

**ITEM NUMBER: 5b**

<b>4/00024/19/MFA</b>	<b>Construction of 15 residential units with associated access, parking and landscaping</b>	
<b>Site Address:</b>	<b>Land off Tring Road, Wilstone</b>	
<b>Applicant/Agent:</b>	<b>Rectory Homes Ltd</b>	
<b>Case Officer:</b>	<b>Robert Freeman</b>	
<b>Parish/Ward:</b>	<b>Tring Rural Parish</b>	<b>Tring West &amp; Rural</b>
<b>Referral to Committee:</b>	<b>The application has been referred to the Development Management Committee due to a contrary recommendation to the Parish Council</b>	

**1. RECOMMENDATION**

- 1.1 That this application be **DELEGATED** with a view to **APPROVAL** subject to the completion of a planning obligation under Section 106 of the Town and Country Planning Act 1990 (As Amended).

**2. SUMMARY**

- 2.1 The proposed development is considered to deliver significant social and economic benefits in the form of housing and affordable housing and would support the sustainable development of the village of Wilstone in accordance with the National Planning Policy Framework (NPPF). These benefits are considered to weigh in favour of the grant of planning permission in this case. The Policies within the NPPF provide no clear reason for the refusal of this application.
- 2.2 The development is considered to be a high quality and accessible residential scheme and would support the planning objectives under Policies CS8, CS11, CS12, CS17, CS19 and CS20 and CS29 of the Core Strategy and Saved Appendices 3 and 5 of the Local Plan 1991-2011.

**3. SITE DESCRIPTION**

- 3.1 The application site is located beyond the northern edge of the village of Wilstone and in the designated Rural Area. The site extends to 0.58 ha of largely level agricultural fields between the residential units at Grange Road, Wilstone and the development at Wilstone Wharf. The applicants are also in control of land to the north of the site up to the boundary of the Grand Union Canal.
- 3.2 The site is accessible from an agricultural field gate located at the south western corner of the site and providing a gap in an existing mature hedgerow demarcating the boundary of the site from Tring Road.
- 3.3 Two storey residential units at Grange Road back onto the southern boundary of the application site and there are a number of single storey dwellings opposite the western site boundary marking the northern extent of the village. To the east of the application site are further agricultural fields in arable use with allotments beyond. The site is physically constrained to the north by the Aylesbury Arm of the Grand Union Canal.

#### 4. BACKGROUND

- 4.1 A planning application for the provision of 28 houses on land to the rear of Grange Road (20/01754/MFA) was refused by the Development Management Committee (DMC) at its meeting of the 17<sup>th</sup> December 2020 for the following reason:

*“The proposed development, by reason of its scale and siting would result in significant harm to the character and appearance of the countryside contrary to Policies CS1, CS2, CS7, CS10 and CS20 of the Core Strategy. Although the Council is not currently able to demonstrate a five year housing land supply, the Council are not satisfied that the benefits of allowing development would clearly outweigh the harm to appearance of the countryside under paragraph 11 of the National Planning Policy Framework (NPPF) given that there would be a clear conflict with the requirements under paragraphs 71, 77 and 78 of the NPPF and given a lack of associated infrastructure within the village of Wilstone”.*

- 4.2 A valid appeal against this decision was lodged with the Council and the Planning Inspectorate on the 1<sup>st</sup> March 2021. The Council is currently awaiting a decision upon this appeal.

- 4.3 No other planning applications for residential development on this site have been refused.

- 4.4 It is prudent, in light of this decision, to now determine the outstanding application (4/00024/19/MFA) for the construction of 15 dwellings at the site and having regard to the views of the committee in relation to this larger scheme.

- 4.5 This scheme has been submitted under Paragraph 71 of the NPPF and comprises entry level housing available at a discounted market rate.

- 4.6 Paragraph 71 of the NPPF states that:

*“Local planning authorities should support the development of entry-level exception sites, suitable for first time buyers (or those looking to rent their first home) unless the need for such homes is already being met within the authority’s area. These sites should be on land which is not already allocated for housing...”*

- 4.7 This planning application seeks to capitalise on the Councils lack of a five year housing land supply and the encouragement towards entry-level homes in the NPPF which has left sites adjacent to existing settlements and not subject to statutory protection (Green Belt and AONB) subject to development pressure.

- 4.8 The NPPF provides that units provided under paragraph 71 of the NPPF should be subject to the affordable housing definitions in Annex 2 thereto. This extends to the provision of Starter homes or Discounted Market homes where the units may be sold at a rate up to 20% below local market value.

- 4.9 The sites are also expected to be *“proportionate in size”* with the footnote suggesting that these should be *“no larger than 1 hectare in size or exceed 5% of the size of the existing settlement”*

- 4.10 The Council has not made any specific arrangements for the delivery of entry-level exception sites within the adopted Core Strategy.

## **5. PROPOSAL**

- 5.1 The current proposals seek planning permission for the construction of 15 units on a smaller site than previously considered at DMC.
- 5.2 The proposals would comprise a mix of 2 (x10) and 3 bed (x5) homes. These detached and semi-detached homes would be accessed from Tring Road. These would be two storeys in height.
- 5.3 All of these homes would be available at a discounted market rate and would constitute affordable housing as per the definition in Annex 2 of the NPPF.

## **6. REPRESENTATIONS**

### Consultation responses

- 6.1 The responses to the further consultations are reproduced in full at Appendix A.
- 6.2 Historical responses to this application are set out in full at Appendix C.
- 6.3 Members should note that the application was initially consulted upon in January 2019. This application was put on hold in August 2019 pending the consideration of an alternative scheme. (20/01754/MFA). Further consultation letters were sent in April and May 2021.

### Neighbour notification/site notice responses

- 6.4 The responses to the further consultations are reproduced in full at Appendix B.
- 6.5 Historical responses to this application are set out in full at Appendix D.
- 6.6 Members should note that the application was initially consulted upon in January 2019. The application was put on hold in August 2019 pending the consideration of an alternative scheme. (20/01754/MFA). Further consultation letters were sent in April and May 2021.

## **7. 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  
CS7 – Rural Area  
CS8 – Sustainable Transport  
CS10 - Quality of Settlement Design  
CS11 - Quality of Neighbourhood Design  
CS12 - Quality of Site Design  
CS13 - Quality of Public Realm

CS17 - New Housing  
CS18 - Mix of Housing  
CS19 - Affordable Housing  
CS20 – Rural Sites for Affordable Homes  
CS23 – Social Infrastructure  
CS26 - Green Infrastructure  
CS27 – Quality of the Historic Environment  
CS29 - Sustainable Design and Construction  
CS30 – Sustainability Offsetting  
CS31 - Water Management  
CS32 - Air, Soil and Water Quality  
CS35 - Infrastructure and Developer Contributions

#### Hertfordshire County Council Waste Core Strategy

Policy 1: Strategy for the Provision for Waste Management Facilities.  
Policy 2: Waste Prevention and Reduction: &  
Policy 12: Sustainable Design, Construction and Demolition.

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

Policy 10 - Optimising the use of urban land  
Policy 12 - Infrastructure Provision and Phasing  
Policy 13 - Planning Conditions and Obligations  
Policy 18 - Size of New Dwellings  
Policy 21 - Density of Residential Development  
Policy 51 - Development and Transport Impacts  
Policy 54 - Highway Design  
Policy 58 - Private Parking Provision  
Policy 99 - Preservation of Trees, Hedgerows and Woodland  
Policy 118 - Important Archaeological Remains.  
Appendix 3 - Layout and Design of Residential Areas

#### Supplementary Planning Guidance / Documents

Affordable Housing (Jan 2013)  
Car Parking Standards (November 2020)  
Energy Efficiency & Conservation (June 2006)  
Water Conservation & Sustainable Drainage (June 2005)

#### Advice Notes and Appraisals

Affordable Housing Advice Note  
Sustainable Development Advice Note (March 2011)

## **8. CONSIDERATIONS**

### Policy and Principle

8.1 The application site is not within a designated protected area (AONB, Green Belt or SSSI) under the National Planning Policy Framework (NPPF) and as the Council is not at present able to demonstrate a 5 year supply of deliverable housing sites, we must consider the proposal against the Framework's presumption in favour of sustainable development as set out in paragraph 11 of the NPPF.

- 8.2 The Council is obligated, under paragraph 11, to grant planning permission unless the policies in the Framework provide a clear reason for refusal or the adverse impact of doing so would out-weigh the benefits when assessed under the framework.
- 8.3 Paragraph 71 of the NPPF would encourage the development of unallocated sites on the edges of settlements to meet a need for starter or entry level homes. This site is not an allocated housing site. This scheme would provide 15 units of this type and tenure.
- 8.4 Small scale housing is encouraged at Wilstone under Policies NP1, CS1, CS2 and CS7 of the Core Strategy. Furthermore, the scale of development is now considered proportionate to the size of the settlement<sup>1</sup>
- 8.5 The key planning objectives in relation to the extension of any settlement would be:
- a) to make an effective use of land in accordance with Policy CS2 of the Core Strategy and Saved Policy 10 of the Dacorum Borough Local Plan 1991-2011,
  - b) to ensure that the proposals would be accessible in accordance with Policies CS8 and CS12 of the Core Strategy,
  - c) to ensure that the proposals would be a high quality design in accordance with Policies CS10, CS11 and CS12 of the Core Strategy
  - d) to safeguard or mitigate for the impact on environmental assets in accordance with Policy CS26, CS27 and CS28 of the Core Strategy and
  - e) to ensure that the infrastructure associated with the development of the site is appropriate in accordance with Policy CS35 of the Core Strategy.

### Affordable Housing

- 8.6 The proposed scheme would contribute to the delivery of housing target as set out in Policy CS17 of the Core Strategy. The provision of discounted market housing is a recognised tenure of affordable housing under Annex 2 of the NPPF and as such the proposal would also support the objectives of Policies CS19 and CS20 of the Core Strategy.
- 8.7 The delivery of homes and affordable homes should be afforded significant weight in this decision, particularly in view of the housing land position.
- 8.8 The Tring Rural Parish Housing Needs Survey was produced by CDA Herts. CDA Herts work with rural communities to explore the issue of affordable housing and identify whether there is a need for affordable local housing and how to meet that need. CDA Herts concluded that there was a need<sup>2</sup> to provide 3 x 1 bed units, 9 x 2 bed units and 1 x 3 bed units. The greatest need was for affordable rental units although there is also a demand for shared ownership tenures recognised through this work. The report does not consider the need for discount market housing, but indicates that a number of local residents would like to own property but find this unaffordable.

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<sup>1</sup> Entry-level exception sites should not be larger than one hectare in size or exceed 5% of the size of the existing settlement.

<sup>2</sup> The gross need is halved in order to provide greater certainty that there will be an unmet future local demand for any projects that come forward (CDA Herts 2018)

- 8.9 The consideration of affordable homes and tenures has evolved significantly since the completion of the CDA Herts report with the introduction of paragraph 71 in the NPPF and broader definitions of affordable tenures being added in Annex 2. There is now an increased emphasis on the delivery of starter homes with the government recently publishing plans for the delivery of “First Homes” setting a clear agenda for the provision of new homes. “First Homes” are the government’s preferred discounted market tenure and moving forward should account for at least 25% of all affordable housing units delivered by developers through planning obligations<sup>3</sup>. This drive for starter homes appears to be irrespective of location or local needs assessment. The proposal seeks to deliver a number of 2 and 3 bed properties to meet the needs of smaller families and those taking their first step on the housing ladder.

### Layout and Design

- 8.10 The scheme is considered to represent a high quality residential scheme in accordance with Chapter 12 of the NPPF, Policies CS10, CS11, CS12 and CS13 of the Core Strategy and Saved Appendix 3 of the Local Plan.
- 8.11 The layout of dwellings in this location seeks to provide a strong residential frontage to Tring Road and with a rear car parking courtyard broken up by soft landscaping. This would strengthen the existing building line to Tring Road and allow residential units to address the wider open space around the perimeter of the site. A second row of houses (plots 12-15) would be located perpendicular to 1-6 Grange Road and would provide natural surveillance of this parking courtyard. This second row of homes would have gardens backing onto neighbouring fields and would allow for the boundary hedging in this location to be strengthened.
- 8.12 The proposed dwellings would be of a traditional design and reflect the local vernacular of residential buildings within the location. They have been amended through the course of this application to reflect the advice of the Conservation and Design team in relation to the larger residential scheme previously considered for this site. As such they are now considered to be appropriate in terms of their design, bulk, scale, height and mass in accordance with Policies CS10, CS11 and CS12 of the Core Strategy. A modest material palette would be used comprising brick and render with tile/slate roofs in accordance with the recommendations of the Conservation and Design section. These are set out in drawing P220 SP 03 Revision C (Proposed Material Plan).
- 8.13 The provision of soft landscaping would break up the extent of hard standing and provide visual relief to the car parking area. There is still a need to consider amendments to the boundary treatment of this area given some concerns with regards to the appearance of fencing in this location and in the interests of security. This could be relieved by the inclusion of walls or hedges to provide a more satisfactory appearance to this area. Such matters should be resolved through a landscaping condition.

### Impact on Heritage Assets

- 8.14 No concerns have been raised by the Conservation and Design team in relation to heritage assets within the vicinity of the application site including the grade II listed Wilstone Bridge, whose setting will not be adversely affected by the proposals in accordance with Policy CS27 of the Core Strategy and the NPPF.

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<sup>3</sup> Subject to the Transitional Arrangement set out in the First Homes Ministerial Statement – 24<sup>th</sup> May 2021. The First Homes policy requirement does not apply to sites with full or outline permissions in place or determined before 28<sup>th</sup> December 2021 or 28<sup>th</sup> March 2022 where pre-application engagement has already occurred.

### Impact on Residential Amenity

- 8.15 The proposed residential units have been arranged in broad accordance with Saved Appendix 3 of the Local Plan 1991-2011 in order to ensure a satisfactory level of residential amenity for future occupants.
- 8.16 The buildings have also been carefully sited to ensure that there is no significant adverse impact upon the residential amenities of neighbouring properties in accordance with Policy CS12 of the Core Strategy and Saved Appendix 3 of the Local Plan 1991-2011.
- 8.17 The main impact of development will be upon the residential amenities of properties in Grange Road. The flank elevation of plot 15 would be located approximately 17m from the main rear elevation of 1-6 Grange Road and northwards of this terrace. Given the juxtaposition of these properties, any impact on daylight and sunlight to them is likely to be negligible. The flank elevation window to this unit would serve a bathroom and would be fitted with obscure glass and a high level opening in the interests of privacy.
- 8.18 The relationship between 90 Tring Road and plots 1, 2 and 15 is also considered to be satisfactory in view of the distance and juxtaposition of properties. No windows would overlook No.90 Tring Road, whilst the physical separation and juxtaposition should ensure that there remains sufficient daylight and sunlight to the main habitable rooms thereto. I do not consider the flank elevations of Plot 1 to be oppressive or particularly intrusive to No.90 Tring Road. No.90 is a bungalow and, whilst it does contain flank windows, these are at ground floor level, and combined with the proposed boundary landscaping, would cause no harm to the residential amenities of the future occupiers of Plots 1 and 2.

### Access, Parking and Movement

- 8.19 The proposals include a new priority T junction with a kerbed entrance leading to an internal access road. The proposed access design is of an acceptable width to enable two vehicles to pass one another and the general designs are in accordance with design criteria as laid out in Roads in Hertfordshire: Highway Design Guide.
- 8.20 The T junctions been designed with appropriate visibility splays for the speed and juxtaposition of Tring Road and is considered to be a safe and convenient access onto Tring Road for the level of use by both future occupants and service providers including refuse and fire vehicles in accordance with Policies CS8 and CS12 of the Core Strategy. Within the site, the highway layout allows sufficient space for the access and circulation of larger vehicles with designated refuse stores provided and secured by condition within acceptable distances for refuse tenders. Each residential unit would be accessible by fire tenders in the event of an emergency. As such the internal layout of the estate is considered to be acceptable in accordance with Policies CS8 and CS12 of the Core Strategy
- 8.21 Vehicular parking will be provided through a combination of on-plot driveway parking and off-road street parking or parking courts. There is a nominal over provision in the parking provision against the Car Parking Standards SPD (2020) of 2 spaces however this is not considered to be sufficient to justify the refusal of the application particularly given the sites rural location and the need for visitor parking. The parking provision is considered to broadly comply with the standards contained within the Car Parking Standards SPD (2020)
- 8.22 The applicants are in agreement to a planning condition to cover the provision of active and passive EV charging points in accordance with the Car Parking Standards SPD (2020)

Active EV charging points should be provided to all houses with additional charging points provided on-street at a general ratio of 1 per dwelling.

- 8.34 The accessibility of both the main village and the canal towpath will be improved through the extension of the existing footpath network in accordance with Policies CS8 and CS12 and in accordance with condition 6 to this approval. Cycle stores will also be provided within the curtilage of each dwelling to encourage the use of alternative means of travel to the private car and secured via planning condition.
- 8.35 The highway authority have no objections to the proposals on either a highways capacity or safety perspective and as such there would be no objection to the proposals under Policies CS8 and CS12 of the Core Strategy and Saved Policies 51 and 54 of the Local Plan 1991-2011 and Car Parking Standards SPD (2020)

### Ecology and Landscaping

- 8.35 An updated Preliminary Ecology Assessment (PEA) and a calculation of net biodiversity gain has been submitted with the application.
- 8.36 The PEA concludes that the arable field itself is of negligible ecological value, whilst the field margins and surrounding hedgerow are not currently managed to provide any notable benefits for wildlife. The most significant hedgerows are those to the Tring Road frontage and alongside the Grand Union Canal with the hedgerow at the frontage of the site meeting the 'important' threshold within the Hedgerow Regulations 1997.
- 8.37 The proposed development seeks to retain all of the existing hedgerows around the site with the exception of a narrow area to be removed to facilitate access to the site through a T junction. This loss is off-set by supplementary planting both to the existing hedgerow at Tring Road and through additional soft landscaping along the remaining boundaries to the site. The PEA also concludes that the proposed development is unlikely to result in any significant impacts on protected species including, amphibians, invertebrates, plants and badgers. This is due to the fact that these species are likely to be absent from the footprint of the proposed development and the immediate surrounding areas. The proposals would not result in the removal of any trees.
- 8.39 The PEA also identifies that by following the recommendations of the Ecologist and by providing additional landscaping to the site, there is likely to be a significant increase in the net biodiversity value of the site, far exceeding the recommendations in the Environment Bill<sup>4</sup>.
- 8.40 The improvement of existing landscape features through native planting together with the provision and sensitive management of field margins are considered to have potential to provide biodiversity gains in accordance with Policy CS26 of the Core Strategy.
- 8.41 Further details of the soft landscaping and ecological improvement measures should be conditioned and should build upon those plans already provided and recommendations in the PEA. This should also cover the provision of a detailed lighting scheme designed to target and minimise light spill beyond the built up areas of the site.

### Sustainable Construction

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<sup>4</sup> The Environment Bill is anticipated to introduce a mandatory requirement for all developments to result in at least a 10% increase in biodiversity value of the site. This will be calculated using the published Biodiversity Matrix. The Environment Bill still needs to be considered by the House of Lords and gain Royal Assent.



- 8.42 The application does not set out specifically how the requirements of Policies CS28 and CS29 are to be addressed by this submission. Sustainable building design and construction are an essential part of the Council's response to the challenges of climate change, natural resource depletion, habitat loss and wider environmental and social issues.
- 8.43 Whilst we would anticipate that buildings will be constructed to achieve or exceed the Building Regulation requirements for thermal efficiency, energy consumption and water consumption and would note the inclusion of landscaping, biodiversity measures and EV charging points. It is recommended that further details in relation to sustainable design and construction be secured by a planning condition.

#### Drainage and Flooding

- 8.44 The methodology for drainage of the site has been considered in some detail as a result of the application for a larger development on the site (20/01754/MFA) and in discussions with the Lead Local Flood Authority (LLFA). The drainage and flood risk assessment has been updated accordingly and builds upon the principles agreed with the Lead Local Flood Authority.
- 8.45 It is proposed to discharge run-off from the site to a ditch located at the northern end of the agricultural field at a controlled rate. The run-off will be directed into a deepened sub-base to the proposed roads, parking area and driveways where it may be attenuated and treated prior to discharge via a flow control chamber to the drainage ditch. Storage crates will be utilised within the parking areas and under permeable paved areas.
- 8.46 There are no objections to this approach from the Lead Local Flood Authority, subject to the submission of final details, which will be secured through conditions.
- 8.47 The LLFA have also confirmed that they do not consider the development to be at significant risk of flooding in view of these measures and that it should not increase the flood risk either on site or elsewhere in accordance with Policies CS31 and CS32 of the Core Strategy.

#### Developer Contributions and Infrastructure

- 8.48 All new developments are expected to contribute towards the costs of on site, local and strategic infrastructure in accordance with Policy CS35 of the Core Strategy. The Council seeks to secure such infrastructure contributions through a combination of CIL and through an appropriate use of planning obligations under Section 106 of the Town and Country Planning Act 1990 (As Amended)
- 8.49 The Council has an adopted Community Infrastructure Levy (CIL) under which financial contributions are secured from all new residential development towards on site, local and strategic infrastructure works necessary to support development. The site would be located within Zone 2 (Elsewhere) wherein a charge of £150 per square metre of new residential development (as increased by indexation) will be levied in accordance with the CIL Charging Schedule. The Council's adopted Regulation 123 list sets out how such sums will be spent on infrastructure. Despite being classified as Affordable Housing under the NPPF there proposals would not appear to be exempt from the payment of CIL.
- 8.50 There are no objections to the scheme from associated infrastructure providers including the County Council and utility providers. Despite resident's concerns with the sewerage infrastructure for the village, the provider has indicated that there is sufficient capacity or that capacity may be increased to accommodate the development.

- 8.51 A planning obligation under Section 106 of the Town and Country Planning Act 1990 (As Amended) will be required to ensure that the type and tenure of affordable housing may be secured in accordance with Policies CS19, CS20 and CS35 of the Core Strategy.
- 8.52 In addition, it will be necessary to secure improvements to bus stop in the locality in accordance with advice from the Highway Authority and to ensure that adequate provision is made to access the site by alternative means of transport to the private car. A contribution of £13,125 (index linked) is required to improve local bus stops as set out in the advice of the highway authority. These obligations are considered to be reasonable and necessary in accordance with Regulations 123 and 124 of the CIL Regulations and as a result of our consideration of the submitted Transport Assessment and the requirements of Policy CS8 of the Core Strategy.

### Planning Balance

- 8.52 The only negative aspects to the scheme under consideration are the loss of open space and arable land at the edge of the village of Wilstone. According to the Agricultural Land Classification maps from Natural England, this land Grade 3, moderate quality, agricultural land. The subdivision of Grade 3 land no longer appears to be mapped by Natural England. Low quality agricultural land (Grade 4) is identified elsewhere at the edge of the village and beyond this towards Puttenham. This loss of open space is considered to result in slight environmental harm given its limited value for farming purposes and limited ecological value.
- 8.53 The scheme is considered to be a good quality and sustainable residential scheme providing a logical extension to the village of Wilstone and supporting its natural growth. The proposals will result in no significant harm to the character of the village and its surroundings.
- 8.54 The proposed development would provide affordable housing under paragraph 71 of the NPPF. This would be located in close proximity to the rural settlement of Wilstone where it can enhance and maintain the viability of the village in accordance with paragraph 78 thereto.
- 8.55 Some economic benefits should be experience in both the short and long term including the provision of construction jobs whilst the scheme is implemented and as a result of increased local expenditure within the village. Future residents of the scheme are likely to support local facilities and services. These facilities include the community shop, farm shops, public house and village hall.
- 8.56 The scheme is also considered to deliver social and environmental benefits through the delivery of improved access to the canal and surrounding countryside. It is possible to deliver improvements in the biodiversity value of the site, through the creation of new habitat and through careful landscaping and site management. These environmental improvements would clearly out-weigh the loss of the poor quality arable field in this location.

### Other Matters

#### *Farm Access*

- 8.57 Farmland to the north and east of the site would still be accessible from the access road to the site This access road could easily be extended to facilitate additional development should the need arise and as such I am satisfied that the proposals would not unduly

prejudice the optimisation of other land in accordance with Saved Policy 10 of the Local Plan 1991-2011.

### Noise

- 8.58 The proposed development is not subject to any objections from the Environmental Health team despite the location of a scaffold yard to the north and its potential as a source of noise nuisance. This yard is approximately 130m to the north of the site and its redevelopment for residential purposes is currently subject to consideration under application (21/00854/FUL)
- 8.59 I am satisfied that the residents of the proposed units are not likely to experience excessive noise or disturbance from this business such that it would lead to a substandard level of residential amenity.

## 9 CONCLUSION

- 9.1 The proposed development will deliver significant planning benefits in terms of the delivery of affordable housing and this weighs significantly in favour of the grant of planning permission. The proposed development is well designed and responds positively to its surrounding environment. Accordingly the proposals are considered to meet with the aims and objectives of the NPPF and must be granted planning permission in accordance with paragraphs 11 and 71 of thereto.

## 10 RECOMMENDATION

- 10.1 a) 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:
- b) That the following Heads of Terms for the planning obligation are agreed:
- The delivery of affordable housing in the form of discounted market housing on the site,
  - A contribution of £13,125 towards the upgrade of existing bus stops serving the development.

### Condition(s) and Reason(s):

Please note that additional planning conditions will be required to meet with the requirements of the Lead Local Flood Authority.

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:**

### Plans

**P.220.LP.01 Revision C (Location Plan)**  
**P.220.SP.01 Revision F (Proposed Site Plan)**

P.220.SP.02 Revision C (Proposed Surface Materials)  
P.220.SP.03 Revision C (Material Plan)  
P.220.754.01 Revision A (Plots 1, 2, 7 and 8)  
P.220.754.02 Revision A (Plots 9 and 10)  
P.220.851.01 Revision B (Plots 3, 4, 14 and 15)  
P.220.974.01 Revision B (Plots 5, 6, 12 and 13)  
P.220.974.02 Revision A (Plot 11)

#### Documents

Flood Risk and Drainage Statement by Glanville Ref: 022\_8180891\_AP\_FRA\_&\_Drainage Statement  
Flooding and Drainage Technical Note, Issue 2, dated 12 May 2021, Ref. 024\_8180891\_CS\_Technical Note, prepared by Glanville  
Indicative Surface Water Drainage Strategy, Drawing No. 8180891\_SK11, Rev. P2, dated 11/05/2021, prepared by Glanville  
Heritage Assessment (November 2018) by Albion Archaeology  
Preliminary Ecological Appraisal (March 2021) by Windrush Ecology Limited  
Transport Statement (Update) by Glanville Ref: 021\_8180891\_AD\_Transport\_Statement, Issue 6: 26<sup>th</sup> March 2021.

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

#### Design

- 3. No development of the superstructure shall take place until samples of the materials to be used on the external surfaces of the development hereby approved have been submitted to and approved in writing by the local planning authority. Development shall be carried out in accordance with the approved details**

Reason: To ensure a satisfactory appearance to the development in accordance with Policies CS11 and CS12 of the Core Strategy.

- 4. The window at first floor level and within the south western elevation of plot 15 shall be permanently fitted with obscure glazing.**

Reason: In the interests of privacy of neighbouring properties.

#### Access and Highway Conditions

- 5. The development hereby approved, shall not be occupied, until the means of access, parking and circulation areas have been provided fully in accordance with drawings P.220.SP.01F and 8180891/6105 (within Transport Statement (Update) Ref 021\_08180891\_AD\_Transport Statement, Issue 6 (26<sup>th</sup> March 2021))**

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.

- 6. The development, hereby approved, shall not be occupied until full details of a footpath link through the application site and linking Grange Road with the Grand Union Canal towpath have been submitted to and approved in writing. The development shall not be fully occupied until the footpath has been completed in accordance with the approved details.**

Reason: To ensure that adequate provisions are made to access the site by alternative means to the car in accordance with Policies CS8 and CS12 of the Core Strategy and Car Parking Standards SPD

7. **The development, hereby approved, shall not be occupied until full details of the Electric Vehicle Charging Points including the type of charger, power supply and a scheme for the maintenance and management of charging points has been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details prior to occupation and shall thereafter be retained.**

Reason: In the interests of access and highways safety in accordance with Policies CS8 and CS12 of the Core Strategy and the Car Parking Standards SPD.

8. **Prior to the first occupation of the development hereby permitted visibility splays shall be provided in full accordance with the details indicated on the approved plan number 8180891/6105. The splays shall thereafter be maintained at all times free from any obstruction between 600mm and 2m above the level of the adjacent highway carriageway.**

Reason: 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).

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.

#### Landscaping Conditions

10. **No construction of the superstructure shall take place until full details of both hard and soft landscape works has been submitted to and approved in writing by the Local Planning Authority.**

**These details shall include:**

- means of enclosure, including the materials and/or hedging plants to be used for any enclosures, together with the location of any hedgehog gates;
- soft landscape works including a planting scheme with the number, size, species and position of trees, plants and shrubs;
- tree protection plans
- finished levels and contours in relation to existing site levels, eaves and ridge heights of neighbouring properties;
- the provision of refuse stores and enclosures;
- any exterior lighting works and
- the siting and design of any bird boxes, bat boxes and other habitat creation.
- Mitigation and Enhancement measures as set out in Section 5 (Recommendations) of the Preliminary Ecological Appraisal by Windrush Ecology dated March 2021.

The planting must be carried out within one planting season of completing the development.

Any tree or shrub which forms part of the approved landscaping scheme which within a period of 5 years from planting fails to become established, becomes seriously damaged or diseased, dies or for any reason is removed shall be replaced in the next planting season by a tree or shrub of a similar 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.

### Contamination

11. No development approved by this permission shall be commenced prior to the submission to, and agreement of the Local Planning Authority of a written preliminary environmental risk assessment (Phase I) report containing a Conceptual Site Model that indicates sources, pathways and receptors. It should identify the current and past land uses of this site (and adjacent sites) with view to determining the presence of contamination likely to be harmful to human health and the built and natural environment.

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

12. If the Local Planning Authority is of the opinion that the report which discharges condition 11, above, indicates a reasonable likelihood of harmful contamination then no development approved by this permission shall be commenced until a Site Investigation (Phase II environmental risk assessment) report has been submitted to and approved by the Local Planning Authority which includes:

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

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

13. **No development approved by this permission (other than that necessary for the discharge of this condition) shall be commenced until a Remediation Method Statement report; if required as a result of 12, above; has been submitted to and approved by the Local Planning Authority.**

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

14. **This site shall not be occupied, or brought into use, until:**

- (i) **All works which form part of the Remediation Method Statement report pursuant to the discharge of condition 13 above have been fully completed and if required a formal agreement is submitted that commits to ongoing monitoring and/or maintenance of the remediation scheme.**
- (ii) **A Remediation Verification Report confirming that the site is suitable for use has been submitted to, and agreed by, the Local Planning Authority.**

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

#### Drainage

15. **The development permitted by this planning permission shall be carried out in accordance with the Flooding and Drainage Technical Note, Issue 2, dated 12 May 2021, Ref. 024\_8180891\_CS\_Technical Note, prepared by Glanville and the Indicative Surface Water Drainage Strategy, Drawing No. 8180891\_SK11, Rev. P2, dated 11/05/2021, prepared by Glanville and the following mitigation measures:**

1. **Limiting the surface water run-off rates to a maximum of 2l/s for all rainfall events up to and including the 1 in 100 year + climate change event with discharge into the ditch on site before ultimate discharge into the Grand Union Canal.**

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. **Implement drainage strategy utilising lined permeable paving with sub-base, attenuation crates and flow control with piped connection into the ditch.**

Reason: To reduce the risk of flooding to the proposed development and future occupants in accordance with Policies CS31 and CS32 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 the Flooding and Drainage Technical Note, Issue 2, dated 12 May 2021, Ref. 024\_8180891\_CS\_Technical Note, prepared by Glanville and the Indicative Surface Water Drainage Strategy, Drawing No. 8180891\_SK11, Rev. P2, dated 11/05/2021. The scheme shall also include:**

1. **As the site is impacted by groundwater, a location plan showing groundwater monitoring locations and associated results, an assessment of this flood risk and its mitigation. Details on how the site drainage features will be secured against groundwater should also be provided.**

- 2. Provisions for maintenance of the ditch to ensure suitability for conveyance of the site discharge to the canal.**
- 3. Provision of a detailed catchment assessment of the ditches / potential ordinary watercourses, ensuring effective management of this risk.**
- 4. Full CCTV survey and condition assessment of the connection between the ditch and the Grand Union Canal, along with any maintenance or remedial works.**
- 5. Detailed engineered drawings of the proposed SuDS features including their location, size, volume, depth and any inlet and outlet features including any connecting pipe runs and all corresponding calculations/modelling to ensure the scheme caters for all rainfall events up to and including the 1 in 100 year + 40% allowance for climate change event, with a supporting detailed contributing area plan.**
- 6. Demonstrate appropriate SuDS management and treatment for the entire site including the access road.**
- 7. Provision of half drain down times within 24 hours.**
- 8. Exceedance plan for events greater than the 1 in 100 year plus 40% for climate change event.**

Reason: To prevent flooding by ensuring the satisfactory storage of and disposal of surface water from the site in accordance with Policies CS31 and CS32 of the Core Strategy

- 17. Upon completion of the drainage works for the site in accordance with the timing / phasing arrangements, the following must be submitted to and approved in writing by the Local Planning Authority:**

- 1. Provision of a verification report (appended with substantiating evidence demonstrating the approved construction details and specifications have been implemented in accordance with the surface water drainage scheme). The verification report shall include photographs of excavations and soil profiles/horizons, installation of any surface water structure (during construction and final make up) and the control mechanism.**
- 2. Provision of a complete set of as built drawings for site drainage.**
- 3. A management and maintenance plan for the SuDS features and drainage network.**
- 4. Arrangements for adoption and any other measures to secure the operation of the scheme throughout its lifetime.**

Reason: To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site in accordance with Policies CS31 and CS32 of the Core Strategy.

- 18. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 1995 (As Amended) or any revisions thereto there shall be no development falling within the following schedules to the**



**specified units without the express planning permission of the local planning authority**

**Schedule 2 Part 1 Class A – Plots 1 and 15.**

**Schedule 2 Part 1 Classes AA, B, C and E to all plots.**

Reason: In the interests of the visual amenity of the area and residential amenity in accordance with Policy CS10, CS11 and CS12 of the Core Strategy.

## **HIGHWAY INFORMATIVES:**

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) 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)

AN) Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence.

AN) Obstruction of public highway land: It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence.

AN) Road Deposits: It is an offence under section 148 of the Highways Act 1980 to deposit mud or other debris on the public highway, and section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure that all vehicles leaving the site during construction of the development are in a condition such as not to emit dust or deposit mud, slurry or other debris on the highway.

AN) Construction standards for 278 works within the highway:

The applicant is advised that in order to comply with this permission it will be necessary for the developer of the site to enter into an agreement with Hertfordshire County Council as Highway Authority under Section 278 of the Highways Act 1980 to ensure the satisfactory completion of the access and associated road improvements. The construction of such works must be undertaken to the satisfaction and specification of the Highway Authority, and by a contractor who is authorised to work in the public highway. Before works commence the applicant will need to apply to the Highway Authority to obtain their permission and requirements.

## **CONTAMINATION**

Any contamination, other than that report encountered during the development of this site shall be brought to the attention of the Local Planning Authority as soon as practically possible; a scheme to render this contamination harmless shall be submitted to and agreed by, the Local Planning

Authority and subsequently fully implemented prior to the occupation of this site. Works shall be temporarily suspended, unless otherwise agreed in writing during this process because the safe development and secure occupancy of the site lies with the developer.

## APPENDIX A: CONSULTEE RESPONSES

Consultee	Comments
Tring Rural Parish Council	<p>Tring Rural Parish Council object to this major development in the rural area.</p> <p>The NPPF makes it clear that development must not compromise the protection given to areas or assets of particular importance in the NPPF. We believe the proposal does compromise the protection afforded and will have a harmful and detrimental impact on the character of the area.</p> <p>Central to our objection for this application is the definition of Local Housing Need, policy CS20 and the Settlement Hierarchy.</p> <p>CS20: The delivery of housing in rural locations to address an identified local need, a policy that affords significant weight in the decision to refuse or grant planning permission.</p> <p>In the 1980's the Rural Exception Policy was introduced to the UK. This policy allowed that if a need for local affordable housing was established, then under certain and limited circumstances, an exception to planning policy would be permitted. Rural exception schemes contain only affordable homes which must remain available in perpetuity to local people who are unable to afford open market rent or purchase. They help to sustain small villages to ensure a balanced community.</p> <p>This 15-unit scheme proposal does not accord to local planning policy CS20. Any homes built on this site are to be sold at 80% of open market prices and offered to purchasers across the borough. Homes that will not be affordable to parishioners, on local salaries in housing need.</p> <p>In the background section of the case officer's report, for a larger application on the same land (20/01754/MFA - refused 17 December 2020) the officer states that the provision of an Entry Level Exception Scheme ELES as provided in this re-submitted application would be in clear conflict with paragraph 77 of the NPPF to meet the requirement for rural housing to address local needs and would fail to meet those requirements under Policy CS20.</p> <p>We concur with the case officer that this and the related application under appeal, are wholly inappropriate for Wilstone and the open countryside.</p> <p>The case officers' report goes on to clarify:</p>

“The Tring Rural Parish Housing Needs Assessment clearly identifies that the needs of the village are for smaller units of housing for social rent in line with more general affordable housing requirements under Policy CS19 of the Core Strategy. The Local Housing Needs assessment goes further and suggest that discounted market homes (as provided under 4/00024/19/MFA) would be unaffordable for local residents and would do little to address local need.”

We are astonished therefore to see this application resubmitted and dismayed that significant national and local policies are being seemingly disregarded by the applicant and planning officers.

The Framework clearly directs that planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

Whilst we support appropriate development in the parish, the community do not want to see any development at all of this site or its surrounds. We are of the firm view that the natural qualities combined with adjoining fields provide an attractive, open prominent feature of the landscape which must be protected.

This site lies outside of the defined settlement of Wilstone. It is undeveloped land with existing hedgerows and trees that form part of the visual gateway into the village.

We believe that development here would have a significant adverse effect upon the landscape character of its wider surroundings. It would also have a prominent harmful visual impact, particularly when viewed from The Grade 2 listed Bridge on Tring Road, an important and regularly used approach into the village.

#### Settlement Hierarchy

Further, the Settlement Hierarchy is another material consideration when determining planning applications. It takes into account current population, historic role, level of services, and the constraints and opportunities of each place in the Borough, to determine the main principles that are used to guide development in each location.

Decisions on the scale and location of development will be made in accordance with the settlement hierarchy.

Dacorum Core Strategy 2016 and New Draft Local Plan 2020 – 2038 both designate Wilstone as one of the least sustainable settlements in the borough. Wilstone is listed as a ‘Small Village Within the Rural Area’ in the Settlement Hierarchy and an Area of Development Restraint.

#### Core Strategy CS7

The Rural area is protected in Dacorum’s Core Strategy by Policy CS7. The policy clarifies that, “These are the least sustainable areas

of the borough, where significant environmental constraints apply. These include areas of high landscape quality, such as the Chilterns Area of Outstanding Natural Beauty, and the countryside between settlements. This needs to be protected to ensure its rural character is retained and settlements keep their separate identities.”

Crucially, in the knowledge that applications 4/00024/19/MFA, 20/00754/MFA and 21/00854/FUL are all linked, either by the same landowner and/or the same agent, the community are also understandably concerned that these 3 separate applications, in clear conflict of materially important planning considerations, which may jointly or severally have significant implications for the village.

In summary:

We consider the submission must be refused because it is contrary to the NPPF for development in rural or protected areas and Core Strategy policies; Settlement Hierarchy, CS1, CS2, CS7 and CS20.

Additional Comments

Further to recent amendments to this planning application Tring Rural Parish Council wish to make it clear that we maintain our position and continue to object to any proposed development on this land because of the harmful and detrimental impact it will have on the rural surrounds.

These homes do not accord to CS7 or CS20 they are not for 'Local Needs'. Clearly the housing units will not be a Rural Exception Scheme (RES) in the traditional sense, which offers affordable homes for local people in perpetuity, but an Entry Level Exception Site (ELES - NPPF 2018), aimed at meeting 'affordable' housing need across the Borough. These 'affordable' homes will be sold at 80% of the open market prices.

We struggle to understand the pertinence of the Design and Access Statement, Executive Summary Local Context - Wilstone, in Italics below;

- "...That the population has aged significantly over the last 15 years..... it is likely that without further development, the village will see population decline and rapid ageing in the future..."

Our community consider Wilstone a well-balanced and inclusive settlement, which comprises elderly residents but equally, middle-aged couples, young families and single people. The school buses from Wilstone to Long Marston and Tring Schools bear witness to our vibrant society. Litchfield's report shows that 35% of our population are indeed over 65 but that 41% of households are in younger age brackets and have dependent or non-dependent children.

Our parish has a healthy and sustainable balance of residents and this morphs naturally as our elderly pass on, families with children move up the housing ladder freeing up smaller homes in the parish for those in a position to purchase or rent.

- "Attracting (First Time Buyer) households is also likely to support the local shop and pub as well as schools and facilities in other nearby villages and towns".

The thriving community shop is a leading example of successful and balanced communal involvement. Since 2012 it has been managed and run by volunteers, staffed by working and retired members of the community and many younger teenage members too. Efforts by parishioners have recently resulted in successfully negotiating a long-term shop lease with the new owners and raising funds to extend and refurbish the premises.

The Half Moon pub, is very well patronised and supported enthusiastically by locals and visitors.

- "Supply of First-time Buyer Housing. Figure 5.1 Dwelling Stock."

Litchfield's report clearly shows that our community already has a balanced supply of housing sizes in the settlement, advising 35% detached homes and 66% of smaller semi-detached, terraced and apartments. There is a current planning application for 6 social rented homes in the settlement.

Evidence from CDA for Herts Housing Needs Survey 2018  
In 2018, Tring Rural Parish Council and Community Development Agency for Herts conducted a Housing Needs Survey in the parish, with a view to establishing whether there was a need for affordable homes, available in perpetuity and provided for people with a strong, provable local connection. The survey did establish such a need but as can be seen above, we already have suitable properties available, including Social Rent, Open Market rent, Shared Ownership (Lendon Grove) and Open Market for sale. The Survey was not conducted to support provision of 'other' borough wide needs.

"Information available from Dacorum Borough Council indicates that there are 49 social housing units (general needs) provided within the parish of Tring Rural as follows:

- 4 x 1 bed flats
- 5 x 2 bed houses
- 38 x 3 bed properties
- 2 x 4 bed homes

Additionally, there are nine sheltered housing units in Tring Rural;

- 5 x one bed bungalows
- 2 x 2 bed flats
- 1 x 2 bed house
- 1 x 2 bed bungalow"

This clearly demonstrates a healthy local supply of affordable rented homes. Dacorum BC also have a Local Lettings Policy that prioritises allocation to rural applicants with a local connection:

Dacorum Borough Council has robust policies in place to preserve

	<p>their distinct rural settlements and part of their social objectives are to protect and enhance the natural, built and historic environment, supporting effective use of land and improve biodiversity.</p> <p>The Core Strategy (Adopted 2013), also lists Wilstone as an Area of Development Restraint</p> <p>- "being one of the least sustainable areas of the borough, where significant environmental constraints apply"</p> <p>These include areas of high landscape quality, such as the Chilterns Area of Outstanding Natural Beauty, and the countryside between settlements. This needs to be protected to ensure its rural character is retained and settlements keep their separate identities.</p> <p>- Dacorum Core Strategy 2013 POLICY CS20: Rural Sites for Affordable Homes</p> <p>"Small-scale schemes for local affordable homes will be promoted in and adjoining selected small villages in the countryside (see Policies CS6 and CS7), and exceptionally elsewhere with the support of the local Parish Council. Development will only be permitted if: (a) it meets an identified local need for affordable housing; (b) the housing is for people who have a strong local connection with the village or parish through work, residence or family; and (c) the scheme is of a scale and design that respects the character, setting and form of the village and surrounding countryside. Any site on the edge of a village must represent a logical extension to it."</p> <p>We are fortunate and privileged to live in Wilstone, situated in The Boarscroft Vale, and to ensure the healthy balance continues, we are always willing to embrace appropriate, modest, well-planned development and to welcome new members to the community. As can be seen, we already have a good supply of social rented units and affordable properties suitable for first time buyers. Development of this site is not justified by local circumstances and will have a harmful and detrimental impact on the village. TRPC do not consider that the proposed development is appropriate in Wilstone, it does not meet a proven 'local' need and does not have general community support for the proposed ELES development.</p>
<p>Hertfordshire Constabulary</p>	<p>Layout</p> <p>Whilst a number of allocated parking spaces are close to the houses, from a security perspective we would normally ask that car spaces are situated at the front of the property to enhance surveillance. In this instance I note that there is some surveillance from houses 12-15.</p> <p>Any ground level exterior windows to have been certificated to BS PAS 24:2016.</p> <p>All exterior doors to have been certificated to BS PAS 24:2016, or LPS 1175 SR 2,</p> <p>Lighting - timer, (motion sensor lighting has proven to be problematic)</p>

	<p>no bollard lighting.</p> <p>Ensure that each dwelling boundary is secure at the side and rear.</p>
Hertfordshire County Council – Ecology Unit	Comments awaited
Hertfordshire County Council – Growth and Infrastructure Unit	<p>Hertfordshire County Council's Growth &amp; Infrastructure Unit do not have any comments to make in relation to financial contributions required by the Toolkit, as this development is situated within your CIL zone and does not fall within any of the CIL Reg123 exclusions.</p> <p>Notwithstanding this, we reserve the right to seek Community Infrastructure Levy contributions towards the provision of infrastructure as outlined in your R123 List through the appropriate channels. We therefore have no further comment on behalf of these services, although you may be contacted separately from our Highways Department. Please note this does not cover the provision of fire hydrants and we may contact you separately regarding a specific and demonstrated need in respect of that provision</p>
Hertfordshire Highways	<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><b>Conditions</b></p> <p><u>Construction Traffic Management Plan</u></p> <p>No development shall commence until a Construction Management Plan (or Construction Method Statement) 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.</p> <p>The Construction Management Plan / Statement shall include details of:</p> <ol style="list-style-type: none"> <li>a. Construction vehicle numbers, type, routing;</li> <li>b. Access arrangements to the site;</li> <li>c. Traffic management requirements</li> <li>d. Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas);</li> <li>e. Siting and details of wheel washing facilities;</li> <li>f. Cleaning of site entrances, site tracks and the adjacent public highway;</li> <li>g. Timing of construction activities (including delivery times and removal of waste) and to avoid school pick up/drop off times;</li> <li>h. Provision of sufficient on-site parking prior to commencement of construction activities;</li> <li>i. Post construction restoration/reinstatement of the working areas and temporary access to the public highway;</li> <li>j. where works cannot be contained wholly within the site a plan should be submitted showing the site layout on the highway including extent of hoarding, pedestrian routes and remaining road width for</li> </ol>

vehicle movements.

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).

#### New Access

Prior to the first occupation / use of the development hereby permitted the vehicular access shall be provided and thereafter retained at the position shown on the approved plan drawing number P.220.SP.01 in accordance with the highway specification 8180891/6105 attached.

Prior to the first use of the development hereby permitted arrangement shall be made for surface water to be intercepted and disposed of separately so that it does not discharge onto the highway carriageway.

Reason: To ensure satisfactory access into the site and avoid the carriage of extraneous material or surface water onto the highway in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

#### Visibility

Prior to the first occupation / use of the development hereby permitted a visibility splay shall be provided in full accordance with the details indicated on the approved plan number 8180891/6105. The splay shall thereafter be maintained at all times free from any obstruction between 600mm and 2m above the level of the adjacent highway carriageway.

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).

#### Standard Highway Condition

No development shall commence until plans have been submitted to and approved in writing by the Local Planning Authority to illustrate the roads, footways, cycleways, foul and surface water drainage. All construction works shall be carried out in accordance with the approved plans.

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).

#### Pedestrian Route

Prior to first occupation of the development hereby permitted a footway shall be provided in full accordance with the details indicated on the approved plan number 8180891/6104.



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).

#### Informatives

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

AN) Extent of Highway: Information on obtaining the extent of public highway around the site can be obtained from the HCC website:

AN) Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence.

AN) Obstruction of public highway land: It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence.

AN) Road Deposits: It is an offence under section 148 of the Highways Act 1980 to deposit mud or other debris on the public highway, and section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure that all vehicles leaving the site during construction of the development are in a condition such as not to emit dust or deposit mud, slurry or other debris on the highway.

AN) Construction standards for new/amended vehicle access: Where works are required within the public highway to facilitate the new or amended vehicular access, the Highway Authority require the construction of such works to be undertaken to their satisfaction and specification, and by a contractor who is authorised to work in the public highway. If any of the works associated with the construction of the access affects or requires the removal and/or the relocation of any equipment, apparatus or structures (e.g. street name plates, bus stop signs or shelters, statutory authority equipment etc.) the applicant will be required to bear the cost of such removal or alteration.

Before works commence the applicant will need to apply to the Highway Authority to obtain their permission, requirements and for the work to be carried out on the applicant's behalf.

AN) Construction standards for 278 works within the highway:  
The applicant is advised that in order to comply with this permission it will be necessary for the developer of the site to enter into an agreement with Hertfordshire County Council as Highway Authority under Section 278 of the Highways Act 1980 to ensure the satisfactory completion of the access and associated road improvements. The construction of such works must be undertaken to the satisfaction and specification of the Highway Authority, and by a contractor who is authorised to work in the public highway. Before works commence the applicant will need to apply to the Highway Authority to obtain their permission and requirements.

#### Section 278 Agreement

A Section 278 Agreement will be required for changes to the public highway, including the site access and footway provision.

#### Section 106 Agreement / Planning Contributions

HCC's Planning Obligation toolkit (January 2008) which requires the following fees per dwelling type to be SPONS index linked to July 2006 from the point at time at which the figure is calculated.

Out of town centre: £625 per 1 bedroom dwelling, £750 per 2-bedroom dwelling, £1125 per 3-bedroom dwelling and £1500 per 4+ bedroom dwelling.

Assuming 10 x 2-bedroom dwellings and 5 x 3-bedroom dwellings, the total contribution would be £13,125 – SPONS indexed linked to July 2006.

#### Description of the Proposal

The original development proposals included the provision of 15 dwellings, comprising of nine 2-bed houses and six 3-bed houses. The revised proposed scheme comprises of ten 2-bed houses and five 3-bed houses.

#### History

Pre-Application advice was sought in 2015 for a new development comprising 8 dwellings. Amendments to this application were made on 31 March 2021.

An updated Transport Statement and plans were submitted to support these amendments.

#### Site Description

The site is located to the northern extent of Wilstone village and is greenfield. The site is bound to the northwest by Tring Road, to the southwest by a residential property and by farmland to the north and east. Tring Road is an unclassified local access road subject to a 60mph speed limit in the vicinity of the site; however, the speed reduces to 30mph south of the proposed access.

#### Analysis

A Design and Access Statement and Transport Statement have been provided by the applicant in support of the proposed development.

A Design and Access Statement is a requirement of all proposed developments which may have an impact on the highway, in line with the requirements set out in Hertfordshire County Council's Roads in Hertfordshire: Highways Design Guide 3rd Edition. A DAS has been submitted, this is acceptable.

For a proposed development of this size, a Transport Statement is required per the guidance set out in Hertfordshire County Council's Roads in Hertfordshire: Highways Design Guide 3rd Edition. The applicant has provided an updated Transport Statement in support of amended plans and this is acceptable.

#### Policy Review

The Transport Statement states that the report follows guidance contained in Guidance on Transport Assessment (March 2007) published by the Department for Transport, as well as advice from Central Government in the form of the National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance on Transport Assessments and Statements.

A full national and local policy has been provided by the applicant within the updated Transport Statement. Reviewed policy includes:

- National Planning Practice Guidance (NPPG);
- National Planning Policy Framework (NPPF);
- Manual for Streets (2007);
- Hertfordshire County Council Local Transport Plan 4 (LTP4);
- HCC Active Travel Strategy (April 2013);
- HCC Rail and Bus Strategy; and,
- DBC's Parking Standards Supplementary Planning Document (November 2020)

#### Trip Generation and Distribution

##### Trip Generation

Trip generation analysis is presented within the Transport Statement.

##### Proposed Trip Generation

The applicant used the TRICS database to determine the number of trips the development is likely to generate. For the residential trip rate calculation, the applicant used the following parameters:

- 03- Residential
- Houses Privately Owned
- 16-29 units
- Edge of Town

The parameters used for the TRICS interrogation are considered acceptable. The proposed total person trip rates generated by the TRICS interrogation for the residential land use were summarised in

the Transport Statement, as were the vehicle trip rates. The vehicle trip generation was determined to be:

- AM Peak: 1 arrival, 7 departures for a total of 8 two-way trips
- PM Peak: 6 arrivals, 3 departures for a total of 9 two-way trips
- Daily: 35 arrivals, 34 departures for a total of 69 two-way trips

#### Trip Distribution

No trip distribution exercise was undertaken as part of the Transport Statement. This is acceptable due to the low number of trips associated with the development.

#### Impact on the Highway Network

##### Junction Assessment

No junction assessment exercise was undertaken as part of the Transport Statement. This is acceptable due to the low number of trips associated with the development.

##### Delivery, Servicing and Refuse Vehicles

The Transport Statement states that the proposed internal road layout provides adequate turning space to allow a 10m refuse vehicle to access and depart from the site in forward gear.

A swept path analysis is included within Appendix G and illustrates the movement of a 10.2m refuse vehicle within the internal road network.

However, additional swept path analysis is required to demonstrate that a car can safely pass the refuse vehicle within the network.

##### Road Safety

Collision analysis has been provided by the applicant. A review of collision data, from 1 December 2014 to 30 November 2019 has been undertaken for the area from Tring Road (from which the proposed development would be accessed), its junctions with Wingrave Road and Lower Icknield Way (B489), the B489 junction with Little Tring Road (where the B489 bends to the north) and the B489 /Wingrave Road / Tringford Road roundabout.

While HCC is satisfied that there does not appear to be any concerning trends in the accident data, it should be noted that that data from 2020 has not been included within the review, this should have been considered as part of the most recent 5-year period.

##### Highway Layout

##### Access Arrangements

The proposed access to the residential development of the development will be from Tring Road via a new priority T-junction. The access is proposed to be located 2m further south than the location

proposed by the original submission. This is in line with the location proposed under the refused scheme (Ref: 20/01754/MFA).

Comments provided by HCC (received 22 July 2020) in regard to the refused scheme offered no objection to the proposed access arrangements.

Submitted visibility splays show an access road width of 5.8m and kerb radii of 7m and 10m.

Information should be provided for access gradient and will be required as part of a Section 278 Agreement submission.

Further information should be provided on the proposed internal development, including road widths. A pedestrian footway is proposed to the front of dwellings 1-6. This will connect to the existing 2m wide footway network located at the Tring Road / Grange Road junction, providing connectivity to the village.

#### Visibility

Appendix F includes the proposed junction visibility splays. The junction provides adequate visibility, 76m of visibility can be achieved to the right, and 43m to the left. The drawings indicate that vegetation, within the visibility splay to the right, will need to be cut back. Originally the applicant intended to extend the 30mph speed limit past the site access by way of a TRO contribution to assist in reducing vehicle speeds in the vicinity of the proposed access. However, as part of the amended application this was no longer considered necessary.

#### Swept Path Assessments

Swept path assessments have been provided for a refuse vehicle accessing the proposed development site and using the internal road network and is shown in Appendix G of the Transport Statement. These are considered acceptable.

#### Accessibility

##### Public Transport Bus

The closest bus stop to the proposed site is on Tring Road, approximately 270m from the site entrance.

The north and southbound bus stops are served by the 164, 167 and 207 services.

- 164 - circular bus route from Aylesbury via Tring and Cheddington. There are six services per day.

- 167 - Ivinghoe - Leighton Buzzard. One service per day.

The southbound bus stop is sheltered, has a timetable, and flag. The northbound bus stop has a flag and timetable only.

This development is not of a size that would generate developer contributions that would facilitate a bus service diversion or increase in

services, nor patronage to make any such diversion/ service increase viable in the long term. This potential for this site to be sustainable appears limited.

#### Rail

Cheddington rail station is located 5.7km north of the site. The station is operated by West Midlands Trains and provides hourly direct services to London Euston, Milton Keynes Central and Northampton.

Public transport to the station is a limited throughout the day; however, the station offers car parking to be use by commuters who wish to travel to London, Milton Keynes or Northampton via train.

#### Walking and Cycling

The updated Transport Statement provides a review of walking and cycling accessibility, as well as local amenities, within the area.

There is currently a footpath on the western side of Tring Road that runs alongside the residential properties up to Wilstone Villiage Hall. Between the Village Hall and the Bus Stop on Tring Road, closest to the proposed development, there is no formal footpath with only a grass verge available.

Updated proposals outlined within the Transport Statement allow for pedestrian access from the site on the eastern side of Tring Road to Grange Road, where pedestrians can walk on a traffic free route into Wilstone via a track which connects the east of Grange Road to Rosebarn Lane.

To promote active travel, and make walking a viable option from the site, developer contributions should be put forward for improvements to the footway provision. This will support Hertfordshire County Council's Transport User Hierarchy which supports greater and safer use of sustainable transport modes. The applicant also states in the Transport Statement that a footway would be provided along the site frontage linking to the footway provision at the junction of Tring Road and Grange Road.

#### Parking

##### Car Parking Provision

DBC adopt a zonal approach to parking in Dacorum. Wilstone is located in Zone C. Dacorum Borough Council set out the following parking standards for C3 residential developments (allocated parking):

- 1.25 spaces per one-bedroom dwelling;
- 1.5 spaces per two-bedroom dwelling;
- 2.25 spaces per three-bedroom dwelling; and,
- 3 spaces per four-bedroom dwelling.
- Plus an additional 0.2 unallocated parking spaces per dwelling, with 5% of all parking spaces provided as disabled parking spaces.

Based upon the above, a maximum of 27 allocated spaces should be provided for the dwellings, 3 visitor parking spaces, and 1 disabled parking space.

The applicant outlines that parking is proposed in in a mixture of on and off plot spaces. Amended plans show an average of 1.5 allocated spaces per 2-bed dwelling and an average 2.25 allocated spaces per 3-bed dwelling. An additional two visitor spaces and one disabled space is also provided. This totals 30 parking spaces. 30 spaces is over the recommended maximum provision which is counter to HCC's LTP4 which aims to promote active travel over the use of private vehicle. HCC does not support an overprovision of parking; however, given the rural nature and location of the site, this would not be a reason for HCC to recommendation refusal of the application.

Each dwelling will be provided with active charge points, in line with guidance from DBC's Parking Standards Supplementary Planning Document November 2020.

#### Car Parking Layout

The applicant outlines that parking is proposed in in a mixture of on and off plot spaces. On-plot spaces will be tandem spaces. An additional two visitor parking spaces and one disabled space are also proposed within the site. No garaging is proposed with all provision in the form of surface parking. This is acceptable.

#### Cycle parking provisions

Dacorum Borough Council Car Parking Standards for residential use state that 1 cycle parking space should be provided per unit if there is no garage or shed provided.

The Transport Statement states that the rear gardens will provide the opportunity for residents to securely store bikes. This is acceptable

#### Travel Plan

Neither a Travel Plan nor Travel Plan Statement have been provided as part of the application. However, due to the size of the proposed development, this is considered acceptable.

#### Construction

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

#### Section 278 Agreement

A S278 agreement would be required for any works within the highway boundary, including improvements to the existing site access.

	<p>Planning Obligations / Community Infrastructure Levy (CIL)</p> <p>Dacorum Borough Council has adopted the Community Infrastructure Levy (CIL) and therefore contributions towards local transport schemes would be sought via CIL if appropriate.</p> <p>Hertfordshire County Council would seek for S106 developer contributions to support improvements to pedestrian infrastructure on Tring Road. Section 106 contributions would be requested in line with HCC's Planning Obligation toolkit (January 2008) which requires the following fees per dwelling type to be SPONS index linked to July 2006 from the point at time at which the figure is calculated.</p> <p>Out of town centre: £625 per 1 bedroom dwelling, £750 per 2-bedroom dwelling, £1125 per 3-bedroom dwelling and £1500 per 4+ bedroom dwelling.</p> <p>Assuming 10 x 2-bedroom dwellings and 5 x 3-bedroom dwellings, the total contribution would be £13,125 – SPONS indexed linked to July 2006.</p> <p>Summary</p> <p>Hertfordshire County Council (HCC) as Highway Authority does not wish to object to the proposed application subject to suitable planning conditions.</p>
<p>Hertfordshire County Council – Lead Local Flood Authority</p>	<p>It is acknowledged that as LLFA we have previously provided comments on application reference 20/01754/MFA in our letter dated 09 December 2020 at this site, which was for the construction of 28 dwellings.</p> <p>We ask that the LPA and applicant reviews our response to application reference 20/01754/MFA with regards to site specific comments and walkover which were undertaken in November 2020.</p> <p>As LLFA we previously provided comments in our letter dated 30 April 2021.</p> <p>The applicant has provided the following additional information in support of the application:  - Flooding and Drainage Technical Note, Issue 2, dated 12 May 2021, Ref. 024_8180891_CS_Technical Note, prepared by Glanville.</p> <p>The applicant has previously provided the following information in support of the application:</p> <ul style="list-style-type: none"> <li>• Flood Risk Assessment and Drainage Statement, Tring Road, Wilstone, Ref: 022_8180891_AP_FRA_&amp; Drainage_Statement, Issue 6, dated 26 March 2021, prepared by Glanville.</li> </ul> <p>We can provide the following comments regarding the additional information submitted.</p> <p>Regarding adequate management and treatment of surface water, the</p>



applicant has detailed how the entirety of the access road has been converted to permeable block paving. Permeable paving provides water quality treatment as water percolates through the pavement layers. Therefore, surface water run-off from the access road will be adequately treated prior to discharge off-site.

This is shown in the Indicative Surface Water Drainage Strategy, Drawing No. 8180891\_SK11, Rev. P2, dated 11/05/2021.

Regarding justification of SuDS features, the applicant has now provided justification on the need for underground crates, which are being provided as high porosity permeable paving sub-base.

Regarding clarification on modelling and calculations including provision of half drain down times. The applicant has now provided the 1 in 1 and 1 in 30 output. Regarding half drain down times, the applicant has provided an explanation of the findings shown in the MicroDrainage software, and instead included calculations they have undertaken using depth hydrograph tables and the attenuation features (storage structures). This shows that half drain down times are achieved within 24 hours for the 1 in 100 year plus 40% for climate change event.

Regarding the supporting information provided for 20/01754/MFA, the applicant has now submitted the Technical Note provided in support of application reference 20/01754/MFA, this is shown at Appendix F of the technical note submitted.

With regards to groundwater, the applicant has undertaken groundwater monitoring in October/November 2018. The applicant has also undertaken additional groundwater monitoring between November 2020 and January 2021.

The applicant has detailed how groundwater levels for the site (at boreholes WS1, WS4 and WS5) are at 1.04m, 1.12m and 0.69m bgl at their highest level respectively. The applicant has provided the groundwater monitoring results at Appendix G. From a review of Appendix G, a groundwater level of 0.28mbgl was also recorded (at WS2) however, as a location plan has not been provided, we have been unable to determine the locations of the recordings on site.

Due to high groundwater levels on the site, as part of the detailed design, the applicant will need to demonstrate that the site is being adequately secured against groundwater, by lining all SuDS features and mitigating against the affects of groundwater on site.

The applicant has detailed how a number of measures have been proposed to mitigate against high groundwater levels, including the raising of ground and finished floor levels above the existing ground level and lining drainage features (e.g. permeable paving and crates). The applicant has detailed how floatation calculations will be carried out as necessary at detailed design stage, ensuring risk mitigation.

To be secured by way of condition, we recommend that due to the site being impacted by groundwater levels, the applicant should undertake

an assessment of this flood risk and its mitigation. In addition to details on how the site drainage features will be secured against groundwater.

The drainage strategy is based on permeable paving with sub-base and geo-cellular storage with discharge at 2l/s into a ditch, which then immediately discharges into the Grand Union Canal.

On the basis that the applicant agrees to address any outstanding clarifications as part of the detailed design and agrees to the below pre-commencement condition, as LLFA we can advise the LPA we can remove our objection on flood risk grounds.

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

#### Condition 1

The development permitted by this planning permission shall be carried out in accordance with the Flooding and Drainage Technical Note, Issue 2, dated 12 May 2021, Ref. 024\_8180891\_CS\_Technical Note, prepared by Glanville and the Indicative Surface Water Drainage Strategy, Drawing No. 8180891\_SK11, Rev. P2, dated 11/05/2021, prepared by Glanville and the following mitigation measures:

1. Limiting the surface water run-off rates to a maximum of 2l/s for all rainfall events up to and including the 1 in 100 year + climate change event with discharge into the ditch on site before ultimate discharge into the Grand Union Canal.
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. Implement drainage strategy utilising lined permeable paving with sub-base, attenuation crates and flow control with piped connection into the ditch.

Reason: To reduce the risk of flooding to the proposed development and future occupants.

#### Condition 2

No development shall take place until the final design of the drainage scheme is completed and sent to the LPA for approval. The surface water drainage system will be based on the submitted the Flooding and Drainage Technical Note, Issue 2, dated 12 May 2021, Ref. 024\_8180891\_CS\_Technical Note, prepared by Glanville and the Indicative Surface Water Drainage Strategy, Drawing No. 8180891\_SK11, Rev. P2, dated 11/05/2021. The scheme shall also include:

1. As the site is impacted by groundwater, a location plan showing groundwater monitoring locations and associated results, an assessment of this flood risk and its mitigation. Details on how the site drainage features will be secured against groundwater should also be provided.
2. Provisions for maintenance of the ditch to ensure suitability for conveyance of the site discharge to the canal.
3. Provision of a detailed catchment assessment of the ditches / potential ordinary watercourses, ensuring effective management of this risk.
4. Full CCTV survey and condition assessment of the connection between the ditch and the Grand Union Canal, along with any maintenance or remedial works.
5. Detailed engineered drawings of the proposed SuDS features including their location, size, volume, depth and any inlet and outlet features including any connecting pipe runs and all corresponding calculations/modelling to ensure the scheme caters for all rainfall events up to and including the 1 in 100 year + 40% allowance for climate change event, with a supporting detailed contributing area plan.
6. Demonstrate appropriate SuDS management and treatment for the entire site including the access road.
7. Provision of half drain down times within 24 hours.
8. Exceedance plan for events greater than the 1 in 100 year plus 40% for climate change event.

Reason: To prevent flooding by ensuring the satisfactory storage of and disposal of surface water from the site

### Condition 3

Upon completion of the drainage works for the site in accordance with the timing / phasing arrangements, the following must be submitted to and approved in writing by the Local Planning Authority:

1. Provision of a verification report (appended with substantiating evidence demonstrating the approved construction details and specifications have been implemented in accordance with the surface water drainage scheme). The verification report shall include photographs of excavations and soil profiles/horizons, installation of any surface water structure (during construction and final make up) and the control mechanism.
2. Provision of a complete set of as built drawings for site drainage.
3. A management and maintenance plan for the SuDS features and

	<p>drainage network.</p> <p>4. Arrangements for adoption and any other measures to secure the operation of the scheme throughout its lifetime.</p> <p>Reason: To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site.</p> <p><u>Informative to the LPA / Applicant</u></p> <p>We request that the LPA inform the LLFA if planning permission is granted, as we as LLFA will undertake an assessment of the ditches on and around the site to determine if they should be classified as ordinary watercourses; this also includes the ditch alongside Tring Road, at the proposed site access. As a result of this assessment, if the ditches are determined to be ordinary watercourses, the construction of the proposed outfall headwall into the ditch, along with any modifications to the ditch as a result of the site entrance will require prior written consent from the Lead Local Flood Authority (Hertfordshire County Council) under the Land Drainage Act 1991. Land drainage consent is needed regardless of any planning permission. For further guidance on ordinary watercourses please see our ordinary watercourses webpages:</p> <p><a href="https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/ordinary-watercourses/ordinary-watercourses.aspx">https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/ordinary-watercourses/ordinary-watercourses.aspx</a></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> <p>We understand that the applicant also owns the land between this site (the red line boundary) and the ditch bounding the northern part of the field (where the site discharges into the canal). We would recommend that the LPA obtains from the applicant easements so that this pipe can be maintained in perpetuity for the lifetime of the development.</p> <p>If the LPA decides to grant planning permission, we wish to be notified for our records.</p>
<p>Conservation and Design</p>	<p>This is a field to the north east of the centre of Wilstone. Modern post war housing lies between this and the historic village core with its listed buildings and conservation area. The impact on these heritage assets would therefore be minimal. Nearby to the north is the Aylesbury Arm of the Grand Union Canal. This has a number of listed structures namely a bridge and the locks. The impact upon the significance of these would be at a nominal level due to the distance to the site and the intervening vegetation. This impact would be a minor change in character from the wider setting of agricultural land to that of a developed space. The view back towards the village can be appreciated from the bridge looking towards Wilstone where the new housing is visible across the field.</p>

	<p>The character of the immediate area is that of mature front gardens with houses set back from the road. The houses to the roadside are single storey bungalows with pyramidal roofs</p> <p>The proposed new housing has been reconsidered since the earlier proposal. We believe that it and the layout are now in keeping with the general character of the area. They would reflect and respond to the general character of the village and the mix of house types would add to the visual interest when entering the village. This and the review to ensure that the housing to the street faces the village and appropriate boundary treatments are to be used would ensure that overall the scheme would be successful.</p> <p><b>Recommendation</b></p> <p>The proposal would not cause harm to the designated heritage assets or their setting. The design, layout and materials are now appropriate and in keeping with the character of the area. As such we would not object to the proposals. External materials, hard and soft landscaping subject to approval.</p>
Environmental Health - Contamination	Comments awaited
Environmental Health – Noise and Pollution	<p>The development is outside aircraft noise and other transportation noise significance contours. The site is also outside the Air Quality Management Zone.</p> <p>Due to the limited scope of the development it is considered that the proposals will not negatively impact on neighbouring property.</p> <p>I therefore have no objection to the application</p>
Trees and Woodlands	<p>According to the information submitted no trees will be adversely affected by the proposal. The applicant has indicated within the 'Site Plan' a number of new tree plantings for the proposal. However, no further information relating to either a tree planting scheme or aftercare programme has been submitted. Consequently, I require the applicant to provide further information relating to tree planting. This should include species, location, size, and aftercare, all in accordance with current best practice.</p>
Canal and River Trust	Comments awaited
NATS Safeguarding	Comments awaited
Thames Water	Comments awaited.

## APPENDIX B: NEIGHBOUR RESPONSES TO CONSULTATION FROM 1<sup>st</sup> APRIL 2021

Address/Neighbour	Comments
17 Dixons Wharf	<p>Planning application reference: 20/01754/MFA was recently refused on the following grounds:</p> <p>"The proposed development, by reason of its scale and siting, would result in a disproportionate extension to the village and result in significant harm to the character and appearance of the countryside contrary to Policies CS1, CS2, CS7, CS10 and CS20 of the Core Strategy. Although the Council is not currently able to demonstrate a five year housing land supply, the Council is not satisfied that the benefits of allowing the development would clearly outweigh the harm to appearance of the countryside under paragraph 11 of the National Planning Policy Framework (NPPF) given that there would be a clear conflict with the requirements under paragraphs 77 and 78 of the NPPF".</p> <p>This application is for development of the same site and all of the above applies equally to this application as it does to the one refused. While it may relate to 15 rather than 28 dwellings, this is still the same site (acknowledged as being inappropriate for development as greenfield land that has not been allocated for development), and it would result in significant harm to the appearance and character of the countryside.</p> <p>It is therefore inconceivable that the local planning authority would consider granting permission to this application, having refused the previous one for the reasons stated.</p> <p>Furthermore, as a professional ecological consultant of 20 years who sits on the Institute's Professional Standards Committee, I would also be keen to talk to you about the biodiversity metric recently carried out and supplied with the revised application. It seems to suggest that the creation of an area of 0.01 ha of woodland habitat outside of the site (that's 10m by 10m, which probably wouldn't even qualify as a small copse) would offset all of the other impacts to biodiversity relating from this development <u>and</u> generate a 50% improvement upon that baseline. Logically, you can see why that would be difficult to comprehend and I would strongly question that conclusion.</p>
22 Dixons Wharf	<p>Why is a development on a green field even being remotely considered?</p> <p>There are plenty of brownfield sites in the area which would benefit from development. Please don't permit building on a green field, or it is the beginning of the end.</p> <p>Green fields define the area and are crucial for the health of the local environmental.</p> <p>There is a complete lack of infrastructure to support yet more houses - schools, roads, sewage, etc</p> <p>The proposals will also bring yet more traffic to the area.</p>

<p>7 The Green</p>	<p>15 Houses were proposed in 2019 and rejected. Then in 2020, 28 houses was also turned down on the same site.</p> <p>My objections are the same now as in 2019. The development is out of proportion to the size of Wilstone. Wilstone is identified in the core strategy as a small village and should be protected. Wilstone has no schools, employment, library, doctors, dentist, pharmacy and limited public transport.</p> <p>There is already plans for 6 houses to be built in Grange Road and another 6 on the next door site to this proposal. The other developments in recent years have been brown field sites. This one is not.</p> <p>All the construction traffic will have to come through the village which has no footpath as the bridge is weak at the end of the village.</p> <p>The houses were rejected by DBC in 2019 and nothing has changed. These houses should not be approved.</p>
<p>8 Grange Road</p>	<p>With reference to the above planning application, I was pleased to see that Tring Rural Parish Council objected to this proposed development due to the harmful and detrimental impact on the biodiversity of the area.</p> <p>These houses will be mainly for new residents and NOT affordable to the youngsters of our village. Our village although thought to be mainly older residents living here, have like our household 3/4 generations to move into any homes that become vacant, thus keeping the younger residents in the village.</p> <p>Our village is in keeping with areas of outstanding natural beauty. The Biodiversity on the land proposed is full of Nature. We have deer, badgers, foxes, owls, toad and frogs, newts abundant as well as other amphibians. There are nesting birds all along the canal as well as skylarks, partridge, ducks, wagtails and many more using the field proposed.</p> <p>There are Bats using the trees which fly pass my house during the summer.</p> <p>This is a Greenfield Site and SHOULD remain so.</p> <p>Our village is a very quiet place with very little crime, adding such a lot of extra houses could bring in unnecessary trouble.</p> <p>There are hundreds of new houses being built both sides of Aylesbury and we are the first REAL Village near these where people are able to walk and enjoy this peace we enjoy in OUR Village and the surrounding countryside. I have written before stating my opinion as to the "facilities" being not adequate for extra housing.</p> <p>Also, WHERE is the mentioned employment coming from within our village? Other from the pub which has already local residents as employees, there is the Community Shop run by volunteers of which there are several local youngster, ( perhaps learning a trade that could be useful for their future), and a family run Farm Shop where all the family work, employing a few local youngsters.</p> <p>SO it is not exactly a thriving employment area as has been suggested.</p>

	<p>My opinion as I am sure I needn't state, is an OBJECTION to the new proposed development.</p> <p>I wish, at this point in time, to also OBJECT to the further proposed 6 house to be built the other side of the Bridge, also for the same reasons as above.</p>
41 Grange Road	<p>This construction would ruin the general dynamics of the village. 15 dwellings shoehorned into a potential floodplain has problems written all over it.</p>
The Mill	<p>This opportunistic and speculative application must be refused.</p> <p>Reasons:</p> <ol style="list-style-type: none"> <li>1. Overdevelopment of rural location.</li> <li>2. Road safety - the site is on a blind bend near a canal bridge, totally unsuitable for access.</li> <li>3. Drainage - it is known that the water table is very high in this site and there is insufficient drainage already for the surrounding properties.</li> <li>4. Insufficient infrastructure - this is blatant overdevelopment of a village already spoiled by numerous recent developments.</li> <li>5. Traffic - there are already safety concerns re site traffic, the school bus service will be adversely affected.</li> </ol> <p>Please refuse this application, there is no need for further unaffordable housing in this village as seen by the number of unsold recently built properties which have blighted the village.</p> <p>The application conflicts with the following local policies:  CS1  CS2 outside village boundary  Poor Accessibility  Greenfield site</p> <p>A totally inappropriate development all round.</p> <p>Stop the decimation of this former 'village' by greedy property speculators who have totally ruined its character and spirit.</p>
9 New Road	<p>I understand a previous application for 15 houses on this site has already been declined by Dacorum planning, as it is not an efficient use of the land, so why has this been made again?</p> <p>In the past year the site has flooded several times so there can be no doubt of increased flooding in the local area.</p> <p>The entrance to the development would be between a single back hump back bridge and a corner entering the village making access dangerous.</p> <p>The field is a green field site.</p> <p>The current infrastructure of the village is already struggling, low water pressure and the pumping station cannot cope with the current demands,</p>



	<p>what will be planned to support them?</p> <p>Local amenities like Tring School is already fully subscribed, this is before the huge development on Icknield Way - where will the children go to school. Local doctors, dentists, Orthodontists are full.</p>
<p>13 New Road</p>	<p>It is not clear to me why this development is again being accepted for planning consideration. It is not compliant with the Dacorum settlement hierarchy, being in an area designated as not suitable for major developments.</p> <p>The previous proposal for 15 houses was rejected by the planning officer when last submitted, and an application for 28 houses on this field was rejected on grounds of being non-compliant with local and national planning policies.</p> <p>I objected to the previous applications on this field and my objections all apply to this application.</p>
<p>Garden Cottage, Rosebarn Lane</p>	<p>As a resident of Rosebarn Lane, I am concerned that because the farmer will lose access to his land on Tring Road he would then have to drive his heavy machinery up Rosebarn Lane. The Lane would be extremely muddy during the wet winter months. During this past wet winter it was so muddy and flooded that it was almost impossible to get to the allotments.</p> <p>The sewage pumping station is already totally inadequate and there is frequent sewage flooding and an unpleasant smell.</p> <p>All schools and Doctor's surgeries are already over-subscribed and there are huge housing developments being built in Tring which will put even more strain on these services.</p> <p>The only road through the village is narrow and there is no footpath in parts. At its narrowest point, heavy machinery would be passing only a meter away from the front windows and doors of very old cottages. There are many very old buildings in the village and the constant passing of these vehicles could cause structural damage.</p> <p>The bridge over the canal is extremely narrow and not designed to bear the weight of heavy machinery.</p>
<p>Kingfishers, Sandbrook Lane</p>	<p>The NPPF makes it clear that development must not compromise the protection given to areas or assets of particular importance in the NPPF. We believe the proposal does compromise the protection afforded and will have a harmful and detrimental impact on the character of the area.</p> <p>Central to our objection for this application is the definition of Local Housing Need, policy CS20 and the Settlement Hierarchy.</p> <p>This 15-unit scheme proposal does not accord to local planning policy CS20. Any homes built on this site will be sold at 80% of open market prices and offered to purchasers across the borough. These are homes that will not be affordable to parishioners, in housing need on local salaries.</p> <p>The background section of the case officer's report, for a larger application</p>

	<p>on the same land (20/01754/MFA - refused 17 December 2020[see below*]) substantiates that the provision of an Entry Level Exception Scheme ELES (as provided in this re-submitted application) would be in clear conflict with paragraph 77 of the NPPF to meet the requirement for rural housing to address local needs and would fail to meet those requirements under Policy CS20.</p> <p>We concur with the case officer that this and the related application under appeal, are wholly inappropriate for Wilstone and the open countryside. The Rural area is protected in Dacorum's Core Strategy by Policy CS7. The policy clarifies that, "These are the least sustainable areas of the borough, where significant environmental constraints apply. These include areas of high landscape quality, such as the Chilterns Area of Outstanding Natural Beauty, and the countryside between settlements. This needs to be protected to ensure its rural character is retained and settlements keep their separate identities."</p> <p>Crucially, in the knowledge that applications 4/00024/19/MFA, 20/00754/MFA and 21/00854/FUL are all linked, either by the same landowner and/or the same agent, the community are also understandably concerned that these 3 separate applications, in clear conflict of materially important planning considerations, may jointly or severally have significant implications for the village.</p> <p>There is bound to be a significant increase in traffic and the sharp bend on Tring Road opposite the village hall is a blind turning with no pavement and is an obvious danger to pedestrians.</p> <p>The sewage pumping station in Sandbrook Lane is almost at full capacity resulting not only in frequent odours which spread across the village but has had a recent cracked pipe which led to an approximate week long convey of lorries down Sandbrook Lane to solve the problem.</p> <p>It cannot cope with the increase in sewerage.</p>
10 Tring Road	<p>My comments on the updated flood risk assessment and drainage assessment issued on the 26th March are as follows:</p> <p>Whilst 1.5 states "the site is not at risk of flooding and can be developed safely without increasing flood risk elsewhere." I disagree with this completely. The conclusion states that the report demonstrates that suitable provision for the disposal of surface water from the proposed development is "capable of being provided". However, we have recently experienced failures of the sewerage/drainage system in both Wilstone and Long Marston. The pumping station in Wilstone is already inadequate to deal with the problems we currently have.</p> <p>Point 2.16 states that surface water drains to an existing ditch at the north of the site. However, during the recent flood events that we have experience in Wilstone this winter (2020-21) the ditches have been full, including the ditch to the north of the site referred to in this report. Point 6.7 of this report states that "it is proposed to discharge runoff from the site into the ditch located at the northern end of the agricultural field..." However, this ditch was already full during the most recent flooding incident and does not have the capacity</p>

to take the run-off.

Point 2.8 states that high ground water levels were found (resulting in infiltration techniques being unsuitable for this site): It is correct that ground water levels are high in Wilstone and that there is insufficient capacity for excess water to dissipate into the ground during flood events. This is why we have ditches and swales in this area but the ditch to the north of this site has already exceeded its capacity this winter.

Point 4.11 states that there has been a history of flooding along Tring Road between the site and the village; based on anecdotal reporting and evidence this flooding is associated with the existing highway drainage which is likely to be in need of repair and or capacity upgrades to mitigate this source of off-site flooding. We experience flooding along Tring Road and the the flooding is not just associated with the existing highway drainage. In the time that I have lived in Wilstone I have also seen water running down Rosebarn Lane onto Tring Road towards the bourne that runs down Tring Road and to the back of the village hall. The natural flow of water in Wilstone is towards this bourne. Building on this site will increase the risk of flooding.

Point 6.3 states that the Building Regulations part H3 stipulates that rainwater from roofs and paved areas is carried away from surface to discharge to one of the following, listed in order of priority: a) An adequate soakaway or some other adequate infiltration system; where that is not practical; b) A watercourse; or, where that is not practical c) A sewer. However, the sewerage system is overloaded in Wilstone, discharging more water to the ditch at the north of the site would be irresponsible as it is already overloaded and infiltration is not suitable on this site.

The report states in 4.3 "The mapping indicates that the entirety of the site is at a very low to low risk of surface water flooding. As such, the development is not considered at risk from surface water flooding." I have lived in Wilstone for more than 20 years and have over this time frequently observed flooding in the surrounding fields. Therefore I disagree with this.

The report states in 4.5 "The mapping does not indicate any groundwater flood events occurring within the boundary or vicinity of the site." In the time that I have lived in Wilstone I have observed groundwater flooding events in Wilstone including on the surrounding fields. As previously stated during the most recent flooding events in Wilstone the ditch to the north of this site was full and therefore I believe groundwater flooding events could occur on this site.

Point 4.7 states that "The site investigation did indicate the presence of groundwater below ground; however, there are no historic events of groundwater flooding occurring..." During the most recent flooding event I witnessed water forcing its way up through the manhole cover at the corner of Tring Road near the village hall. Therefore I disagree with the conclusion that "...it is considered that flooding from this source is considered low."

Point 4.10 of the report states "The postcode district associated with the development (HP23) has no historical recorded incident of sewer flooding." We have seen repeated incidents of sewer flooding in Wilstone; the pumping station is already inadequate.

Point 4.12 states "The proposed surface water system will be designed to accommodate surface water runoff generated from the new development from rainfall events up to and including the 1 in 100 year rainfall event as well as a 40% increase in rainfall intensity as an allowance for the potential effects of climate change. ....". We are already seeing flooding in Wilstone so the drainage proposals are not adequate to allow for climate change.

Point 4.13 states "...the site is shown to be located within a reservoir flood risk area....The site is considered to at low risk of flooding from all other sources examined with the possible exception of localised highway flooding which would not be expected to extend back into the site. The proposed development of the site is therefore appropriate in flood risk terms according to the NPPF." I believe that flooding on this site is possible because the ditch already floods and some of the fields around Wilstone occasionally flood. I also consider it will increase the risk of flooding elsewhere and therefore I consider it is not appropriate in flood risk terms according to the NPPF.

Point 5.5 states: "The site is considered to be at low or very low risk from all sources of flooding." This statement is incorrect, the site is not at low risk from all sources of flooding.

Point 6.15 states "As a result of the development flood risk will not increase either on-site or elsewhere". This statement is not correct and the report does not demonstrate that it won't.

In the summary and conclusions:

Point 7.3 states: "The site is considered to be at low to very low risk of flooding from all sources examined." The site is not at low risk from flooding.

Point 7.5 states "In line with the drainage hierarchy and the groundwater constraints, the strategy involves discharging surface water into the local watercourse." Running any more water into the 'local watercourse' would be grossly irresponsible.

Point 7.8 states "As a result of the development flood risk will not increase either on-site or elsewhere." This is not correct. We have seen flooding this winter and we [the people who live here] know that flooding does occur both here and in Long Marston.

Point 7.6 states "Attenuation storage will be provided within the deepened sub-base of the proposed roads, parking bays and driveways to ensure that flooding from the network is suitably contained within the site for the 1 in 100 plus 40% climate change storm event." The water table in Wilstone is high already (as this report states). The storage proposals are grossly inadequate. To mitigate the risk of flooding on this site you would need several large additional swales, extra ditches, large mature trees of species that both like water and take up a large amount of it, plus sufficient space for these trees to grow to maturity without their branches or root systems damaging the nearby properties.

Both the report and the proposals to mitigate flooding are grossly inadequate.

With respect to the rest of the application:

The biodiversity report states that arable field has no ecological value. We do see a wide variety of migratory bird species visiting Wilstone, including birds that feed on the arable fields at different times during the crop cycle. I have also seen sand lizards on the fields around Wilstone, presumably attracted to the insect life. Previous developments in and around Wilstone have been development of brownfield sites; loss of this field would represents the loss of a greenfield site. And yet nobody locally would benefit from the development.

Wilstone is a small rural village and in proportion to Wilstone the scale of this development is a large-scale development which is out of keeping with the character of the village.

#### Additional Comments

This is a response to the Land off Tring Road, Wilstone, Hertfordshire Flooding and Drainage Technical Note from Glanville consultants dated 12th May 2021.

The updated flood risk assessment and drainage assessment issued on the 26th March stated under point 2.8 that high ground water levels were found (resulting in infiltration techniques being unsuitable for this site): It is correct that ground water levels are high in Wilstone and that there is insufficient capacity for excess water to dissipate into the ground during flood events. This is why we have ditches and swales in this area and trees like black poplars to mop up the water (but which also have to be pollarded if near to properties).

As already stated the ditch to the north of this site to which the developer intends to discharge water has already exceeded its capacity this winter.

In the latest technical note Glanville Consultants state:

"2.3 [GC] In order to address HCC's concerns regarding water quality, the entirety of the access road has been converted to permeable block paving. Permeable paving provides water quality treatment as water percolates through the pavement layers. Therefore, surface water run-off from the access road will be adequately treated prior to discharge off-site. An updated drainage strategy drawing demonstrating this strategy change is included in Appendix B"

However permeable paving will not be able to provide adequate water treatment because the system already has insufficient capacity.

Glanville Consultants state:

"2.5 [GC] The connection between the site and the ditch has been provided as a piped connection in order to minimise impact on the adjoining field. The site drainage system provides adequate water treatment, and as such providing this connection as a swale /ditch is not required from a water quality perspective."

However, the site drainage system does not provide either adequate water

treatment or capacity and the ditch was already full this winter. If a development were to go ahead a swale would be required together with trees capable of dealing with the excess water; there would also need to be sufficient space for the trees to reach sufficient size to be able to deal with the water without either their branches or root systems interfering with either the new, or with existing properties.

Glanville consultants state:

"2.6 [GC] The connection will be subject to the same management and Maintenance Plan as the site drainage system and therefore will be appropriately managed and maintained in perpetuity for the lifetime of the development."

This is nonsense: The site drainage system already has insufficient capacity and there is no plan either to maintain it, to put swales in, or to maintain the trees that would be required to deal with the excess.

Under 2.15 Glanville Consultants state:

"2.15 [HCC] In addition, from a review of the 1 in 100 plus climate change results, half drain down times have been unable to be calculated as the structure is too full."

The whole system is already full at times of peak rainfall.

Under the summary and conclusions Glanville Consultants state:

"3.2 A suitable surface water drainage strategy has been proposed. This replicates the existing situation, by discharging flows off-site through a piped connection into the Grand Union Canal. By capturing and attenuating flows, the proposed development will reduce run-off from the site and therefore will result in no increase in flood risk to the site or surrounding area."

This conclusion is incorrect and it is nonsense. From the point at which I was standing in flood water this winter in Wilstone the ditch that the developers are proposing to discharge water into was clearly visible upstream of where I was standing. Without large swales and trees to mitigate the risk this development presents an increased flood risk to the surrounding area. Water will not reach the Grand Union canal unless someone pumps it there and keeps pumping; this is not desirable from the perspective of sustainability. Even if somebody does pump water into the canal the canal also overflows downstream. It also still leaves the problem when the pump fails.

Under the summary and conclusions Glanville Consultants also state:

"3.3 This assessment has concluded that the site is at low risk from all sources, and that the proposed development will not increase flood risk to the surrounding areas. Appropriate mitigation measures, such as the raising of finished floor levels, have been proposed to mitigate against any residual risk posed by any flood source."

If that's what this assessment has concluded then this assessment is wrong.

	<p>It is not possible to reconcile the various reports and calculations from Glanville consultants saying that this site is at low risk of flooding or that it presents no increase in flood risk to the surrounding area with the experience that those of us who live here have had standing in flood water this winter. For somebody who has lived in Wilstone for more than two decades and who has experienced several flood events here it is also not possible to reconcile our experience of flooding here with Glanville Consultants' claims concerning "30 year" or "100 year" floods.</p> <p>This proposed development is a large-scale development relative to Wilstone and the revised responses are inadequate.</p>
21 Tring Road	<p>Objection to 4/00024/19/MFA - 15 new two storey dwellings (including two and three bedroom dwellings).</p> <p>This application forms part of the larger location site for a recently refused application (20/01754/MFA - construction of 28 dwellings).</p> <p>The report stated that:</p> <p>4.6 I believe that these properties are not required to meet a local/Parish housing need.</p> <p>4.7 Nor would they be suitable for first time buyers. These entry level homes would not address the requirement for rural housing under the Framework and would fail to meet the requirements under Policy CS20 of the Core Strategy.</p> <p>This proposed development does not deliver significant social and economic benefits in the form of housing and affordable housing and would not support the sustainable development of the village of Wilstone in accordance with the NPPF. The benefits do not weigh in favour of the grant of planning permission.</p> <p>There is no natural boundary beyond the development line of housing to the north west of the site and the remainder of the field towards the canal. To grant planning permission for this application would set a precedent for development of the remainder of the field immediately adjacent to this site and which was subject to the previously refused application for 28 dwellings (20/01754/MFA).</p> <p>In our opinion, the reason for refusal for application 20/01754/MFA is equally applicable to this application, 4/00024/19/MFA:</p> <p>The size and scale of this proposed development is disproportionate to the village and will result in significant harm to the character and appearance of the countryside contrary to Policies CS1, CS2, CS7, CS10 and CS20 of the Core Strategy.</p>
55 Tring Road	<p>There appears to be two applications for the same site. This application 4/00024/19/MFA for 15 dwellings and application 20/01754/MFA for 28 dwellings.</p> <p>This application represents a 5% increase in the total number of dwellings in</p>

	<p>the village of Wilstone, a significant increase for a small village within the rural area.</p> <p>The village offers no amenities other than a pub and a volunteer run village shop for a village in excess of 300 households.</p> <p>The resulting increase in traffic through the village and demands for parking places disproportionate strains on the infrastructure and an increased risk for pedestrians. Furthermore the entrance / exit to the dwellings is close to a hump back bridge with restricted visibility and poses an additional risk to accidents.</p> <p>The development on a green field site, sets a dangerous precedent for future builds, given that previous developments to date, have been on brown field sites.</p> <p>The planning application states that the site is at a low to very low risk of flooding. However there have been various recent flood events in Wilstone and Long Marston.</p> <p>The water courses within the Parish are no longer fit for purpose with a devolved responsibility to Riparian Land Owners for their maintenance, which is clearly ineffective as is evident with several flooding events in Long Marston since 2014 and again as recently as 2020 and 2021 which has flooded properties.</p> <p>A drainage strategy that is dependent on run-off into ditches can therefore only result in an increased risk to an already existing local flooding issue.</p> <p>I understand that the Herts County Council Environment Resource Planning as LLFA were not consulted on the original application.</p> <p>However, they have since objected to application 20/01754/MFA and requested that their same objections apply to 4/00024/19/MFA on the grounds of flood risk and drainage concerns.</p> <p>I therefore object to this application on the above grounds.</p> <p>Additional Comments</p> <p>My previous comments and objection applies equally to the amended application.</p>
67 Tring Road	<p>We object for the following reasons:</p> <ul style="list-style-type: none"> <li>- The proposal is excessive to the requirement of the village as there has been significant new building projects completed in the village over recent years</li> <li>- noise and disturbance from such a large development</li> <li>- concerns over the access into the development just after a significant bend in the road and near a humped back bridge</li> <li>- concern about the amount of additional traffic using Tring Road and the</li> </ul>



	<p>weight restricted bridge</p> <ul style="list-style-type: none"> <li>- the development would be a visual intrusion from our property</li> <li>- significant style of design of neighbouring properties are bungalows and the two storey design would not be sympathetic to the surrounding properties</li> <li>- The current sewerage network in the village is inadequate for the existing demand, additional demand to make the situation even worse.</li> <li>- The surrounding area has been the subject is significant flooding requiring fire brigade attendance, a development such as this will heighten the flood risk significantly.</li> </ul>
70 Tring Road	<p>This application forms part of the larger location site for the recently refused application (20/01754/MFA - construction of 28 dwellings).</p> <p>In his report to committee, the planning officer considered this current application and how it differed from 20/01754/MFA (and why the latter was recommended for approval):</p> <p>4.6 The applicant's assumption is that they can pursue an affordable housing proposal delivering entry level homes in this location in accordance with Policy 71 of the NPPF. It is argued that such housings would meet a Borough wide housing need for this form of dwelling. It is contended that these properties are not required to meet a local/Parish housing need.</p> <p>4.7 The case officer does not agree that the provision of the entry level homes under 4/00024/19/MFA would be suitable for first time buyers and would comply with other policies in the NPPF regards Rural Housing (paragraphs 77-79). These entry level homes would not address the requirement for rural housing to address local needs under the Framework and would fail to meet the requirements under Policy CS20 of the Core Strategy.</p> <p>In our opinion, this proposed development does not deliver significant social and economic benefits in the form of housing and affordable housing and would not support the sustainable development of the village of Wilstone in accordance with the NPPF. The benefits do not weigh in favour of the grant of planning permission.</p> <p>There is no natural boundary beyond the development line of housing to the north west of the site and the remainder of the field towards the canal. To grant planning permission for this application would set a precedent for development of the remainder of the field immediately adjacent to this site and which was subject to the previously refused application for 28 dwellings (20/01754/MFA).</p> <p>In our opinion, the reason for refusal for application 20/01754/MFA is equally applicable to this application, 4/00024/19/MFA:</p> <p>The proposed development, by reason of its scale and siting would result in disproportionate extension to the village and result in significant harm to the character and appearance of the countryside contrary to Policies CS1, CS2, CS7, CS10 and CS20 of the Core Strategy. Although the Council is not</p>

	<p>currently able to demonstrate a five year housing land supply, the Council are not satisfied that the benefits of allowing development would clearly outweigh the harm to appearance of the countryside under paragraph 11 of the National Planning Policy Framework (NPPF) given that there would be a clear conflict with the requirements under paragraphs 77 and 78 of the NPPF.</p>
<p>86 Tring Road</p>	<p>We have written three times before in connection with applications on this site. Having read your detailed document, I endorse and support all the letters from those opposed to the development of the site. The points we would emphasise are:</p> <p>The report acknowledges at 8.2 that the proposals would increase the village by 10% and on this basis cannot be considered a “small development”. I would also add that it would be out of character with this small residential community.</p> <p>Under the headings of establishing precedents and infilling this is our main concern. The earlier housing proposal was to consider developing the land immediately between this proposal and the allotments, I believe that remains available. At earlier planning exhibitions in Wilstone Village Hall we saw proposals to develop the land both sides of canal bridge in Tring Road going towards the junction with Wingrave Road. The area of scrubland to the right of that junction near the back of Dixons Wharf has been bulldozed to clear the small trees and undergrowth to the detriment of the wildlife there – the only conclusion that can be drawn is in anticipation of obtaining planning consent. Continuing towards the village on the same side of Tring Road, there are rumours that the large garden to Loch View could be the site of further development.</p> <p>Our objection therefore is that by allowing this development to proceed it would create a precedent making it difficult to refuse planning consent on these further sites. In effect allowing infill and unfettered development that would irreversibly change the nature of this small community.</p> <p>Additionally, we believe the increase in vehicular movement has been underestimated as any observations undertaken during a national lockdown cannot be representative. At the very least the old canal bridge would be subject to further stress and a 20 mph speed limit all along Tring Road would be implemented. A speed limit and other traffic calming measures was the subject of a recent debate but did not see the referred to in this application.</p>
<p>Goodspeeds, Watery Lane</p>	<p>We consider the submission must be refused because in particular it does not support definition in the NPPF for development in rural or protected areas and Core Strategy policies; CS20, the Settlement Hierarchy, CS1, CS2 and CS7.</p>
<p>4 Wilstone Wharf</p>	<p>We object to the proposal for 15 Houses off Tring Road on the following grounds:</p> <p>The detrimental impact will have on the will have on the rural surroundings and the unsustainable load on the Villages existing infrastructure.</p> <p>The proposal does not accord to CS7 or CS20 the houses are not for 'Local</p>

	<p>Needs'. These housing units will not be a Rural Exception Scheme in the sense that they would offers affordable homes for local people in perpetuity. The proposals are stated as an Entry Level Exception Site aimed at meeting 'affordable' housing need in the Borough. The 'affordable' homes will be sold at 80% of the open market prices.</p> <p>Wilstone is classed as a Rural Area of Development Restraint. The application is in contravention of Dacorum's Core Strategy (Policy CS7 states that small scale development will be permitted provided it complies with Policies CS1 and CS2).</p> <p>The application is contrary to National Planning Policy Framework and not responsive to the local circumstances. The proposal doesn't maintain Wilstone's prevailing village character and would be harmful to the character and appearance of the village.</p> <p>The application site is outside the settlement boundary.</p> <p>The proposed footpath link is only relevant if the development is extended to the north of the site adjacent to the canal (as illustrated on the submitted plan).</p> <p>The development would have an adverse impact on the openness of the Rural Area Beyond the Green Belt and extend the village beyond its settlement boundary.</p> <p>Not a site allocated through the DPD.</p> <p>The development is on a greenfield site that is currently agricultural land.</p> <p>The development would set a precedent making it difficult to refuse future proposals for further development on greenfield sites in Wilstone and Long Marston further eroding the prevailing village character that the National Planning Policy Framework seeks to maintain.</p> <p>Local services are insufficient and cannot sustain the development and will lead to increased car journeys and increase traffic through the village.</p> <p>The current sewer system struggles with the current load and may not be able to cope with this increased load.</p> <p>Proposals for dealing with ground water are inadequate</p>
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**APPENDIX C – CONSULTEE COMMENTS FROM 2019**

<p>Tring Rural Parish Council</p>	<p>The site is on the very edge of Wilstone village. It is a large plot which could easily take up to 35 dwellings, not just the 15 that are subject to this application. The likelihood is that the developer will submit subsequent applications should this one be successful.</p> <p>The Housing Needs Survey conducted in Summer 2018 clearly identified the need for affordable housing across the whole Parish at 13 dwellings – a mix of 1, 2 and 3 bed properties. This application is for 15 dwellings in Wilstone alone that makes it well above the housing needs identified for the entire Parish. The mix of 2 and 3 bedroom properties is not appropriate to</p>
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what the Housing Needs Survey identified.

The application states that the dwellings are for entry level, affordable housing i.e. first time buyers and will be marketed at 20% below the market value. Whilst technically 'affordable' there is a question of affordability for first time buyers where 2 bedroom houses in Wilstone are currently being marketed at £325,000.

The developers approached Tring Rural Parish Council last Summer to discuss their plans. The council asked to postpone any discussions until the results of the Housing Needs Survey had been published. This application pays little or no regard to the Housing Needs Survey findings, or to the process that TRPC are currently following across the Parish to involve the public in open meetings designed to share information.

The site access has been moved from the existing gateway further towards Wilstone Bridge – a single track hump backed bridge with little room for manoeuvre. The reduced visibility over the bridge would make it harder for traffic to enter and exit the site safely. If a car or longer vehicle leaves the site and turns right whilst something is coming over the bridge, it is very tight and questionable whether there is enough room to avoid a collision. The existing speed limit is the national speed limit for this stretch of Tring Road. It was noted that, in the planning application documents, Herts. County Council would be asked to extend the 30 mph limit to encompass Wilstone Bridge and therefore the site access. TRPC would like to see traffic lights installed at the bridge to slow traffic down and make it safer for cars entering and leaving the proposed development as well as on Tring Road – traffic will increase on both sides of the bridge due to the Wilstone Wharf development and this potential development, currently only 15 houses but with land available for double that number.

Due to flooding further down Tring Road towards the village, the small Wilstone sewage pumping station and the "Wilstone sewage smell", TRPC would like assurance from Thames Water that the sewage pumping station has sufficient capacity for this development. If not, there needs to be an agreement between Thames Water and the developer that Thames Water will ensure any upgrades will be undertaken before the development is completed.

The planning application documents assume that the volume of water currently absorbed by the land will not reduce. It is noted that sink hole tests are being conducted on the site currently whilst it is still a field. However, a larger run off will be created by the hard standing from the development. It is unlikely the existing ditch will have the capacity to cope with this run off. TRPC would like to establish who owns the current ditch and where does the water go? If the ditch cannot cope, excess water could flow down Tring Road towards the terraced houses in Long Row which flooded in 2014, thereby causing them to flood again. Careful consideration must be given to the run off and the capacity of existing drainage channels. The Parish Council would welcome a conversation with the developer regarding the future of Wilstone Community Shop and how any development could support the Community Shop.

We therefore recommend the council raise a formal objection to this application.

Canal and River Trust	The Canal and River Trust has no objection to the proposed dwellings. It is not clear if the surface water drainage eventually enters into the Aylesbury arm of the Grand Union Canal via the field ditch. If this is the case the Trust will need to be made aware so they may consider any increase in discharge.
Environmental Health – Contamination, Noise and Pollution	We have no objection to the proposed development in relation to Noise, Air Quality and Pollution
Hertfordshire Constabulary	<p>I have no major concerns , however I would ask that the development is built to the police minimum security standard Secured by Design, this would involve :</p> <p><u>Physical Security (SBD)</u></p> <p>Layout - It's great to see allocated parking close to the houses , I do have a concern regarding the pathway at the back of houses 3 and 4 , if this is for the bins , I would ask that it is gated.</p> <p>Any ground level exterior windows to have been certificated to BS PAS 24:2016.  All exterior doors to have been certificated to BS PAS 24:2016, or LPS 1175 SR 2,  Lighting - timer, (motion sensor lighting has proven to be problematic) no bollard lighting.  Ensure that each dwelling boundary is secure at the side and rear.</p>
HCC Growth and Infrastructure Unit	Hertfordshire County Council's Growth & Infrastructure Unit do not have any comments to make in relation to financial contributions required by the Toolkit, as this development is situated within Dacorum's CIL Zone 2 and does not fall within any of the CIL Reg123 exclusions. Notwithstanding this, we reserve the right to seek Community Infrastructure Levy contributions towards the provision of infrastructure as outlined in your R123 List through the appropriate channels.
Thames Water	<p>Waste Comments</p> <p>With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services">https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services</a></p> <p>'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission:"A Groundwater Risk Management</p>

	<p>Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing <a href="mailto:wwriskmanagement@thameswater.co.uk">wwriskmanagement@thameswater.co.uk</a>. Application forms should be completed on line via <a href="http://www.thameswater.co.uk/wastewaterquality">www.thameswater.co.uk/wastewaterquality</a>."</p> <p>Thames Water would advise that with regard to waste water network and waste water process infrastructure capacity, we would not have any objection to the above planning application, based on the information provided</p> <p>Water Comments On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p>
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**APPENDIX D – NEIGHBOUR COMMENTS FROM 2019.**

Address/Neighbour	Comments
Cllr Hollinghurst	<p>I would object to this development which is contrary to the Core Strategy and will place a significant strain on the existing community facilities.</p> <p>The site is outside the village envelope and is not a site in the emerging Local Plan. There are other sites which should be considered in preference to this one.</p>
17 Dixons Wharf	<p>This proposal is significantly too large for the village and sets a dangerous precedent in relation to development on greenfield land within the context of a small village in a rural environment. The environmental considerations have been substantially underplayed, including the ecology of the area. The ecology report glosses over resources not found (on a single survey occasion) and uses the absence of historical records to suggest that species are absent, when in fact they are regularly present in the fields in this area, such as barn owl, skylark, lapwing and scarce breeding species including yellow wagtail. In addition to all of the other planning policies that would be breached by this application, there is no suggestion of the requirement to deliver biodiversity net gain (soon to become mandatory under the Environment Bill) and the plans reflect that with their tokenistic approach to landscaping, where significant and genuine gains are in fact needed to address the widely acknowledged climate and biodiversity crises. The infrastructure of the village is not in a condition or of a scale that would allow for the effective absorption of this many new residents and vehicles and</p>

	<p>should not be permitted. The many recent developments on brownfield land within and adjacent to the village have amply demonstrated the success of that approach to reinvigorating the village and allowing for small-scale expansion without threatening the character of the area, which it is vital to maintain. How will the delivery of environmental mitigation be secured? In a number of recent local cases, Section 106s haven't delivered, as there is no funding for follow up on implementation and/or enforcement by the LPA and so the commitments made are not followed up.</p> <p>Additional Comments</p> <p>The design and access statement references bird and bat nest and roost opportunities to be provided within the buildings themselves (nest and roost units). This very rarely happens in practice and resort is made to external boxes on trees. Building provisions are the better opportunity, so the LPA will need to ensure that the building contractors work to that specification from the very start, or it won't happen.</p> <p>The lighting strategy needs to be mindful of the above installations and sensitive to the environmental context of the site; there are owls (tawny and barn) and a number of bat species present in the area, plus deer, badger etc, so low intensity, hooded, shielded lighting should be used.</p> <p>How is it intended that pedestrians from the development access the canal towpath - there is no roadside kerb between the development and the bridge - the verge/roadside will be dangerous for pedestrians close to the bridge and regular pedestrian traffic will wreck the sensitive roadside verge (rough grassland, wildflowers etc)?</p> <p>The development could have benefit in providing a more secure future for the village shop and pub, but what other contributions are they being asked to make? The development will result in more local vehicle traffic and higher pedestrian numbers along the canal; the roads through Wilstone are already sensitive and the towpath is inaccessible in places during the winter due to mud and general poor condition. Contributions towards towpath repairs and upgrade and local public transport facilities should be sought.</p> <p>While the development appears to have broad regard to its environment, further specific biodiversity contributions should be sought in line with national and local policy and the delivery of net gain - particularly with respect to the detail of habitat/green spaces to be provided - wildflower meadow areas, pond?</p>
21 Grange Road	<p>With regards to the recent proposal of the construction of 15 new 2 storey dwellings off Tring Road, Wilstone, I have concerns on the following grounds:</p> <ul style="list-style-type: none"> <li>- Is the development really going to be affordable to local villagers who work in surrounding areas? I know the information attains that the houses will be available at 80% of normal house prices but is that in line with local wages and incomes? Or is the idea that the development will appeal to those who work in London and want to live in a quiet rural area?</li> <li>- I think that the new proposed access road is too close to the humpback canal bridge and bend in the road. Having walked this area daily, some</li> </ul>

	<p>inconsiderate drivers use Tring Road as a cut through and have little concern for pedestrians as it is. I know that by extending the 30 speed limit further out should avoid this predicament but I still believe that more thought on the siting of the new road is needed. If there is no alternative to the access road, then is there a chance the humpback bridge could be made safer - eg traffic lights or pavement from the towpath to the beginning of Grange Road?</p> <p>- The other issue may or may not be accepted but if/when commencement of the site starts, where are construction workers to park their cars? With regards to the recent and ongoing development at Wilstone Wharf, their cars have been parked further up the road on the other side of the canal bridge causing hazards on an otherwise fairly narrow road. If the thinking is to use Grange Road, then I would like to point out that the road has already got numerous parked cars on it and is used for the school coaches to turn around in.</p> <p>- As an extra point what amenities will it bring to the village? Our community shop which is the hub of the village is looking for new premises as the owner of the building wishes to sell. Would the developers consider offering any help and assistance?</p>
23 Grange Road	<p>We object to the plans on the following grounds:</p> <p>Changing the character of the village and the months/years of misery for the community during yet more construction is really not needed, because:</p> <p>There is a large new housing estate in the neighbouring hamlet of Gubblecote that is struggling for sales of its empty houses.</p> <p>There are several houses in the village that have been for sale for some time with no takers and there is of course Wilstone Wharf that isn't even finished yet.</p> <p>The local school is full to capacity as are the local doctor surgeries.</p> <p>We already have issues with speeding and heavy traffic through the village, where this site is proposed means that all the works traffic will have to travel all the way through the village to site, damaging roads and causing risk to lives (very few footpaths) and property.</p> <p>The wildlife that occupy the field would be a sore loss to the community and area The damage and pollution to the neighbouring area</p> <p>These properties still won't be 'affordable' for first time buyers in this area because of house prices being so high across the parish.</p> <p>There are two brown field sites identified close by in Tring, there's no need to take away any green field</p> <p>There are real concerns about flooding and over use of an already stretched to its limits sewerage system</p> <p>As for transport/vehicle movements, the bus service to and from the village</p>



	<p>is sporadic at best.</p> <p>Commuting using a bus would be impossible as the last bus gets into the village before 5 o'clock and that's only in Bucks school term time.</p> <p>There's no real local employment, the village shop is run by volunteers and the local pub and farm shop have low staff turnover and it's a long way to Tring or Aylesbury with no footpath on the road to either, so we could expect another 30 vehicle movements per day in the village should all dwellings be filled, with likely half of those leaving during AM rush hour not the 7 AM movements claimed in the planning.</p> <p>Agricultural vehicles would also be forced to access the remaining area via Rosebarn Lane rather than through the gate on Tring Road. Rosebarn lane is a foot path, clearly unsuitable for agricultural vehicles and used daily by children going to and from the bus stop.</p> <p>There are only 2 visitor spaces allocated for the 15 dwellings, this is clearly not enough and will impact the, already crowded with cars, Grange Road which is all on street parking.</p> <p>We are aware that it will not be taken into consideration but we are expecting, should planning be granted that provisions have been made for parking of construction workers other than using Grange Road and Tring Road to dump their vehicles. The top of Grange road is used 4 times daily by the school coach as it is the safest place to turn around, it would also hinder the residents being able to park near their homes</p> <p>We are mostly concerned that this development, if granted, will open the flood gates for development of the rest of the green space within the village, ruining the character of it and causing many years of misery during construction, ending with loss of privacy for us all.</p>
24 Grange Road	<p>Several 'starter home' properties in the village have been removed from the market or remain unsold, demonstrating that there is no additional need at this time, therefore I think the valuable asset that is the field and allotment area should be retained.</p>
29 Grange Road	<p>My observations, objections and points of note are as follows:</p> <p>Requirement for Affordable Housing in this Location</p> <p>On the applicant's own admission, they do not have the data to support the level of evidence required to meet the NPPF exception test. Quoting from the Litchfield Report - Exception Site Evidence document in para 2.34 "the stage 2 projections are not yet published (and) are needed to determine the number of potential first-time buyers by type, which is needed for this assessment". The entire document is based on assumptions drawn from data which is, by their own admission, required but unavailable.</p> <p>The NPPF (2018) para 71 states "unless the need for such housing is already being met within the authority's area". Para 4.7 of the same Litchfield Report states "it is possible that some affordable houses for sale are already committed in the 5-year housing supply. We have not reviewed all recent permissions." This shows the applicant has not taken the Adopted</p>

Local Plan into account.

The proposal is contrary to the Adopted Local Plan in that the Dacorum Site Allocations written statement identifies Wilstone as a 'Small Village' and therefore an 'area of development restraint'. The same document identifies three allocated sites within Tring as well as LA5 for potential development within the area. There should be no requirement to develop a green field site over the two brown field sites already identified within Tring.

Para 5.7 states "between 2001 - 2017 substantial fall in younger working age adults and young children". In Grange Road alone there are 31 children born within this time frame and approx. 20-30 more across the wider village.

#### Traffic Statement

Para 2.12 Pedestrian access - "...connecting to the footway network..." - this land is outside the boundary of the proposed development site (the red line) as indicated by the site location plan thereby making connection, as a part of this development, impossible and leaving pedestrians to cross a 60mph road on a bend in order to reach the nearest available footpath. The applicant appears to have not understood this issue.

Para 4.2 Walking & Cycling states "...influenced by perception and prejudices of... local topography and attitudes towards particular travel modes." - There are very few footpaths in the village as a whole, none in the centre of the village and none on the roads leading into or out of the village. There are also no cycle paths on any of the surrounding 60mph roads. This development is aimed at first-time buyer families meaning a high potential for small children and pushchairs. I would suggest that common sense and safety is more likely to be a factor to preventing people walking or cycling to local areas than 'perception, prejudices and attitudes'.

The minimum acceptable distances for walking and cycling are stated as being 2km and 5km respectively. Whilst Tring is 4.5km away by road, these roads are, in the main, 60mph narrow country lanes with no footpath or cycle path making the journey very dangerous, particularly for younger children/inexperienced cyclists.

It is possible to walk to Tring using footpaths however it means using the canal towpath network and results in a approx. 5.8km walk one way - outside the minimum distance stated.

Para 4.7 Bus services - Circular 164 route provides 6 buses per day from the village. The timetable does not work for commuters to Aylesbury as the last bus returns to the village at 16:42. It is also important to note that the 07:27 and 16:42 only operate during Buckinghamshire school term times. Wilstone is in Hertfordshire so term times can differ to Buckinghamshire and children can and do attend both Buckinghamshire and Hertfordshire schools.

#### Traffic Impact

TRICS data analysed is not like for like - data was taken from surveys in Shropshire, Staffordshire, North Yorkshire, Cheshire and Greater Manchester

Selected location for surveys is 'Edge of Town' - Wilstone is a rural village

Sub-category selected is 'residential' where 'village' is an option

Car ownership shown as 1.1 - 1.5 avg per dwelling - Dacorum has previously been identified (within Exception Site Evidence document) as being 'Affluent Rural' and "have high levels of car ownership" therefore TRICS data is showing less traffic generated than will actually take place.

Compare to Grange Road

- Approx 45 dwellings avg 2 cars per property = 90 vehicles
- Over 50% leave the road between 07:30 and 09:00 weekdays
- Scale down to 15 properties for comparison and this equates to 15 am outbound vehicle movements as opposed to data suggesting 7 am outbound movements. The proposal will therefore result in significantly (double) the traffic movements currently identified.

Sustainability

Village shop

- Is a community shop run by volunteers. It is only open in the mornings (07:30 to 14:00 (Mon - Fri) 07:30 to 13:00 (Sat) and 09:00 to 12:00 (Sun))
- Premises are on a 3-year lease only and villagers are currently actively trying to find ways to keep it open. If the lease is not renewed there will be no village shop. This happened some years ago when the Post Office moved out and the shop shut. It is only open now because the community took it on.

Bus Service

- 6 buses per day
- Timings unsuitable for commuters to Aylesbury or Hemel Hempstead
- Timings unsuitable for school hours in Tring
- 07:27 and 16:42 services do not operate during Buckinghamshire school holidays
- Buckinghamshire school holidays do not necessarily coincide with Hertfordshire school holidays

Local employment

- Village shop is volunteer run, therefore does not offer an employment opportunity
- The Half Moon Public House has a very low staff turnover
- Other businesses in the village are mainly sole-trader/self-employed/work from home
- Main commuter towns are Aylesbury (7 miles) and Hemel Hempstead (10 miles) and both would require private transport e.g. a car to access

Other points to consider should the application be granted:

Access to Remaining Field

- Where is this proposed to be?
- Rosebarn Lane is not accessible to vehicles
- It is a public footpath
- There is a drainage ditch running the full length of the lane down one side

	<p>- This needs to be addressed as part of the application to avoid highway safety issues resulting from large tractors with attached equipment using unsuitable access points/tracks.</p> <p>Construction Traffic</p> <ul style="list-style-type: none"> <li>- Full construction plan to be put in place</li> <li>- Canal bridge is 10T MGW and a listed building</li> <li>- Construction traffic over 10T will have to come through the village</li> <li>- No construction traffic should be allowed to park in Grange Road before 09:00 and after 15:00 to allow residents access to their properties and parking</li> <li>- No deliveries to the site should be allowed before 09:00</li> <li>- Parking for construction workers should be identified away from Grange Road e.g. a temporary car park on the construction site or adjacent to it.</li> <li>- Grange Road is a cul de sac with a high % of school age children, full risk assessment of any construction traffic using Grange Road should be undertaken and safety action taken to ensure children can still play safely in and around the area.</li> </ul> <p>Future Development</p> <p>- The application form states that 'pre-application advice was sought on a large residential proposal for the application site and adjoining land (4/00427/18/PRE)'. Presumably the outcome wasn't favourable resulting in this revised application. The concern is that, should this be granted planning permission, it would be setting a precedent for future development of the remaining field and those adjoining. The pre-application advice indicates this is highly likely to be part of the developer's future plans. By proposing to site the new access road to the north of the development, rather than leaving it where it is currently, they are providing themselves with easy future access to any further development of the site in the future.</p>
31 Grange Road	<p>Our objections are as follows:</p> <p>Local school places</p> <p>The additional housing will put pressure on local school places. The local primary school was oversubscribed in the last intake, with siblings being sent to different schools. The local secondary school is oversubscribed each year. Three bedroom houses will most certainly bring families, possibly the two bed too. Where are these children to be schooled? Will they leave locals whose families have grown up in the area without a school place?</p> <p>The local housing market</p> <p>There is no demand for two and three bed houses in this village. There are reasonably priced houses on the market currently. An example - a 4 bed has been on the market for over 6 months in Grange road, priced at £395,000.</p> <p>In January 2019 the average house price in Wilstone was £568,606. 20% less than this price is £454,884. A comparison of these figures shows that the house on Grange Road is available for over 20% less than the market average for Wilstone - yet it has not sold. It is not the only house available on the market in Wilstone, which has not sold in the last year.</p>

	<p>Newly built houses have not sold, and other houses within the village have even been taken off the market due to lack of interest. There is simply no demand currently for houses in Wilstone.</p> <p>Loss of wildlife</p> <p>Woodpecker and Cuckoo are both on the endangered list and the Cuckoo is Protected in the UK under the Wildlife and Countryside Act, 1981. Woodpecker and cuckoo, although do not nest in the field, nest nearby and feed in the surrounding fields. Extensive research has shown that these bird numbers are in decline and these are caused primarily by changes to fields, including grubbing up of hedgerows to create larger fields and ploughing up closer to the edge of the field - which will invariably happen if this site is built upon. Also drainage to dry out damper areas and remove wet flushes from others - which will need to be done in order to build - will have an impact upon the feeding for these birds and therefore result in a decline in numbers.</p> <p>Increased noise, disturbance and traffic</p> <p>The proposed site will have access on a bend near a hump back bridge with poor visibility. There is no footpath from the site to the village. The point of access to the site is right next to a 60mph speed limit. This is hazardous to all road users and to those locals that walk along the road currently. The increase in traffic will increase the noise. 15 homes with 2 cars per home, 30 additional cars each leaving the village and returning - at least 60 additional journeys per day to and from the village will increase risk, noise and pollution.</p> <p>Employment locally</p> <p>The bus service from Wilstone does not support a person commuting to work away from the village. Six buses per day leave to Aylesbury and only one to Hemel Hempstead, which leaves at 9.53am - not much use for a working commuter. There is limited employment within walking distance - one can volunteer in the village shop, or work in the local pub, which already has its own loyal long serving employees. The local school has a low staff turn-over too. There is therefore no opportunities to contribute to the village through work, and no way to commute to local areas without the use of a car and contributing to a different community - possibly a commute to London.</p> <p>Sewage</p> <p>The village has its own sewage system which often cannot cope with the sewage the houses in the village currently create. The new houses will be connected to the system - have the developers given any considerations to the impact this will have? Or will it be too late as they will have already left before issues occur?</p>
40 Grange Road	<p>I wish to object to the proposed development on the following grounds :</p> <p>Loss of a greenfield site and over development of a rural location.</p> <p>The flood risk has not been adequately covered - the groundwater survey</p>

	<p>was undertaken during one of the driest summers on record. During periods of heavy rain, standing water regularly gathers at the top of Grange Road and by the Village Hall. The suggestion that surface water can be discharged to the existing field ditches seems inadequate.</p> <p>Affordability of proposed housing - the market for housing in the village remains fairly static. Where is the demand for this type of development?</p> <p>Existing infrastructure can't support the continued development of the village - the existing public transport does not support the developers claims that those services will provide the means for new residents to commute to major transport hubs</p> <p>The proposed site will exit onto a busy road with further restriction by the canal bridge which is single track. Increased development around outlying towns has significantly increased the volume of traffic cutting through the village at peak times.</p> <p>The existing sewage system in the village is barely adequate and has a history of failure particularly at times of flash rainfall.</p>
13 New Road	<p>I would like to add my support to all the objections already made by my fellow villagers.</p> <p>I have only lived in Wilstone for just over two years and in this time there have been several developments in the village. Few if any of the recently built dwellings have sold.</p> <p>In every recent application it has been stated that the infrastructure and amenities in Wilstone make it an area suitable for sustainable development. How much development would the village be required to absorb before developers were unable to make this claim which is clearly not shared by villagers?</p> <p>The developers are describing the proposed development as 'affordable' family homes (even though they are unlikely to be affordable!).</p> <p>Although affordable social housing may be needed far more than the 'exclusive' developments popping up all over the place, the proposed site is an agricultural field. I suspect that granting planning permission would set a precedent for future unrestricted development in the area.</p> <p>I therefore object to this application</p>
Conifers, Rosebarn Lane	<ol style="list-style-type: none"> <li>1. The proposed houses will be too expensive for first time buyers and won't meet the affordable housing remit.</li> <li>2. Access will make a hazardous road more dangerous.</li> <li>3. The local school is full.</li> <li>4. Development of this site would make it difficult to refuse future proposals for housing development in this area of the village.</li> <li>5. Fifteen houses will cause an increased burden on over stretched utilities: eg sewage, water etc</li> </ol>

<p>Garden Cottage, Rosebarn Lane</p>	<p>I am resubmitting my objection as I haven't had confirmation that you have received my previous comments.</p> <p>I object to this development and totally endorse all the reasons made by other parties.</p> <p>It has been brought to my attention that there is a suggestion that all agricultural vehicles should access the farm land behind the development via Rosebarn Lane. At its entrance, the Lane is only just wide enough for a small delivery van and it narrows considerably towards the top end. It is a public footpath and is used daily by children walking to and from the school bus stop, walkers and dog walkers.</p>
<p>Rosewood House, Rosebarn Lane</p>	<p>I submitted my comments earlier and have had email confirmation but can't see them listed online so am submitting once again.</p> <p>Incorrect Assumptions -----</p> <p>In the Executive Summary of Lichfields Exception Site Evidence, table 1.1 illustrates a 5 year projection from 2017 - 2021 of potential demand from first-time buyers. It is not correct to include potential demand from the past as we can only address demand in the future, so using the figures from 2019 - 2021, the average demand per annum is reduced from 322 to 285. According to this table, demand is reducing each year so if we were to project the figures forwards, to cover a 5 year period from 2019 - 2023, the average reduces further to 260 per annum, some 62 houses fewer than stated in the table.</p> <p>Lack of Clarity -----</p> <p>It is not clear what happens if the demand for 15 new build properties aimed at first time buyers at a discounted rate is not met and some or all of the properties are unsold? Is there a time limit on selling the properties and if so, what happens after that? Can they be sold un-discounted at market rates?</p> <p>Who determines the eligibility of buyers of these properties - both initially and in the future when properties are sold on?</p> <p>How will this be policed?</p> <p>Item 1.4 c) of the Exception Site Evidence document states "Provisions should be in place to ensure housing remains at a discount for future eligible households". What provisions have been put in place? What governance will exist around this, as this goes to the heart of the justification for such a proposed development?</p> <p>Loss of Access -----</p> <p>Item 2.2 of the Planning Statement refers to an existing agricultural access on the western boundary site. The application should make provision for continued access across the development through to adjoining fields, and this should be a condition of planning.</p> <p>Traffic</p>

	<p>-----</p> <p>The approach to Wilstone Bridge is already hazardous, with the frequent sounding of vehicle horns as traffic approaches the bridge. The situation can only get worse with the introduction of an additional 30 + 2 vehicles some turning right towards the bridge and presents an increased safety risk and potential increase in noise.</p> <p>Transport</p> <p>-----</p> <p>Item 3.1 of the Design and Access Statement states that 2km and 5km are acceptable distances to walk and cycle to nearby facilities - is this opinion or is there a study that can be referenced? There are few pedestrian paths from Wilstone to Tring, Aston Clinton or Cheddington and similarly, no cycle paths, which makes travelling other than by car or bus, challenging and treacherous. In practical terms, the only option to access Railway stations or supermarkets for shopping, will be by car. If time is not a constraint then taking the bus may also be an option.</p> <p>Building a development in this part of Dacorum, aimed at young first time buyers already acknowledges that buyers will be in full time employment and will therefore be travelling out of Wilstone (and possibly Dacorum) to their place of work as there are limited job opportunities in the immediate area of Wilstone, Aston Clinton, Cheddington and even Tring.</p> <p>Environmental</p> <p>-----</p> <p>Item 4.10 of the Design and Access Statement covers sustainability but makes no provisions for home owners being able to own and operate electric vehicles (in line with the Government strategy "Road to Zero"). There is a missed opportunity by not including home charge points for each property in this design. PV panels and Solar water heating would also add to the sustainability of the development (although the orientation of the roofs/houses in the design would need to be changed to achieve greater efficiency).</p> <p>Additional Comments</p> <p>I have read all the comments made by other parties, and fully endorse their reasons for objecting to this development.</p> <p>It has also been brought to my attention that there is a suggestion that all agricultural vehicles will access the fields behind the development via Rosebarn Lane. The Lane is only just wide enough for a delivery van at the entrance and it narrows considerably the further up the lane you go. It is also a public footpath and is used daily by school children going to catch the bus, walkers and dog walkers.</p>
10 Tring Road	<p>I'm objecting on the grounds that this application contains false information. Therefore no-one, especially the council, can assess this application properly until the false information is corrected.</p> <p>1. Jeffrey Rodwell is the first named person on this application. Jeffrey was our friend and neighbour for 19 years and he died in March 2018, nearly a year ago. So Mr Rodwell cannot possibly be behind this application.</p>



2. William Philip Jeffries is the 2nd named person on this application. As Philip Jeffries has been in a dementia home for several years he too cannot possibly be behind this application.

3. I quote, "Despite seeing growth, the village has aged significantly over the last 15 years..."

WHERE IS THE EVIDENCE BEHIND THIS STATEMENT?

We have been Wilstone residents for 20 years and during that time a number of elderly people in the village have died and their homes have been filled with young families, so we have seen the village become considerably younger during that time. I can support this with numerous examples, should you need them.

Please can we have this false information corrected:

Who is really behind this application, as clearly it is neither of the two named applicants, Jeffrey Rodwell and William Philip Jeffries?

Where is the evidence for the statement that Wilstone is an ageing village?

Only when we have accurate information can this application be properly considered by all concerned.

Please do not edit my comments.

Where previous developments in Wilstone have involved the loss of brownfield sites, this development represents the loss of a greenfield Site.

The "Exception Site Evidence Local Context Wilstone" demonstrates that the application has not understood the local context and does not reflect it. The trend here is that as elderly residents are dying off, younger people are moving into the village and moving into the homes that have been vacated. The suggestion that the village will see population decline is complete nonsense. I am aware of a present need for single storey bungalow accommodation for some of the more elderly residents. The development at The Mill, which represented the loss of one of the more substantial brownfield sites, did not result in the provision of "affordable" housing and I do not believe that this proposal for "first-time buyers" will result in "affordable" housing either; the local plan produced by Tring Rural Parish Council should be consulted on this.

Under Planning and Regeneration "Assessment of flood risk" it states that surface water will be disposed of via an existing water course. Elsewhere it says that this will be run off to the existing ditch. The position of this site is between the canal and the village so unless further drainage is provided the run off is likely to end up at the corner of Tring Road next to the village hall where there is already a flooding problem. A full flooding risk assessment should be completed as the statement here is inadequate; even in summer we get flash floods on the corner of Tring Road next to the Village Hall. Allowing the drainage from 15 houses plus the hard standing areas to run into the existing ditch without further provision is not acceptable and it will result in an increased flooding risk as the water table in Wilstone is so high.

	<p>The plan states that these houses will connect to the existing sewage system. The existing sewage system is overloaded and cannot adequately cope with the sewage from Wilstone without creating a foul stink.</p> <p>Under 2.7 states that "Given the extent of facilities and services available at the Village Wilstone is considered a reasonably suitable location for housing growth": However, the local schools are oversubscribed, the local bus services are infrequent; the local school bus is also full - my daughter presently cannot get on it and is having to travel by taxi to school. The statement that the infrastructure is here to support this development is nonsense.</p> <p>Finally the application states that the first applicant is my friend and neighbour Jeffrey Leonard Rodwell [mis-spelt] Jeff Rodwell cannot possibly be an applicant as he died a year ago.</p>
33 Tring Road	<p>We are writing this letter to you as objection to the proposed construction of 15 new houses on the land off Tring road.</p> <p>Firstly, the T junction that is being proposed as access to these properties is being situated on or near a bend, plus the fact that it will be extremely close to the hump back bridge where visibility is already very difficult. On the other hand, it will also be in close proximity to the entrance of Grange Road where there is an increased amount of traffic during peak times. We can foresee road traffic incidents becoming an issue if access were to be placed in this location.</p> <p>The amount of traffic through the village has increased exponentially, since the opening of the A41 bypass, as it is used as a cut through for commuters. This leads me onto my second objection that disruption in the village due to construction vehicles will be intolerable to daily life, which has already been evident from the building site of Wilstone Wharf. Due to the lack of pavements and parking spaces available to non villagers, Tring Road has been terribly disrupted for a significant time since this work started to take place. Construction/contractors have impeded on the traffic flow by bringing it down to single file traffic for at least 200 yards, as well as parking right on the corner to Watery Lane. The grass verges have been completely destroyed and seems that no consideration has been taken into account by these workmen. If planning works were to go ahead for these new houses, we will be in the same scenario all over again but on the other side of the bridge. Large construction vehicles will not be able to gain access to the site via the bridge, meaning they will have to enter from the other end of the village and will be navigating a very tight corner by the village hall where residents park their cars. This corner is already dangerous due to narrowing of the road and it being such a tight corner.</p> <p>After living in Wilstone for over 20 years and while out dog walking, we have seen this area of land has flooded numerous times. Our concern would be that the new unsuspecting home owners will not have been notified of this issue and it will result in significant damage to their homes if this is not dealt with properly. It begs the question, is this area of land really suitable for any type of building?</p> <p>Wilstone has notoriously had a problem with sewage, known locally as the 'Wilstone Whiff', building these 15 new houses will add to the stress of an</p>

	<p>already overloaded sewage system. if the village already cannot cope with the amount of residents and this system, how can more houses be a good idea?</p> <p>One of our biggest concerns is the fact that your submissions state these will be 'Affordable Homes'. We already have houses, including new builds, in the village that have been on the market for over 6 months that have still not sold, so there is clearly no demand for more houses here.</p>
36 Tring Road	<p>I am opposed to this development based upon four issues.</p> <p>I don't believe that there is a due consideration on the pressures on existing infrastructure. Both Long Marston Primary School and Tring School had full subscription last year and there are already a number of developments within the Parish which will place more pressure on this creaking infrastructure (Luke's Lane, Wilstone Wharf, and three properties opposite The Half Moon). Similarly pressure in the sewage systems.</p> <p>In addition the recent housings need survey for the Parish has identified a need for true affordable housing, which these are not.</p> <p>In addition the development is not in keeping with the adjacent properties on the road, which are low level bungalows.</p> <p>Finally, the prospect of access to the remaining agricultural land to the rear of this development, via Rosebarn Lane is not acceptable. This current access is not suitable for agricultural vehicles and will cause substantial damage to the current footpath, surrounding wildlife and natural habitat, and endanger children who are walking to the school bus from Grange Road.</p>
58 Tring Road	<p>I refer to the planning application by Rectory Homes Ltd., for Land Off Tring Road, Wilstone. it is my understanding that the proposed development will be a Rural Exception Scheme, supported by a recent Housing Needs Survey (HNS) by CDA for Herts. I should point out that until retirement in 2015, I was the Rural Housing Enabler for Buckinghamshire for 13 years and involved in the provision of 25 Rural Exception Schemes in the county.</p> <p>I object to the proposed development because I consider that the provision of 15 units is too large. I have analysed and produced many HNS and in my opinion, if it hasn't already been done, the survey results and applicants financial circumstances should be researched further before any planning permission is granted and any homes are built. The following points need to be re-considered, by the Parish Council, CDA for Herts and Dacorum Borough Council;</p> <ul style="list-style-type: none"> <li>- The number, size and tenure of the units.</li> </ul> <p>Does the survey and the development proposal genuinely reflect the need in the parish, or does it represent a desire for the homes by people who would not be in a position to proceed? From my experience, often responders to any rural HNS chose size and tenure options that were not compatible with their income level.</p> <ul style="list-style-type: none"> <li>- The affordability of any units.</li> </ul> <p>The Royal Institute of Chartered Surveyors Red Book, commands that all Affordable Shared Ownership homes must be valued at open market prices.</p>

	<p>The 'affordability' of any units is then set at a percentage compatible with local applicants' income and mortgage capacity. In my experience applicants for the homes need a clean credit history and a deposit of at least 20%. With lack of government funding, it is highly unlikely that any rented units would be let at Social Rent levels. Affordable rent is classed at up to 80% of open market rates.</p> <p>- Both the Shared Ownership and Rented units on the proposed development are likely to be out of reach for many/most local people aspiring to buy or rent those homes.</p>
65 Tring Road	<p>The access to the proposed site is very tight and Wilstone is already struggling with the amount of traffic especially at peak times. I therefore think this development should be refused permission</p>
66 Tring Road	<p>We object for the following reasons:</p> <ul style="list-style-type: none"> <li>- lack of infrastructure for more houses</li> <li>- flooding - even more soak away tarmaced over</li> <li>- all construction vehicles through the village due to weak bridge</li> <li>- affordable housing is not affordable</li> </ul>
67 Tring Road	<p>I would object for the following reasons:</p> <ul style="list-style-type: none"> <li>- proposal is excessive to the requirement of the village as there has been significant new building projects completed in the village recently:</li> <li>- noise and disturbance from such a large development</li> <li>- concerns over the access into the development just after a significant bend in the road and near a humped back bridge</li> <li>- concern about the amount of additional traffic using Tring Road and the weight restricted bridge</li> <li>- the development would be a visual intrusion from our property</li> <li>- significant style of design of neighbouring properties are bungalows and the two storey design would not be sympathetic to the surrounding properties</li> </ul>
70 Tring Road	<p>We wish to object on the following grounds:</p> <ol style="list-style-type: none"> <li>1. The site is located on the immediate edge of Wilstone and will represent an outward northward extension of the village into the countryside. There is currently development at Victory House Wilstone Bridge for 8 housing units. To permit development on this site would lead to will alter the character in this part of the village.</li> <li>2. The site is greenfield and would lead to some loss of habitats.</li> <li>3. There are limited amenities in the village and new residents would have to travel to access main services and facilities.</li> <li>4. Car use to access service and facilities could exacerbate air quality issues.</li> <li>5. Development of this site would make it difficult to refuse future proposals for housing development in this area of the village.</li> </ol>

	For these reasons we object to the application.
71 Tring Road	<p>We live opposite the proposed development and have the following comments</p> <p>1) The proposed development is to be accessed off Tring Road, adjacent the existing single track weight limited hump back bridge. This will result in vehicles entering and leaving the development unseen by the traffic coming over the bridge. This will be an accident waiting to happen</p> <p>2) During construction all the heavy site traffic will need to come through the already congested village. Due to a number of recent developments in the area the through traffic to the village has increased.</p> <p>3) The premis of the proposed development is that the properties will be affordable. The houses are to be 2 and 3 bedroom and a recent three bedroom property in the village was sold for approximately £425K. This price would not be classed as affordable.</p> <p>4) Our property is at the end of the sewer system and the depth of the sewer is 225mm to the invert of the pipe. Therefore how will this developments foul and surface drainage be safely carried away bearing in mind the existing surface water is approximately 1 - 1.5m below ground level.</p> <p>5) When we bought this property one of the attractions was the uninterrupted view of the fields from our windows. This view will now be spoilt if this development is built.</p>
90 Tring Road	<p>This proposed development borders our bungalow at 90 Tring Road. Our bungalow is single storey. Both the bedrooms are situated to the front facing Tring Road. Our bathroom, kitchen and family room where we spend most of our time is facing the field where the development is proposed.</p> <p>Wilstone has a good mix of all age groups. The village has no school. The children use the school bus to travel to both primary and secondary school which are both oversubscribed. There is a number of children travelling by taxi due to no places available on the school bus.</p> <p>The local community shop lease expires in three years. This shop is the hub of our community. A large number of volunteers help run the shop along with many local teenagers as part of their D of E award scheme.</p> <p><b>Loss of light &amp; overshadowing</b></p> <p>We have a large kitchen window which overlooks the field and visually gives us a lot of light along with the family room window. The sun moves away from this side of our property by noon so the proposed two story semi-detached building would result in our kitchen becoming very much overshadowed. The proposed two story semi-detached house will have a higher roof than our property. Our kitchen/family room/bathroom window &amp; back door will be obscured &amp; overshadowed by this building.</p> <p><b>Overlooking/loss of privacy</b></p> <p>Our driveway runs alongside the border of the proposed development to the</p>

back of our property. (Which is not used for parking)

Should this development be granted we will no longer be able to enjoy peaceful enjoyment of our property.

The development being two storey has a landing window which will look directly down all the side of our bungalow where we currently have a driveway. In the summer when it's too hot we normally sit in this area. Also the lounge window of the proposed property has a lounge/dining window overlooking the side of our bungalow.

There is also a public footpath that is proposed to run the other side of our boundary hedge which will run a few feet up to our bedroom window. This footpath will be for all residents on the development. This I feel would be an invasion of our privacy. Potentially there would be heavy use of this footpath with school children and access to the village & park etc. There would also be the potential late night noise from pedestrians coming home from pub in the village and shift workers being dropped off at night, which is currently the case on Grange Road.

#### **Adequacy of parking turning**

Our bungalow is situated on the corner of Tring Road and Grange Road. This is a very busy junction with large delivery vehicles using this junction as a turnaround because of the restrictions on the canal bridge which is listed and has a 10T weight restriction. This junction is also used for the school bus to reverse into and turn at this junction four times a day, along with residents within Tring Road using it as a turning point.

Grange Road is a very busy road with insufficient parking for residents. Most of the day and evening all parking spaces are used. This road is used by residents and the many ramblers and fishermen who also park right beside our bungalow all year round to go on walks through the field and fish on the canal. Wilstone has many ramblers which come through our village and also it is a route for many children hiking as part of the Duke of Edinburgh award scheme.

#### **Noise & Disturbance**

If this development was to go ahead the noise and disturbance would have a big impact on our quality of life. Presently we have the extremely busy Tring Road which our property faces, at peak times of the day it is used as a cut through from surrounding villages, especially trade vehicles. The speed limits are a problem in the village as it is more than often not observed by drivers cutting through our village.

It is proposed on the opposite side of our boundary of the proposed development we would have an additional road coming towards the side of our bungalow with two car park spaces just outside our boundary hedge.

This would mean our bungalow would be surrounded by roads and cars at every angle, as our back garden also runs along Grange road. Grange road is a busy road, most households have two cars with busy families. Most clubs outside school hours are outside Wilstone with parents leaving their homes many times a day.

The Rectory report also states the following: 4.6 Access, Movement & Road Hierarchy Vehicular access to the site is proposed from Tring Road via a new priority 'T' junction in the north-west corner of the site. The access road will be 5m in width throughout the development, with the exception of a carriageway narrowing with rumble strips either side on the first straight section, to provide a form of traffic calming. It is intended to extend the 30mph speed limit past the site access by way of a TRO contribution, which would assist in reducing vehicle speeds in the vicinity of the proposed access. A 2m wide footway is proposed to run along the southern side of the internal access road, exiting the site in the south-west corner and subsequently connecting to the existing footway network at the Tring Road / Grange Road, thus providing a pedestrian connection to the rest of the village.

Not only would we have the possibility of thirty more cars, plus a possible sixteen from Wilstone Wharf but in addition noise from rumble strips near our home, causing additional noise.

This development would take two years + and in our later years we would not choose to live on a building site. There will be noise and pollution not only from the build but the number of trade vehicles and HGV's. As semi-retired and retired along with our neighbours beside us this proposed development the impact of noise, dust dirt and pollution would impact on our quality of life.

#### **Traffic/ junction**

Living at the junction of Tring Road and Grange Road I know first-hand how dangerous this junction along with Tring Road is.

We have to reverse out of our driveway and be on high alert. Traffic from both directions travel at speed and especially from around the bend by the agricultural gate. The peak time volumes at times can have bursts of continuous traffic. The speed limits are in the main not observed by cut through traffic.

The existing and new entrance to this land is at a very dangerous stretch of road. I now believe it is being considered that the new entrance for agricultural machinery will be further up the road or using the new T junction into the development. The movement of agricultural vehicles with trailers would further add to the danger on this stretch of road.

Where traffic going out of the village in the direction of the canal bridge on the bend where the existing agricultural entrance is, cars are inclined to drive wide of this bend and at speed. It is similar to the bend at the other side of the bridge where the new Wilstone Wharf development is. The same issues with cars travelling too fast coming up to the bend where on wet day's there is lots of surface water and cars driving too wide. These areas really are an accident waiting to happen if drivers are not vigilant & don't reduce speed.

The other point is at Wilstone Bridge apart from the current parking due to the development at Wilstone Wharf, cars routinely park either side of the bridge from visitors who walk the canal and fishermen/bird watchers. This

then overflows down to parking in Grange Road to an already congested road, which at the main entrance more often than not cars entering the road have to give way due to parked cars and only enough space for one way traffic.

The diagram show the splay of vision from the new T junction, which shows vision to the kerbside at the front of our bungalow. I do believe that cars coming out of the village towards the canal bridge will have a blind spot at this bend. I travel into the village from this direction twice a day and you cannot see around this bend until you are quite near to it. Cars coming out of the village drive wide at this bend with both drivers having to adjust steering.

The survey by Grenville carried out in other regions of the country is not realistic to traffic movement in Wilstone.

There is no pavement in the village between the Village Hall and New Road past the shop. I have witnessed on many occasions school children weaving in and out between parked cars by the Long Row, Tring Road. The other day I witnessed two school children walking on this section of road and a large HGV with trailer overtook them on the wrong side of the road approaching the bend by the Village Hall. If this development went ahead we would have increased traffic and HGV's through the Village. As a community we have an obligation to ensure the safety of the young children in our village, which at present they are at risk of injury from the lack of footpaths and speeding traffic.

### **Visual Intrusion**

Currently the proposed land is arable agricultural land which I think is outside the village boundary, which the local farmer rents from the owners. Crops are grown annually in this field and the surrounding fields, which is used for animal feed.

This new development is not in keeping with this end of Tring road which is virtually all bungalows. Our bungalow would be overshadowed by a two story house running the length of our bungalow and would visually have an impact on our property as this part of our bungalow does not get the afternoon sun. It would block light and completely overshadow our kitchen/living area which runs along the boundary of this development. In 2013 we built an extension to our existing kitchen and re situated the kitchen door to face the field. This new living area will now be visually overlooked by this development.

This development will change the character of the village from Tring Road, as currently you can visually see the countryside across the fields along with the church steeple in Marsworth. The village will seem more built up until you go over the canal bridge.

### **Wildlife**

This field currently has so much wildlife visiting. We have around several bird feeders on this hedge border with numerous varieties of birds visiting including the woodpecker family who visit every year. There is also visiting pheasants routinely to our garden. Muntjac are also found in this field along



with the surrounding fields who in the evening can be found along the hedgerows.

### **Sewage & surface water**

Since I moved to our property twelve years ago surface water has pooled outside our front gate on the corner of Tring Road/Grange Road. Visiting family and grandchildren who are sitting in the back of the car have been unable to get out of the car due to this. I initially brought this up with highways ten years ago and currently it has not been resolved. Water pools under our front hedge near to the agricultural gate.

It is proposed to provide a new gravity foul water drainage system to serve the proposed residential development and to connect to the existing public sewer within Tring Road

The sewage system in the village has over the years had numerous problems. There are days especially in the summer where you can't walk down the lower end of Sandbrook Lane due to the smell at the pumping station. This should be well documented.

There are areas in the flood report which I am concerned about with reference to the water table and surface water. A digger came on site Sept/October and found water at approx. one metre. This was carried out after the driest hottest summer probably on record.

In the winter months to the upper end of the field near the canal the surface water can be quite high.

Currently the gully ditch on Tring road does not fill with water like it does on the other side of the village, it appears to build up as surface water within the field.

### **Glanville Report:**

5.0 Flood Risk Assessment 5.1 the NPPF encourages a sequential, risk-based approach to determine the suitability of land for development. This document advises that the development of sites within Flood Zone 1 should be given preference where available. 5.2 Table 2 of the Planning PracGce Guidance (PPG) to the NPPF categorises different types of development into five flood risk vulnerability classificaGons: • EssenGal Infrastructure; • Highly Vulnerable; • More Vulnerable; • Less Vulnerable; and • Water CompaGble Development.

5.3 The NPPF classifies the proposed residential use of the site as being 'More Vulnerable'.

### **Also noted by Rectory Homes**

6.13 The surface water pump station will be designed by specialists to achieve a maximum pump rate of 2.5l/s. The pump chamber will be fitted with a high level alarm and telemetry. In the unlikely event of pump failure, the pump station unit will provide approximately 33m<sup>3</sup> of additional emergency storage, calculated based on the guidelines in Sewers for Adoption. This emergency storage is independent of the attenuation storage

provided in the surface water drainage strategy.

Wilstone has frequent power cuts all year round mostly due to overhead power cables requiring a lot of maintenance, especially in stormy weather. If I recall we had six between Jan-Feb 2018. What is in place should there be a power cut? UK Power Network I'm sure can provide the frequency of power cuts. How noisy will this surface water pump be?

### **Maintenance for drainage**

6.22 All of the proposed SuDS and drainage networks within each plot will be the responsibility of the future owners. The surface water pumping station will be the responsibility of a private management company, if it is not formally adopted by the local sewer authority.

Table 1 shows the maintenance schedule to manage the drainage features within the development.

Table 1: SuDS Maintenance Schedule Drainage Feature Inspection and Maintenance Frequency Permeable pavements brushing surface to remove detrimental materials such as debris, dirt and sediment.

Annually Stabilise / mow adjacent verges, and remove weeds from surface. Occasional (as required) Ensure paving dewaterers aUer rain and between storms as required Rehabilitate super-structure.

Occasional (every 10-15 years) Cellular storage tank\* Ensure inlets and pre-treatment structures are clear and free of debris.

Annually Flow control structure (Hydrobrake or similar)\* Inspect and remove any sediment / debris. Annually Inspect flows controls and repair as necessary.

Occasional (as required) Hardstanding areas Sweep regularly to prevent silt being washed off the surface. Frequently Gulley's Inspect and remove any sediment / debris. Annually

Maintenance will be the responsibility of the home owner, but there is no guarantee that this will be carried out. Who will monitor this?

### **Affordable Housing**

I understand the concept of affordable housing discounted at market value. There have been homes in the village for sale which would have been affordable to first time buyers in the Long Row between £285-350K over the past year which were withdrawn from sale due to a lack of interest. You could say they were reduced from the original market value and still remained unsold. There is currently a two bed for sale at £325k and a good example of a help to buy is the three new cottages in the heart of the village x 3 bed, two remain on the market since October last year at £450k and mid terrace at £425k, There is also a four bed family home in Grange Road under £400k and a family three bed on Tring Road which has been on the market for the majority of 2018.

I don't believe these houses will be affordable to any young people locally.

Prices in Wilstone are generally high. In Pitstone which is a few miles away, you can purchase a brand new three bed detached home for £435K and Aylesbury which is rapidly developing is more affordable to a first time purchaser in respect of far more property for your money.

### **Concerns**

Onsite investigations have established that a high water table exists on the site being as high as 1.1m below ground level in places. Consequently, this makes it difficult to achieve a 1m unsaturated zone required with an infiltration drainage solution, without significant design modifications such as raising finished floor levels across the site

My concern is our bungalow is not constructed above floor level, how will the additional surface water affect our property? I

### In the unlikely event of planning being granted

- Hoarding to be run the whole length of our boundary fence to decrease noise and dust.
- New T junction into the development to be created before build starts for HGV deliveries and parking for trades.
- Agricultural gate to be blocked before building commences. (no deliveries or access through this gate)
- Semi-detached two story house to be moved further away from our boundary fence due to over shadowing and visual intrusion. Properties along this side of Tring Road are at different forward facing levels, so technically could be moved forward so it does not run alongside our property.
- Deliveries restricted to between 9-3pm to safeguard the children going & coming from school, due to lack of pavements in the village.
- Trees that border our property that run alongside our garage to be removed as land owner is responsible for this boundary. Heavy machinery currently cuts back these trees annually.
- New wall/closed board fencing to be erected on development completion the length of our garden from Tring Road boundary to the end of our garden boundary. (our deeds state land owner responsible for fencing)
- The proposed pedestrian entrance that runs alongside the other side of our boundary hedge to be relocated. Currently it would be in very close proximity to our bedroom window.
- New pedestrian pavement to be built from Grange Road to the canal bridge, either by setting back the hedge or engineering of the gully. Or on the opposite side of the road along with traffic light pedestrian crossing. This would connect the homes from Wilstone Wharf and also the other two properties over the bridge. Also residents from Dixon's Gap could access this path from the canal footpath weather permitting.

<p>Goodspeeds, Watery Lane</p>	<p>The community has a planning meeting arranged for 24 February 2019 - all developers with plans for Wilstone have been invited to show how their development meets our recent housing needs survey. The fact that we have to submit our comments before this date (30 Jan) means we have no opportunity to assess this against other opportunities within the village. I would ask that a decision on this plan be delayed until after 24 February. I have asked TRPC to support this request. If this cannot be done however, these are my initial comments.</p> <p>a) this development appears to be outside of the village boundary and on an agricultural field. Therefore I would not have thought this a suitable location for development.</p> <p>b) it does not meet the needs of our Housing Needs Survey (20% below market value is not sufficient for affordable housing, nor is the mix what has been development).</p> <p>c) Access is along a dangerous road that does not have a footpath.</p>
<p>2 The Mill</p>	<p>This speculative application must be refused.</p> <p>Reasons:</p> <ol style="list-style-type: none"> <li>1. Overdevelopment of rural location.</li> <li>2. Road safety - the site is on a blind bend near a canal bridge, totally unsuitable for access.</li> </ol>