogen fluoride under combustion conditions to form polychlorinated dibenzodioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs) both of which are carcinogens. This in itself is going to have a damaging impact on the residents and wildlife close to the proposed build.</p> <p>Cremation also uses more energy than other types of disposal and alkaline hydrolysis should be considered as an alternative method. I don't believe this alternative has been adequately investigated.</p> <p>However, if this objection is not upheld and the proposal goes ahead then it should only be on the basis that it is confirmed that a selective catalytic reduction system / deNOx system is in place to minimise the NOx emissions along with an abatement system to remove mercury and other contaminants.</p> <p>In addition, the residents along Woodfield Drive and Woodfield Gardens are going to face the increased traffic and eyesore of the forbidding entrance gates and chimney stack. In order to help alleviate this a line of fast growing trees should be planted along the right hand side of the access road to shield the view.</p> <p>The height restriction has been moved further down the access road which, whilst allowing for construction vehicles and high vehicular access to the cemetery and crematorium, has also led to potential security breaches to the field on the right hand side of the access road. This should be addressed by building a bund (or digging a ditch) along the right hand side of the access road to prevent illegal access to the field.</p>
<p>3 Woodfield Drive</p>	<p>I am a local resident which backs on to the fields, the track to Bunkers Nature Reserve and the view of the current cemetery and planned crematorium.</p> <p>It must be noted that I am disappointed of the timing of such an application during the COvid19 situation which has resulted in No public consultation or meeting with residents and the need to push ahead during lockdown. A consultation could clearly take place now with the current easing of restrictions and therefore some re-assurances to local residents before plans agreed.</p> <p>I would like to make the following comments in relation to the site as it stands and also its future plans. I am not personally making an objection to the</p>

overall conception of the cemetery and crematorium but have a couple of issues which I would like addressed which have a direct impact on my own property's privacy and also the security of all the residents as a whole.

All are known to the local Parish Councillor for Nash Mills. The following two (2) points are concerns of EVERY resident overlooking the fields from Woodfield Drive. EVERY resident has signed the petition which has been sent to yourselves for your consideration and the earliest attention please. This is 14 separate sets of residents from the properties overlooking the site.

1. I have concerns around the DBC field to the right of the access road which back onto the gardens of the properties in Woodfield Drive. Since the height restriction has been re-sited for obvious reasons further up the track, there is a stretch of approx. 25m of road/field which is protected from invasion by only an inappropriate timber fence. This section urgently needs to be protected against intrusion from vehicles which could damage this insubstantial fence and use this for other purposes. There have been numerous incursions onto this field in the past. A secure bund along this 25m stretch would deter such activity and at relatively little cost against the cost of clear up and damage after incursion.

The present access gate to the field halfway along is also in desperate need of replacement it is noted by us all and if not replaced could allow further opportunities for incursion further into the lovely Nature Reserve if damaged further.

This requires urgent action and implementation we would argue.

2. We would like to request tree screening planted within the empty field next to the track side or along the boundary of the track side of the field the length of the existing old fence line, allowing for access still to the field by authorised persons. This would shield us from the permanent view of the gates to the Cemetery site, the intrusion of CCTV where applicable and its view, and the buildings from within when the gates are open during normal operating hours. It would furthermore offer a second degree of screening away from the view of the new Crematorium as the trees grow and spread, and one level of screening for those residential properties directly overlooking the gates which obviously cannot be landscaped in front of. This would obscure them from the views of potentially 40 funeral processions

	<p>per week as they enter and leave the site from their windows.</p> <p>It is arguably also another very natural way of making the Nature Reserve and the new Crematorium more visually aesthetic with a row of trees either side and will further protect the empty field at present. I am aware that DBC has a requirement to plant a certain number of new trees each year. I ask that these be planted as soon as possible in the Autumn to create some fast screening before any building works commence as has happened on the cemetery site. The empty field area in front of the gates may need some more permanent evergreen shrubs to obscure the entrance area too from those properties directly opposite it.</p>
9 Woodfield Drive	<p>I understand that this development is necessary and have no real grounds to object to it, but to shield it from housing which overlook it in Woodfield Drive could a row of trees be put along the track field side to form a natural barrier to block the view of what is going to be a large building. Also my concerns are that now the height restriction is removed this is an open invitation to travellers which Bunkers Park has suffered from in the past. Perhaps a bund could be put there to protect against illegal entry.</p>
2 Woodfield Gardens	<p>I am aware that there is a proposed mound to provide some shielding of the building and that some trees are to be planted within the site to also hide the building but it is difficult from the available drawings to see how much this will hide. If a line of trees was provided along the right hand side of the track that leads to Bunkers Park it would provide more of a screen of the development from all the properties that back onto the field that is on the opposite side of the track from the development.</p>
3 Woodfield Gardens	<p>I have no objection to the new cemetery at Bunkers Park, however I do object to the proposed crematorium in this location.</p> <p>Sustainable Design Carbon Footprint</p> <p>For every gas cremation, approximately 245 kg of carbon is released into the atmosphere. Electric crematorium releases half the estimated NOx emissions of a gas cremator and have the capacity to utilise Selective Catalytic Reduction and is the greenest technology available. There is no current technology available to reduce CO2 emissions from gas cremators.</p>

Gas cremation is a fossil fuel method that fuels pollution and damages the environment. Emissions include carbon dioxide, carbon monoxide, nitrogen oxide, sulphur dioxide, hydrogen chloride gas, hydrogen fluoride, mercury vapour along with organic compounds which is bad for both the environment and local wildlife.

The decision of whether Dacrom Council should be installing a gas or electric crematorium which is situated on green belt land near:

\* Residential development

\* Adjacent to Bunkers Nature Reserve

\* Controlled waters are particularly sensitive in this location because the proposed development site is:

a) within an area with within Source Protection Zone 3 and

b) is located upon a Secondary Aquifer overlying a Principal aquifer.

Should be based only on what is best for the future environment, the local residents and wildlife rather than the cost of installation. Especially as the UK is working towards being carbon neutral.

#### Filtration & Abatement

The crematorium will be fitted with the latest filtration system based on existing legislation, which is already a couple of years old. They should be looking to exceed the next regulations when they come in not and just exceed ones which are becoming outdated. "Technology of crematoria is "low risk". What does low risk actually mean? Surely zero emissions would imply no risk to human health and wildlife?

The filtration system will not totally stop all particles/emissions from the crematorium it will only be monitored and must come within an agreed tolerance level. There is no information on the application of the agreed tolerance levels for all particles/emissions released into the atmosphere and how frequently they will be monitored.

#### Heat Recovery

"Any surplus heat is rejected to atmosphere via an air blast cooler. The technology is proven and low risk." What is low risk, no information given on what emissions/particles etc will be released into the

atmosphere, when this will be done, at night, will there be any noise, smell etc. There should be no risk to the environment, residents and wildlife.

#### Air Quality

"DBC planners confirmed that there is no requirement for a specific air quality assessment. The Crematorium will be monitored on emissions, particles, air quality, Mercury, exhaust flow rates."

Will the monitoring be continuous? If not why not, it should be, for the health of nearby residents, wildlife and the environment.

There will also be an increase generally in vehicle emissions from vehicles accessing the site.

How can you accurately monitor pollution/emission/mercury levels if an air quality survey has not been undertaken before works commence?

This is a concern for local residents. The prevailing wind is also relevant.

#### Chimney Stack Height

The D1 Stack Calculation has not been completed and it may need to increase in height depending on the results of the air pollution dispersion modelling to ensure the issue of local air pollution is adequately addressed.

As this is a full planning application this should have been completed before the application was made. The final stack height will be key to air pollution along with its visual impact etc on the surrounding residential area. If the stack is higher the applicant should also change their planting, bunding to reflect this and to increase the screening of the chimney from local residents.

Space for 2 x Cremators and abatement  
"Only 1 to be initially purchased and installed until additional capacity required".

No information has been given on the overall impact (including emissions/particles, traffic flow etc) between having one cremator and two cremators on site. If a second cremator is needed this should be subject to a separate planning application showing any increased emissions, impact on the site and local area etc.

Green Belt: Special Mitigating Circumstances

"As this is a major development within the green belt where in accordance with Section 13 of the National Planning Policy Framework (NPPF) and Dacorum Borough Core Strategy Policy CS5, there is a presumption against development except in specific circumstances and where any harm to the Green Belt can be clearly outweighed by other considerations. In this regard, the proposed development of a crematorium does not fall within the exceptions defined by NPPF paragraphs 145 and 146, and therefore constitutes inappropriate development in the Green Belt in planning terms. Unless there are special mitigating circumstances."

Is there a genuine need for a crematorium in this location. The application and other documentation refers to:

\* Major planning application at Hemel by St Albans Council (East Hemel Development). Planning Inspectors voiced serious concerns over the legal compliance and soundness of the St Albans City and District Council (SADC) Draft Local Plan.

SADC has responded to the Inspectors by agreeing to withdraw plans for housing on the site in Park Street, which has been earmarked for a Strategic Freight Depot, and have asked for the Examination to be resumed. It is likely that the Inspectors will insist on a new Green Belt Review before granting this request.

\* "The WHC (West Herts Crematorium) business case acknowledges that the new crematorium would take customers from the existing operation at Garston. However, they argue that Hemel Hempstead is an ideal location for a crematorium (due to the size of population within a half hour drive, the forecast growth in population (St Albans Hemel East - see bullet point above), and the relative spacing of other crematoria) and that they need to act quickly to protect their market share from new entrants.

Strategically, WHC would accept the declining profitability of Garston in order to prevent a private sector competitor entering the market, which would pose a more significant long-term threat to the existing business. Their business case indicates that Garston could absorb the lost income within the annual surplus that it currently contributes to reserves."

	<p>It seems to be more about protecting their revenue generating need than a physical need, which I would assume is not classed as 'special circumstance'.</p> <p>* It does not take into account the recently approved Welwyn Hatfield crematorium, which will potentially reduce some of the existing use from West Herts.</p> <p>* There is however a need for 'woodland burials/green burials'. DBC no longer have any grave spaces for new woodland burials. Woodwells was the only cemetery to have woodland burials in Hemel. On the DBC website it states "We are concerned with any form of damage to the environment and recognise that burials can be designed to offer many benefits to wildlife. The creation of a habitat for wildlife will assist in increasing the amount of birds, mammals, insects and flowers and also provide a burial area for those departed, who wish to 'return to nature'.</p> <p>I do not believe the planning application has fully shown special circumstances for the proposed crematorium to be built on green belt land next to Bunkers Park and a local residential area and the effects on the environment in this application.</p>
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