

4/03441/15/MFA - DEMOLITION AND REPLACEMENT OF A 4 STOREY OFFICE BUILDING WITH 16 STOREY RESIDENTIAL DEVELOPMENT. FEATURING 272 APARTMENTS, ON-SITE GYM AND LEISURE FACILITIES, ON-SITE COFFEE SHOP, ROOF GARDEN, INTERNAL ARBORETUM, FUNCTION ROOM AND UNDERGROUND PARKING FACILITIES FOR 313 CARS IN AN AUTOMATIC CAR PARKING SYSTEM, WITH ON-SITE ELECTRIC CAR SHARE AND ELECTRIC BIKE SHARE SCHEME.

PLEASE NOTE THAT THIS RE CONSULTATION APPLIES ONLY TO THE SURFACE WATER DRAINAGE STRATEGY - LISTED ON THE WEBSITE AS ADDITIONAL INFORMATION 3/3/2016 1..

SYMBIO PLACE, WHITELEAF ROAD, HEMEL HEMPSTEAD, HP3 9PH.

APPLICANT: CORONA PROPERTIES.

[Case Officer - Briony Curtain]

Summary

The application is recommended for approval.

The principle of the redevelopment of this site for mixed use and residential purposes is acceptable in accordance with Policy CS4 and CS17 of the adopted Core Strategy. In addition, outline planning permission has already been granted for a mixed use 16-storey building. The principle of the development has therefore already been established.

The proposals are in accordance with the relevant aspects of the NPPF and the Development Plan and there are no impacts of the development that are unacceptable or cannot be appropriately mitigated. As such there are no sound planning reasons to refuse the proposal.

The applicants have engaged pro-actively with the Local Planning Authority and the scheme has been adapted to take into account the comments received and concerns raised in order to achieve an acceptable development on the site.

Outline planning permission was granted in June 2015 for a 16-storey mixed-use building of 59.3m in height. This is a material consideration that must be afforded significant weight in the determination of this application. It is however important to note that all matters, other than the principle and the means of access remain reserved. A reserved matters application finalising the detail has not yet been assessed.

The current scheme proposes a 16-storey mixed-use building of slightly greater height at 66.15m, and is a **full** application; as such all matters and details must be fully considered not just the principle and means of access.

For comparison, a table summarising the approved outline scheme and the current proposal will be presented with the plans.

The area has previously been identified as a gateway site into Hemel Hempstead where there is justification for a taller building. Despite the slight increase in total height compared to the outline approved scheme, the development would not have any further impacts on skyline views across the nearby Boxmoor Trust land or surrounding Green Belt countryside compared to the previously approved scheme. The proposal represents an efficient use of land and is a sustainable location for development in walking distance to the train station, local bus stops and the town centre. The increased amount of units has been achieved by reorganising the internal layout and losing employment. Generally the efficient use of land is welcomed in this location. The development and its location would provide an acceptable standard of amenity for residents within the building and would not significantly adversely affect the amenity of nearby sensitive uses including the closest residential properties. The proposal would not raise any objections with respect to the strategic aspirations for the Two Waters

General Employment Area, and would be acceptable within the site's key gateway location. It would not have a significant adverse impact on the character or appearance of the wider area.

Specialist Highway advice has been sought with regard to the impact of the proposed development in terms of highway capacity and safety. Given the scale of the development proposed, the automated parking system being used, and its position at an already very busy intersection, further evidence was sought that the development would not adversely impact on the adjacent roads of Whiteleaf Road, London Road and beyond. Additional information has been provided and Herts County Council Highways now recommend conditional approval. The Highway Authority raises no objections to the scheme subject to the imposition of conditions and the introduction of highway improvements at the Two Waters Road /London Road signalised junction (secured by legal agreement).

The site lies close to local services and bus stops and within walking distance (1000m) to the train station. The parking provision falls within the adopted maximum guidelines set out by both Local Plan policies and National Guidance. The ratio of parking spaces to floor space has improved from the earlier outline approval (primarily due to the loss of the office floor space). It is considered that the proposed parking provision and arrangements are adequate in this location. The Automated parking system proposed boasts a number of environmental benefits compared to the underground parking in the consented scheme. The provision of a Green Travel Plan including measures to promote the use of sustainable forms of travel (secured by legal agreement) would assist in reducing the impacts of the development on local highways. It is also proposed to introduce shared car and cycle schemes.

The provision of a financial contribution of £5,000,000 towards affordable housing and community infrastructure provisions would be provided.

The Environment Agency and County Council as Lead Local Flood Authority are satisfied with the submitted Flood Risk Assessment and Surface Water Drainage Strategy.

In this respect the proposal is in accordance with Policies NP1, CS1, CS4, CS8, CS9, CS10, CS11, CS12, CS15, CS16, CS17, CS18, CS19, CS29, CS 31, and CS32 of the Dacorum Core Strategy (September 2013) and saved Policies 13, 18, 31, 51, 58 and 111 of the Dacorum Borough Local Plan 1991-2011.

For the reasons referred to above the proposals are considered to be acceptable subject to a legal agreement and conditions.

Site Description

The application site comprises a four-storey detached building currently occupied by offices (Class B1) located on the south-eastern side of Whiteleaf Road and within the Two Waters General Employment Area. Land uses in the immediate area, particularly off Whiteleaf Road are varied and outlined in detail below.

Land to the north and east of the site is occupied by Aldi supermarket, accessed off Whiteleaf Road, and located at a prominent corner at the intersection of London Road and Two Waters Road. Further north opposite London Road, a wide two to three lane main road, is open land owned by Boxmoor Trust which straddles the River Bulbourne and the Grand Union Canal. Two Waters Road to the east of the site across this section is a two-way, six lane thoroughfare leading to Hemel Hempstead town centre. Opposite Two Waters Road is the continuation of the Two Waters General Employment Area and the recently constructed self storage building.

To the south of the application site is Arriva bus depot which is also accessed at the top of Whiteleaf Road. Beyond this is the mainline railway line and opposite is land within the Green Belt.

Immediately west of the site is Whiteleaf Road a wide two-way two-lane road which offers no on-street parking. Directly opposite there are low profile buildings of commercial use on a lower terrace forming part of the Chancerygate Business Park. These units share private and communal parking areas via a single access off Whiteleaf Road. Further west is land designated for residential development and the closest existing residential properties on London Road to the north-west of the site.

Buildings within the Two Waters General Employment Area are generally low profile, predominantly two-storey or double-height with mezzanine level. The Chancerygate Business Park on the western side of Whiteleaf Road is arranged on three stepped terraces, consistent with the topography of the area. Specifically, the land rises steadily from London Road to the north of the site and up along Whiteleaf Road in a south-westerly direction.

The site is one property removed from the busy intersection of Two Waters Road and London Road which connects off the A41 bypass, separated only by the low rise Aldi supermarket building and associated open car park. The site's elevated position from London Road and the northern part of Two Waters Road (specifically south of the bridge over the Grand Union Canal) give the site a prominent position from these vantage points.

Proposal

Full Planning permission is sought for a 16-storey building comprising two floors of mixed use and 14 floors of residential accommodation in the form of 272 dwellings (flats), and basement automated car parking over 6 levels (three floors each with a double rack system).

The proposed development includes;

- 131 one bed flats (including 12 studio flats)
- 115 two bed flats
- 26 three bed flats
- 318 car parking spaces

On the ground floor there would be coffee shop / cafe, and a function room for use by residents only and a gym for residents use on the first floor. The building proposes to incorporate high levels of sustainable technology including the use of Solar Panels, external triple glazing, a ground source heat pump, a glass atrium, a roof garden (green roof), rain water harvesting system and internal arboretum. Following objections from the Met Office the two wind turbines (which formed part of the original submission) have been omitted from the proposal.

The car parking is proposed to be automated. Automated Parking is described (in the Design and Access Statement) as being ' a mechanical valet parking system where the driver exits the car and it is parked automatically'. In an automated parking system, a user drives their car into an allocated loading bay. The driver exits the car, which is then parked automatically by the conveyor and robotic system into a car system underground. The car is then retrieved by use of key or code and delivered back to the ground floor loading bays / waiting bays in laybys. No user enters the parking area at basement level. During the course of the application the ground floor plan has been amended to include the introduction of a lay by area with 8 waiting bays. It is also proposed to incorporate a shared car and cycle scheme. 318 parking spaces are provided for 272 units.

Referral to Committee

The application is referred to the Development Control Committee at the request of the Assistant Director

Relevant Planning History

The application site has been the subject of several planning applications in recent years. Of most relevance are the outline planning consent for a 16-storey mixed use building comprising 208 dwellings and the Office Prior Approval consent that permits the change of use of the existing building from offices to 17 flats.

- 4/01761/15/RES RESERVED MATTERS APPLICATION DETAILING ACCESS, APPEARANCE, LANDSCAPING, LAYOUT AND SCALE REQUIRED BY CONDITION 1 OF PLANNING PERMISSION 4/02320/14/MOA (CONSTRUCTION OF 16-STOREY AND FOUR BASEMENT LEVEL BUILDING COMPRISING OF UP TO 208 FLATS, OFFICES, RETAIL, LEISURE SPACE AND 228 CAR PARKING SPACES FOLLOWING DEMOLITION OF EXISTING OFFICE (CLASS B1) BUILDING (ALL MATTERS RESERVED).
Withdrawn
27/10/2015
- 4/02561/15/VAR VARIATION OF LEGAL AGREEMENT - pending approval
- 4/02320/14/MO A CONSTRUCTION OF 16-STOREY AND FOUR BASEMENT LEVEL BUILDING COMPRISING OF UP TO 208 FLATS, OFFICES, RETAIL, LEISURE SPACE AND 228 CAR PARKING SPACES FOLLOWING DEMOLITION OF EXISTING OFFICE (CLASS B1) BUILDING (ALL MATTERS RESERVED)
Granted
26/06/2015
- 4/01044/14/OPA CHANGE OF USE OF OFFICE DEVELOPMENT (CLASS B1) TO 17 RESIDENTIAL UNITS (CLASS C3)..
Prior approval required and granted
15/07/2014
- 4/00613/14/MFA CHANGE OF USE FROM OFFICES (CLASS B1) TO A 38-BEDROOM HOTEL (CLASS C1), INCLUDING CONSTRUCTION OF SINGLE-STOREY FRONT AND SIDE EXTENSIONS TO FACILITATE ANCILLARY RESTAURANT AND SWIMMING POOL, ALTERATIONS TO CAR PARK AND ASSOCIATED LANDSCAPING
Refused
05/06/2014
- 4/02161/13/FUL INSTALLATION OF FOUR VERTICAL AXIS WIND GENERATORS
Withdrawn
20/01/2015
- 4/01388/12/FUL DEMOLITION OF REAR SINGLE STOREY EXTENSION AND CONSTRUCTION OF TWO STOREY REAR EXTENSION, INTERNAL AND EXTERNAL ALTERATIONS ADDITIONAL CAR PARKING/LOADING BAY AND CREATION OF TERRACE AT SECOND FLOOR LEVEL
Granted

07/09/2012

4/00579/12/FUL DEMOLITION OF REAR SINGLE STOREY EXTENSION AND
CREATION OF ADDITIONAL CAR PARKING. INTERNAL AND
EXTERNAL ALTERATIONS WITH CREATION OF TERRACE AT
SECOND FLOOR LEVEL.

Granted
23/05/2012

4/00587/12/ADV TWO INTERNALLY ALUMINATED FASCIA SIGNS AND ONE FREE
STANDING SIGN.

Granted
17/05/2012

4/00920/06/TEL C

Prior approval not required
20/06/2006

4/00609/01/ADV ILLUMINATED SIGNS

Granted
10/05/2001

4/02109/99/4 NEW CLADDING, ENCLOSURE OF ENTRANCE LOBBY AND NEW
GROUND FLOOR WINDOW

Granted
27/01/2000

4/01141/96/4 NEW SECURITY FENCE

Granted
28/10/1996

Policies

National Policy Guidance

National Planning Policy Framework (NPPF)
National Planning Policy Guidance

Core Strategy (Sept 2013)

Policies NP1, CS1, CS4, CS8, CS11, CS12, CS14, CS15, CS16, CS17, CS18, CS19, CS23,
CS25, CS28, CS29, CS31, CS32, CS33, CS35

Dacorum Borough Local Plan 1991-2011 (saved policies)

Policies 13, 21, 31, 33, 37, 44, 51, 57, 58, 76, 111
Appendices 1, 3 and 5

Supplementary Planning Guidance / Documents (saved)

Environment Guidelines (May 2004)
Water Conservation & Sustainable Drainage (June 2005)
Energy Efficiency & Conservation (June 2006)
Accessibility Zones for the Application of car Parking Standards (July 2002)
Planning Obligations (April 2011)
Affordable Housing (Jan 2013)

Summary of Representations Received - (full consultee responses are provided in an appendix).

Hertfordshire Waste and Minerals

Additional information requested / conditions recommended
Notwithstanding the submitted documents a detailed Site Waste Management Plan is requested.

SWMP received 10/12/15

The SWMP is a live document that evolves with the development. The template submitted has been assessed and overall is specific to the requirements of the development. It is advised that some important elements are updated prior to operation. Recommend conditional approval requiring additional detail and that the SWMP is implemented in full.

Environmental Health – Noise

No objection - do not wish to restrict the grant of permission.

Archaeology

Recommend conditions be applied if consent granted;
Site is located in Two Waters, evidence from historic maps shows a site of a Malthouse within the site bounds. Given this and its topographical position, the development site does possess the potential for the presence of heritage assets with archaeological interest. It is therefore requested that conditions be attached to any consent.

Contaminated Land Officer

Recommend Standard Conditions be applied if consent to be granted.
With regard to Air Quality it is recommended that a condition be attached requiring the implementation of the mitigation measures outlined in the submitted reports.

Crime Prevention Officer

Concerns overcome / addressed - recommend conditions

Amended comments:

- Postal Delivery - via reception to staff (mon-sat) and communal post boxes in reception area which are covered by CCTV. Queries satisfactorily answered.
- Access Control - access control for the whole building was discussed, security standards for communal doors, video entry phone systems and the provision of CCTV. Queries satisfactorily answered.
- Car Parking - Concerns over peak time demand were discussed. It was suggested that this would be managed by staff who would assist. The barrier arm and ANPR would be positioned at the entrance to the vehicle garage. The points were noted but concern remains and it is left with the LPA to resolve any issues (Herts County Council Highways advice sought and following amendments are satisfied with peak demands)

- Cycle Storage - there is provision for cycle storage which would cover a range of sizes and be accessible to all users. Queries satisfactorily answered.
- Studio Flats - discussed and any decision is left to the LPA (National Planning Policy Framework refers Local Planning Authority's to Nationally Described Space Standards).

Original Comments

Advice was received regarding Security, Postal Delivery, Access Control, Car Parking, and cycle storage. The following concerns were raised;

- Postal Delivery - proposed postal system has only partially been explained. If communal post boxes are proposed these must be covered by CCTV to prevent theft.
- Access Control -
 1. pleased regarding access control to communal external doors. Maglocks are stated but not to which standard. Each flat must have a video entry phone to the external communal entrance.
 2. access control must be to stair cores as well as lifts
 3. more widespread CCTV is required to cover ground floor communal areas, post boxes and the area where vehicles are dropped off and collected.
- Car Parking - concern over how automated system would work.
 4. Underground parking area must be secure (a barrier arm would not suffice)
 - concern over entrance/ exit to car park during peak times
- 5. Cycle Storage - no cycle storage provided
- 6. Studio flats - no bed shown on plans, presumed a fold-out bed?

Lead Local Flood Authority

Amended Drainage Strategy

NO OBJECTION - A further surface water drainage strategy has been provided - Recommend Conditional Approval

Original drainage strategy

OBJECT

In the absence of an acceptable surface water drainage assessment, we object to this application and recommend refusal of planning permission until a satisfactory surface water drainage assessment has been submitted.

Affinity Water

NO OBJECTION - Recommend conditions be attached to any consent

Site is located within a groundwater Protection Zone (GPZ) for Hunton Bridge Pumping Station. This is a public water supply. The construction works should be done in accordance with the relevant British Standards and Best Management Practices to reduce groundwater pollution risk. If pollution is found then appropriate monitoring and remediation methods will need to be taken.

Thames Water

Subject to suggested conditions NO OBJECTION;

Waste Comments

An impact study is requested to confirm the extent of any network reinforcement required. A 'grampian style' condition requiring a drainage strategy is requested.

Thames water requests that a non-return valve or other suitable device be fitted to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge

during storm conditions.

It is recommended that petrol / oil interceptors be fitted in all car parking / washing/repair facilities.

No impact piling shall take place until a method statement has been submitted.

Water Comments

water supply in this area is covered by Affinity Water,

Environment Agency

NO OBJECTION - Recommend conditions

Condition 1 - require pre-commencement risk assessment and site investigation

Condition 2 - verification report completing remediation measures

Condition 3 - remediation strategy if new contamination found during construction

Condition 4 - no piling or foundation designs using penetrative methods shall be permitted without express written permission, which may be given where it has been demonstrated that there is no resultant unacceptable risk to groundwater.

condition 5 - no investigation boreholes and ground source heating using penetrative methods shall be permitted without express written permission, which may be given where it has been demonstrated that there is no resultant unacceptable risk to groundwater.

Condition 6 - no infiltration of surface water drainage into the ground shall be permitted without express written permission, which may be given where it has been demonstrated that there is no resultant unacceptable risk to groundwater.

Condition 7 - require long term monitoring and maintenance plan

Ministry Of Defence

NO OBJECTION

The proposed application falls within the safeguarding consultation zone surrounding the meteorological radar site at Chenies. The MOD no longer represent the Met Office for the safeguarding of this site. Therefore, we have no safeguarding concerns.

Met Office

Amended Plans (omission of wind turbine);

NO OBJECTION now that amended plans have been received removing wind turbines as these may have interfered with MET office weather radars.

Highways England

No objection

Hertfordshire County Council Highways

Additional Traffic Assessment;

NO OBJECTION. HCC is satisfied that the applicant has met all the concerns raised in the original recommendation for refusal. It is now recommended that permission is granted subject to conditions, financial contributions and highway improvements.

Conditions;

- Car and Cycle Parking Management Plan
- Green Travel Plan
- Visibility Splays
- Construction Management Plan
- Wheel Cleaning Facilities

Financial Contributions;

- Canal Towpath and Pedestrian Links - £75,000

Highway Improvements;

- KEEP CLEAR Road Markings in front of Whiteleaf Road on London Road
- optimise the operation of the existing SCOOT (Split Cycle Offset Optimisation Technique) traffic light computer control system
- Introduce MOVA (Microprocessor Optimised Vehicle Actuation) software at the Two Waters Road / London Road signalised junction

Original Traffic Assessment

OBJECT;

Recommend Refusal due to lack of information. Two areas of concern relating to impact on highway safety and capacity; the methods used in the Traffic Survey are not accepted (junction modelling is required in place of the submitted gap analysis) and the efficiency of the APS to safely, process peak period demand without vehicles queuing onto Whiteleaf Road.

Strategic Planning

The site is situated within a General Employment Area. However, it is clear that emerging national policies seek to boost housing supply per se, to promote the use of employment / commercial land for housing wherever possible and to redevelop brownfield land. The prior approval process already sanctions the loss of existing office floor space (albeit through conversion) under 4/01044/14/OPA. The Government is also committed to extending these rights to allow for the demolition of office buildings and new building for residential use. Given the above, we do not wish to object to the omission of the office floor space in the revised proposal.

Herts Design Panel

The new proposed development fills the site in the form similar to a guitar spectrum with a void in the centre for circulation. The Site Plan ref BEA_DWG003_V3.5 is misleading in that it fails to show the extent of the apartments above the ground floor adequately. The proposed building has virtually no open space on the ground floor. The elevations are predicated on ribbons of triple glazed fenestration wrapping round the building shaded by visor like pv panel clad projecting eaves. The sustainable credentials of the scheme are unclear as there is inadequate information about the performance of thermal mass and proposed renewable systems. The fact that the design of the elevations does not respond to the changing orientation around the site undermines its sustainable credentials. The Case officer advised that the proposed wind turbines have been omitted from the application and that an Automatic Car Parking system with laybys for 8 cars has been put forward. It is not possible from the drawings submitted to see how laybys for 8 cars can be accommodated on the site. It is a concern that there are no window openings shown onto the inner core and that some of the apartments have limited views from the main living areas, particularly the 3 bed apartments on the north side overlooking the main views across Boxwood Meadow.

The current proposals 4/03441/15/MFA for 278 apartments is significantly different to the mixed use consented outline application (4/02320)14/OUT comprising 208 flats, offices, retail, leisure spaces and 228 car parking spaces.

The number of flats in the revised design has increased by about a third to 272 units and the fact that this is now a single use building means that the ground floor is not animated or connected to the surrounding street scape. There are significant concerns about access into the site and its detail design. The scheme would benefit greatly if the developers and designers were given an opportunity to present their proposals to a full panel and local authority officers.

As this is such a significant site the local authority may wish to consider developing a master plan for the immediate surrounding area so as to provide a holistic strategy for regeneration of

this gateway into Hemel Hempstead.

Environmental Sustainability Officer

NO OBJECTION - sustainability credentials proposed are achievable on this site.

Woodlands Officer

NO OBJECTION - with regard to balcony boxes these would be suited for annual planting, spring bulbs, or even some vegetables but not permanent planting of woody plants

Response to Neighbour Notification / Site Notice / Newspaper Advertisement

133 individual representations have been received, (128 against, 5 in support) and a petition of 55 signatures against the proposal. These representations relate to the original submission and the additional / amended information and plans.

The comments of support are summarised below;

- these are exactly what first time buyers need, there are hardly any properties for sale in Hemel in the lower price range
- this development asserts ground-breaking features that will attract high quality residents and add a modern, innovative and attractive tower to the town, the height of the tower is too low and would act as a counter-point to the KD tower
- the design is attractive and striking, would be iconic and a visual improvement to the town
- the town needs more properties and this is a good opportunity to provide this without the eyesore and intrusion that would be caused by building a similar number of properties at ground level
- whilst Hemel needs affordable housing it needs to not become a ghetto for the low income. A balance needs to be struck,
- there are few opportunities in the town to create nearly 300 homes, this needs to go ahead to keep up Hemel's tradition of modernisation, innovation and development.
- Hemel needs a landmark, futuristic building with a unique feature to 'put it on the map'

The concerns and objections raised are summarised below;

Principle

- Hemel Hempstead is already earmarked for a large number of new homes. The infrastructure will not support any more large schemes
- the town needs family homes not 1-bedroom flats

Scale

- Overdevelopment - a very large number of flats on a small plot of land
- history has shown that high-rise is not successful
- this high density development is inappropriate in this location, and this is supported by the councils redevelopment documents (circa 2011) which recommend a number of low rise town house style properties in this location which could be supported by the local infrastructure
- the development is completely out of scale with everything in the area

Design and Appearance

- Visual Intrusion - such a high building will detract from the valued, historic open space of Boxmoor
- this tower block would be an eyesore, and completely out of keeping with the rural area
- Many residents have grown up with the Kodak Tower but that doesn't give license to build

a similar tower at the entrance to the town

- the proposal is poorly designed and the materials and appearance will look terrible over time. The planters running around all sides will not work on the north facade and will not be maintained so will look terrible.
- They have proposed continuous bank of solar panels which when the sun is out will cause a blinding hazard due to their reflectiveness. The panels on the north and east elevations will have no benefit at all to the environmental strategy and will be unaffordable for any developer to install. Who will clean and maintain these?
- Architects stopped putting fake wind turbines on buildings as the benefit of these in terms of an energy strategy are non-existent.
- The proposal is weak in terms of design and concept.
- The proposal would represent a dominant feature over surrounding properties
- A building of this size would impact on the skyline
- If allowed, it would set a precedent for further high rise developments
- would give a bad first impression of the town - the area already looks like an industrial estate with the self-storage building

Highways/ Parking and transport

- Traffic and parking in this location is already a huge problem with congestion, especially at peak times and this has been exacerbated since the recent opening of Aldi and the construction of the Bovis estate
- Whiteleaf road is already congested with cars and buses and people already have to queue to turn into the road due to Aldi. The traffic associated a development of this scale would be dangerous at this point on the highway network
It is already impossible to drive between Boxmoor and Apsley at the weekend, the development would worsen this
- There is insufficient parking for residents meaning further pressure on parking in the local area
- The already crowded commuter trains will become worse
- There is no provision for visitor parking,
- The traffic assessments is severely flawed as it doesn't include Fridays, Saturdays or Sundays when the traffic in the area is grid-locked
- The car share scheme is a nice idea but will not stop people using their own cars
- The parking system is flawed as it doesn't allow enough time for residents to enter / leave the site
- Pedestrians already feel vulnerable walking along the narrow footpath from the site to the train station
- Parking restrictions have recently been implemented for Boxmoor residents. Most families have more than one car - where will these park
- The traffic assessment has huge omissions and inaccuracies (see detailed comments in appendix)
- The congestion and traffic from this development will delay the buses using their depot further up the hill affecting all services
- 313 cars will cause pollution to the residents and local wildlife
- In previous applications the site was acknowledged as not considered to be particularly sustainable or accessible to alternative modes of transport and this demonstrated by the fact it lies outside Zone 3
- The traffic assessments were undertaken before Aldi was opened
- There is no evidence to suggest the car share scheme will reduce car ownership
- The data used in the Traffic Assessment is inconsistent and inaccurate
- The skyline parking design guide states that the system should NOT be used "where there is a very high peak in car demand over a very short period of time". APS are a good idea in the right circumstances but not for large residential developments, such as this, because

they are not quick enough to keep up with peak demands.

- A car parking management plan should be submitted for assessment before consent is granted not after.
- The APS claims it processes cars on 60 seconds. This is only possible in a well-designed system. There has been no account for the layout design proposed which has only 2 entry/exit points meaning one transporter unit would interrupt the other while moving cars. there has also been no account for double parked cars
- There is no time restriction for loading and unloading and this will cause delays and queues.
- There is enough stacking space for 10 cars but using their own data in the TA there could be another 20 cars tailing back onto Whiteleaf Road
- Will be parking provision be able to accommodate vans and larger vehicles as this is a problem at the KD tower site
- The APS is designed by a Swiss company with no other installation in this country - who will maintain it?
- Only 5 of the 313 parking spaces are allocated for electric vehicle charging all of these spaces are allocated to a shared use scheme. This seems short sighted as government aims by 2040 that all new cars sold in the UK would be ULEVS. It would be almost impossible to retrofit charging facilities to the APS as the car cannot be accessed once parked. In contrast normal multi-storey car parks can be adapted. It is not very green to force residents to buy petrol cars because there is no way to charge them.

Affordable Housing

- The development does not fulfil the council's targets for affordable homes the developer has provided amenities within the development to increase the service charges making it impractical for local housing associations to take up the units.
- Only 18% affordable homes
- There is no excuse for development which circumvents the rules on affordable housing

Residential Amenity

- Its height will undoubtedly impact on the privacy of local residential properties
- There are a number of residential properties that would lose privacy to their gardens and bedrooms
- It is too high and will overshadow adjacent properties
- Families need houses with gardens, where children can play
- Noise and disturbance while building this development would be tremendous

Other Matters

- How will rubbish and recycling be collected?
- This and other applications on the site have been poorly advertised and consultation not widespread enough
- Is there data for what happens when you drill to 16-storeys on a chalk bed - there are already sink holes.
- The site is opposite Boxmoor Trust Land, which is a designated SSSI due to its rare flora - has an environmental study been undertaken?
- What due diligence is completed by the council with regard to the company proposing this development? Symbio have never actually completed a project of this scale - what plans are in place to protect the area should this development fail or not comply with regulations?
- Schools and medical services are already at breaking point
- Underground parking will cause further flooding in an area that already floods after heavy rainfall
- The design and access statement contradicts itself and cannot be relied upon to make a

decision

- The site may provide a gym, but Hemel already has one of the best sports centres for miles around
- The plans submitted bear the logo 'lumiere designs' who were involved in a similar mixed-use skyscraper in Leeds, which was cancelled. Potential buyers had to wait years to get their deposits back.
- The river Bulbourne is a rare chalk stream and listed internationally as a priority habitat for restoration. Boxmoor trust and the env agency are working on projects to restore this, yet this development wants to build an underground car park. What impact will this have?
- The flats in the KD tower took years to sell as there was no demand for them, so despite the developer trying to sell a lifestyle, the flats will sit empty and unaffordable

Considerations

Policy and Principle

The principle of the development has already been established through the granting of outline planning permission for a 16 storey mixed use building in June 2015.

The main policy issues relevant to this current application include the importance of the site within this particular employment area, the loss of the office space, the appropriateness of the mix of uses, and the relationship with existing uses in the area.

The application site is located in the Two Waters General Employment Area within the town of Hemel Hempstead. In such locations, Policy CS15 of the Core Strategy seeks to protect B-class uses including the site's existing office use (Class B1). Saved Policy 31 of the Local Plan sets out the proposed employment uses of this General Employment Area which include business, industry, storage and distribution.

The principle of a mixed-use (predominantly residential) building in this location has been accepted through the granting of outline planning permission. In granting consent for that scheme emphasis was placed on the fact that 830sqm office use was to be retained. There is no office use as part of the current proposal. This results in a net decrease of 1640 m² office space compared to the existing building on the site, and 840sqm compared to the approved scheme.

Although the loss of office space within the General Employment Area would be contrary to Policy CS15, consideration must be given to recent consents allowing the conversion of the entire building to residential through the recently introduced prior approval process (application 4/01044/14/OPA). In addition, as outlined in the comments of Strategic Planning, current and emerging national planning policy seeks to boost housing supply per se, and promote the use of employment land for housing wherever possible. The prior approval process already sanctions the loss of existing office floor space (albeit through conversion) to residential uses. The Government is also committed to extending these rights to allow for the demolition of office buildings and their replacement with residential buildings (avoiding the need for separate applications for planning permission for the works necessary to redevelop office sites). These factors would weigh heavily in favour of the proposal.

On this basis, despite the loss of the office floor space, the proposal retains the support of the Strategic Planning team and no objection is raised to the total loss of the office floor space. The proposal would not conflict with the overriding objectives of Policy CS15 of the Core Strategy or saved Policy 31 of the Local Plan.

This part of the Two Waters General Employment Area is made up of a mix of land uses. Light industrial and storage and distribution uses occupy land on the western side of Whiteleaf Road (forming the Chancerygate Business Centre), whilst the eastern side of Whiteleaf Road,

(where the application site is located), comprises office development, a former car showroom recently developed as an Aldi supermarket, and the Arriva bus depot. Based on the variety of uses in this part of the Two Waters General Employment Area, a mixed use building of the nature proposed would not conflict with surrounding uses, and would not undermine the function of the Employment Area.

Additionally, the Two Waters General Employment Area has been considerably reduced in size as part of the Site Allocations process, of relevance is the removal of the adjacent Aldi supermarket site and the National Grid site to its western edge. Reference is made to Policy SA5 of the Site Allocations 2006-2031 Written Statement (Pre-submission September 2014). The redesignation of these two sites gives the application site a location at the edge of the centre, which weighs in favour of the proposal for a mixed use, predominantly residential development.

The main use within the development would be residential, with residential units occupying 14 and a half storeys of the proposed building. The NPPF states that housing applications should be considered in the context of the presumption in favour of sustainable development.

The proposed residential development would be relatively isolated from existing and designated residential areas, with the nearest residential area located on the National Grid site to the west (not yet developed) and existing dwellings on London Road to the north-west of the application site. This is not considered to be problematic given the number of dwellings and the services that would be available to residents within the proposed building, including a gym, cafe, function room and roof terrace.

The proposal would strengthen the existing five-year supply of deliverable housing sites within the Borough, and would reduce pressure to develop on Green Belt sites by ensuring non Green-Belt sites such as this are developed efficiently.

The proposal is considered acceptable in principle and would comply with the relevant policies of the Dacorum Core Strategy.

Density

Saved Policy 21 of the Local Plan provides specific guidance for expected residential densities to be within the range of 30 to 50 dwellings per hectare. The policy goes on to state that higher densities will generally be encouraged in urban areas at locations where services and / or workplaces can be reached without the need for motorised travel or which are well served by passenger transport.

The proposal would result in a density of 1251.7 dwellings per hectare (based on 272 dwellings on a plot size of 0.2173 hectares). Whilst significantly higher than expected levels, the site's location close to the town, within walking distance of the train station and open space and within a General Employment Area gives it an ideal position proximate to workplaces. In addition a mix of uses are proposed within the building itself which would contribute to employment within the immediate area. The proposal would also contribute to housing delivery which the Borough needs to provide a minimum of 430 dwellings per year and would reduce pressure for residential development on Green Belt sites across the Borough.

The outline consent granted permission for 208 flats, which amounts to a density of 1,156 dwellings. This clearly exceeds the expected density and must be afforded significant weight in the determination of this application. The principle of a higher density development in this location has already been established. The size of the proposed building is no wider or deeper, the floor plans and layout has been re-designed internally to provide more units.

Given the above factors and the strategic support for the proposal, the residential density, in

isolation, would not raise significant concerns in this particular location. The main considerations in terms of density should therefore be the impact of the additional 64 flats on the amenities and infrastructure of the surrounding area (covered later in report).

Building height and design

The application is supported by a Design and Access Statement and Landscape Visual Impact Assessment (LVIA).

The LVIA satisfactorily demonstrates how the proposed development can be assimilated into the landscape and is appropriate in its overall form, scale and height for its gateway context. Whilst the proposal would represent a considerably taller feature in comparison to surrounding development this would not be harmful to the character of the area. As noted above, the application site forms part of a key gateway location. Policy CS10 (e) states development should deliver landmark buildings at movement and pedestrian gateways. A footnote to the policy notes that landmark buildings are not necessarily defined by their height, but by their distinctiveness due to design and location. This does not however preclude tall buildings. By definition, a landmark building is distinct from surrounding development and in the site's location there is policy support for a building of different appearance and form to surrounding development. Further, Policy SA5 of the Pre-submission Site Allocations Written Statement is relevant and states that within the Two Waters General Employment Area, high quality well landscaped landmark buildings are required fronting London Road and Two Waters Way, given the prominent location on the main approach into the town centre from the A41 bypass and adjacent to Boxmoor. The proposal would break the skyline with the most impact along London Road and the approach from Two Waters Road to the north, noting the prominence of the existing building from the intersection of the two roads. The impact of the proposed building on the skyline would only be appreciated in short views when travelling along a short stretch of London Road, the adjacent Boxmoor Trust land and on Two Waters Road when approaching from the north. The building would be read in the context of Kodak Tower and Hemel Hempstead when viewed from wider areas.

The policy references above would give justification to a building of taller and different form to surrounding development in the site's location, to provide a landmark at a key gateway into Hemel Hempstead town and opposite the open land at Boxmoor. Saved Policy 111 of the Local Plan also permits higher buildings within Hemel Hempstead Town Centre and in other locations provided there is no harm to the character of the area, the character of open land, views of open land, countryside and skylines or the appearance and setting of listed buildings and conservation areas.

Moreover, the principle of a 16-storey building on this site has already been established through the granting of outline consent. This is a material consideration that must be afforded significant weight in the current determination.

The height of the proposed building does exceed that of the outline consent by 6.82m. The outline consent approved a 16-storey high building 59.33m above ground level. In order to maximise solar gain whilst maintaining an acceptable level of amenity and aspect for future residents, each floor of the current proposal has been marginally increased in height. The current proposal remains 16-storeys in height but the overall height now appears at 66.15m above ground level. The building approved at outline stage would have a similar overall visual impact to that currently proposed. The impact of the proposed 6.82m increase in a building of this height in this setting would be minimal.

The Design and Access Statement submitted addresses issues of detailed design. The existing relatively low-level, poor quality, indiscernible building would be demolished and replaced with a building which has been designed to be striking, and modern in its appearance with a commitment to very high levels of sustainability. The sustainability aspirations have led the design process and resulted in 'ribbons of triple glazed fenestration wrapping round the

building shaded by visor like PV panel clad projecting eaves' . Whilst repetitive, with continuous bands of solar panels set against the glazing behind, the building would as a result appear simple and regular in its form. The angle of the solar panels would provide some visual interest and depth to the building.

The building has been designed to be triangular in its floor plan shape with its narrowest point facing north in order to maximise the solar gain and optimise aspect and views for future residents. The centre of the building comprises a full height 'void' that would provide an internal arboretum. The topography of the site, which slopes slightly up to the south, with a large retaining wall set between the application site and the adjacent Arriva depot, has influenced the design, with the ground floor exhibiting the plants areas and car park entrances which would not require any aspect / windows and therefore abut the retaining wall.

The site offers an accessible location with pedestrian and vehicular access off of Whiteleaf Road, and benefits from a location within an employment area, including proximity to an existing supermarket, and other modes of public transport such as buses on London Road and Hemel Hempstead Train Station. The site is also in close proximity to the local centre on London Road to the east of the application site and Hemel Hempstead Town Centre. The development is therefore considered reasonably accessible with the train 1000m to the west.

The proposal has undergone a design desk-top review. Some concerns and design suggestions were raised. .

Concern was expressed that there are no windows onto the inner core of the building and that some of the apartments have limited views from their main living areas. It was suggested that an additional high level window serving the proposed kitchens facing the inner core be introduced where possible but the applicants are not willing to incorporate these. The original plans submitted, with single aspect flats, do provide future residents with an acceptable level of outlook, light and aspect and a refusal could not be sustained.

Concern was also expressed that the ground floor is not animated or connected to the surrounding street scape. This is acknowledged, however, the building itself is set back some distance from the London Road street scene behind the Aldi car park. It also has a reception, cafe, gym and function room which although for residents only will activate the ground and first floor of the building.

As stated, the application site is located within the Two Waters Area. Dacorum Borough Council commissioned the production of a strategic Framework to provide immediate planning and design guidance for the area. The Two Waters Strategic Framework will be used to inform a more detailed master plan for the area. The Framework has agreed by Members and the document must therefore be afforded weight, albeit limited at this stage, in the consideration of planning applications.

The Framework identifies the Two Waters Area as a 'site of strategic significance for the town, acting as a southern gateway'. The application site is located within an area which has been identified as an area of 'key redevelopment opportunity' and an 'area of significant change'. Its position at the A414 and London Road junction suggests 'taller building clusters' are suitable and encourages a higher density. The framework goes on to suggest the need for improving non-car modes of transport and improving walking and cycling routes. Canal towpaths in he area are identified as in need of upgrade.

The current proposal adheres to the principles outlined in the Framework, the site is within an area of 'significant change', wherein taller buildings of a high density would be suitable. The applicants have agreed to a financial contribution of £75,000 (secured via legal agreement) towards the upgrade of canal towpaths and improvements to pedestrian links to the site.

On balance it is concluded that the design proposal delivers an acceptable level of quality whilst allowing the applicants sustainability aspirations to be achieved.

Residential Amenity of Future Occupants

The layout, internal amenity and relationships between the proposed dwellings within the building are all considered acceptable and would comply with Policy CS12 of the Core Strategy. The proposed layout would provide future residents with an acceptable quality of accommodation.

It has been noted that the individual private amenity space provision for the proposed dwellings would be well below the standards expected under saved Appendix 3 of the Local Plan, and whilst a communal roof garden and internal arboretum are provided, these would be small for the number of units sharing them. However, each property (even the studios) would have a balcony which can be used for sitting out on. The site is located immediately opposite, Boxmoor Trust Land, which whilst not private would provide some amenity to residents. In addition, again, the outline consent has already accepted a below standard provision and this must be taken into consideration.

Residents would benefit from other exclusive facilities such as an on-site gym, cafe/coffee shop and a community / function room with projector that can be hired out. The use of these facilities would be subject to a management plan which is to be secured by condition. This would ensure they remain for the benefit of residents in perpetuity.

In the outline scheme, the indicative layouts advanced showed some of the bedrooms and habitable rooms fronting onto the communal hallways / inner core with no defensible space and this were not considered desirable as it would give rise to privacy issues. To address this, the current scheme has non-habitable bathrooms adjacent to the communal areas, or kitchen/dining areas which do not incorporate windows facing the inner core. Whilst this has overcome the privacy concerns of the case officer dealing with the outline consent, it has given rise to concerns over residential amenity and aspect (see design desk-top review comments). Given the comments received, it was suggested that the scheme be amended, where possible, to incorporate high level windows facing the inner core. The inner core of the building incorporates an internal arboretum. The provision of high level windows, would thus provide future residents with some additional aspect / view without compromising privacy. The applicants were not willing to amend the scheme.

With regard to aspect and longer views, given the height of the building, and the topography of the site and surrounding land, the majority of the flats would enjoy a pleasant outlook / aspect. Flats to the northern side would boast views towards Boxmoor Trust land, whilst those to the south over the adjacent railway and road towards the wider countryside beyond. The lower level flats to the South-west would directly overlook the Arriva site to the rear, which is not ideal, however, given the separation distance between the flats and the nearest building of the Arriva site, at just over 10m, some limited aspect would be provided. The higher level flats would enjoy views over the Arriva site to the countryside beyond.

Environmental Health has not raised any issues with respect to disturbance in terms of noise to the residential units as a result of the uses at ground and first floor levels of the proposed building.

Immediately surrounding land uses including the Aldi supermarket, bus depot and warehouses are generally low-level with limited external effects in terms of noise and air pollution. Additionally these uses are controlled by their opening hours which are unlikely to extend into the sensitive late night time periods.

The proposal is therefore in accordance with the objectives of Policy CS12 of the Core Strategy.

Landscaping and Amenity

The proposal is supported by a landscape concept plan which sets out the overall vision of the development. The concept plan comprises indicative details of a roof garden, internal atrium, and planters attached to the external balconies. The types of plants to be used are provided in the plan and commented further on in the Landscape Visual Impact Assessment (LVIA). The balcony planters would grow a range of dwarf culinary herbs, the roof garden would exhibit aquatic and non-aquatic plants, whilst the atrium would comprise hanging plants.

The Woodlands Officer has assessed the proposals and subject to the submission of full landscaping details and a management plan secured via legal agreement is satisfied that the landscaping vision proposed can be achieved. Full details and planting schedules would be required by way of condition and should address the different orientations of the building.

The balcony planters attached to each of the 16 floors, would provide some visual variety to the otherwise regular, linear external appearance of the building. It is important however to balance the desired visual amenity of the planters with the functionality of the Solar Panels. If the landscaping is allowed to grow too much, it would obscure the solar panels and limit their efficiency and performance. The applicant has confirmed that the planters will be managed entirely by the management services company, and no access will be required to the residential flats to undertake maintenance. The external facade will be cleaned and maintained by a 'cradle system' suspended from the roof and this would also be used to maintain the planter. Details of a proposed irrigation system have been submitted in the Sustainable Urban Drainage Strategy.

Full details of the landscaping proposed would be secured by condition and a landscape management plan in perpetuity would be secured by legal agreement.

Impact on Neighbours

Although the building would be 6.82m higher than previously approved a Daylight and Sunlight Assessment has been submitted with the application and demonstrates that the proposal would not have a significant adverse impact with respect to loss of light or overshadowing to the nearest residential properties on London Road located north-west of the application site. Although there are no dwellings currently on the National Grid site, also to the north-west, the application site would be sufficiently sited away from this land so that it would not lead to unreasonable levels of light loss or overshadowing to future residential development in this location.

The BRE also considers offices to be a sensitive land use. The offices to the west of the application site do not have any windows fronting Whiteleaf Road and therefore no windows facing in the direction of the application site. One of the offices located to the west of the application site has a first floor window that appears to serve an office, however this window is angled away from the application site and its location opposite the street and to the west would ensure there would not be any adverse impact with respect to light loss, noting that any additional light loss by the proposal would be limited to early day time hours.

First floor offices to warehouses further west have windows directed to the application site, to the north-west and west. These windows are further still from the proposed development, and any light loss would likely be limited to early day time hours.

All sensitive properties including dwellings and offices would maintain a sufficient degree of outlook from main windows following the proposed development.

It follows the proposal accords with Policy CS12 (c) of the Core Strategy.

Sustainability

A sustainability statement (contained in the D&A Statement) and an Energy Statement via the Council's C-Plan sustainability tool have been submitted as part of the proposal. The applicants have demonstrated a clear commitment to achieve a very high level of sustainability. The development aspires to be emission free and the UK's only Energy Performance Certificate A+ (EPCA+) multi-dwelling building, utilising zero carbon and low carbon technologies. In line with national and local planning policy this approach has to be welcomed.

Within the proposed development, the drive for the building to be as sustainable as possible has dictated many aspects of the design and form. The desire to be totally energy efficient would be achieved through the following measures;

- Internal glass atriums - creating a greenhouse effect within the building keeping radiant heat in.
- Green Roof - covering more than 70% of the total site area
- External triple glazing with U-values less than 0.75 - to reduce thermal emissivity
- Ground Source Heat Pump (4 x 1km boreholes for geothermal) - generates heat and hot water for use in the building
- Solar PV Panels on each level and the roof - generates electricity for use in building
- 2MW geothermal bore hole steam generator - generates electricity for use in the building
- Rainwater is collected on the roof garden and recycled throughout the building as grey water. Water stored in the roof garden tank can be released down the building through a hydro generator in the basement to generate power to supplement the PV panels is required.

These measures clearly comply with Policy CS29 of the Core Strategy and the proposal is acceptable in this respect. The proposed development would deliver sustainable homes which would exceed Building Regulation standards and this has to be welcomed.

Concern has been expressed about the sustainability credentials, the costs associated with them and the weight these are given in financial considerations. The Council's Environmental Sustainability Officer has reviewed the proposals and confirmed that all of measures are achievable on this particular site. Some of the measures proposed would be costly but the applicants have set out a clear commitment to achieving these and have allowed for them in the submitted viability reports. The measures proposed would exceed Building Regulation standards and as such a mechanism for ensuring their delivery would need to be in place.

A condition requiring full details of all sustainability measures proposed and the technologies to be used will be imposed. In addition prior to the first occupation a certificate demonstrating compliance will be required. This would allow the LPA to ensure all measures (even those outside Building Regulations) are fully implemented. In addition if for any reason the sustainability measures are not provided it is considered important that a clause be included in the legal agreement securing a 'deferred' affordable housing payment.

Affordable Housing Provision, and Community Infrastructure Levy (CIL)

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

is CIL Liable.

The Charging Schedule clarifies that the site is in Zone 3; Hemel Hempstead within which a charge of £100 per square metre is applicable to the residential elements of the development. CIL is calculated on the basis of the net increase in internal floor area and amounts to some £2,925,787.

Policy CS19 of the Core Strategy requires that Affordable homes will be provided on sites in Hemel Hempstead for developments of 10 or more dwellings, policy sets out that 35% of the new dwellings proposed should be affordable homes. Further, detailed guidance is provided in the Affordable Housing Supplementary Planning Document.

The proposal seeks consent for 272 new dwellings and provides an affordable housing commuted sum of £2,074,213. This equates to approximately 5% affordable housing. This is well below the 35% required under Policy 19 of the Adopted Core Strategy. However a number of points/ factors must be taken into consideration including payment of CIL, provision of a zero carbon scheme and Government policy support to deliver market housing as well as affordable housing where possible.

The NPPF states that planning obligations should be set at a level which is flexible and which does not result in developments being stalled. It also makes it clear that it is a legitimate part of planning that developers and landowners should be able to achieve competitive returns in order to ensure viability, and ultimately deliverability. The councils Affordable Housing Supplementary Planning Document supports this stance and states that affordable housing must be provided 'unless it can be demonstrated that it is unviable to provide the specified level (35%) or there is no evidence of need in the area'. It goes on to state that 'in cases where the applicant considers that the site cannot viably support the Council's affordable housing policy requirements, the Council will require the applicant to submit a financial appraisal and supporting evidence at pre-application stage. This will enable the Council to assess at the earliest opportunity, the optimum affordable housing mix which is economically viable on the site'.

A viability assessment has been submitted in support of the current application. This information is confidential but sets out all the costs and considerations including Gross Development Value, construction costs, professional fees, profit, site purchase prices, alternative land values etc. This assessment has been tested by the Council's Strategic Housing team, who are satisfied that the financial contribution of £2,074,213 towards affordable housing set out in the appraisal combined with the CIL payment of £2,925,787 and the assumptions therein are sound.

The applicants were unable to secure the involvement of a Registered Social Landlord for the management and maintenance of affordable housing units on site following the outline planning application (ref 4/02320/14/MOA). This remains the case with the current proposal. Given the reluctance of RSL's to take on units within the scheme itself, a commuted payment is considered reasonable.

A commuted payment has already been assessed as part of an application to Vary the legal agreement pursuant to Outline consent. This has not yet been finalised but the principle of a commuted sum as opposed to units provided on site is aggregable. The value of this contribution based on the approved outline permission for 208 flats was £3.285 million. This equates to 35% and has been assessed on the basis of an independent viability assessment.

A revised viability assessment associated with the current application indicates that a contribution of £2,074, 213 million is available for affordable housing. This reflects the construction costs and the need to pay a fixed contribution of £2,925,787 under CIL towards infrastructure provision; the total community contribution secured via S106 for affordable housing and through CIL would be £5,000,000.

Based on the above, and from the information received in support of the application, including a detailed viability assessment, it is considered reasonable in this instance to allow a lower than required affordable housing contribution.

Impact on Highway Safety.

In accordance with Policy CS9 (Management of Roads) the traffic generated from new development must be compatible with the location, design, and capacity of the current and future operation of the road hierarchy, taking into account any planned improvements and cumulative effects of incremental developments.

It is clear that the development will create an increase in traffic on the local highway network. The site is situated at an already busy road junction (Two waters / London Road). Detailed Traffic Assessments have been submitted in support of the proposals.

The Highway Authority initially recommended refusal on the basis that insufficient evidence was provided to demonstrate that the development would not have an adverse impact on highway safety. There were two areas of concern. Firstly the operational impact the proposed development would create on the joint operation of the Whiteleaf Road / London Road priority road junction and the Two Waters Road / London Road signal controlled junction. Secondly the efficiency of the APS to process cars during peak period demand was questioned. An inability to process the cars would lead to the potential for vehicles queuing to access / exit the development, spilling out onto Whiteleaf Road and blocking the free-flow of the surrounding public highway.

Two Transport Assessment Addendum Reports (December 2015 and Jan 2016) were submitted providing more evidence in support of the Transport Assessment prepared by Nichols Consulting (dated Oct 2015). The purpose of the addenda was to accurately model the capacity of the junction and should detrimental impacts associated with the development be found, to propose mitigation measures; and to address the issues regarding the efficiency of the APS.

The Highway Authority, Herts County Council has been consulted and have assessed the proposal in detail. Having assessed the addendums, the Highway Authority finds the proposals acceptable, subject to the imposition of conditions, contributions towards the upgrade of the canal towpath and pedestrian links and the introduction of several highway improvements.

In summary, the addendums found that the net impact trip generation numbers are 7 less in the AM peak house and 11 less in the PM peak hour than those agreed in the outline consent. These figures have been agreed and are largely due to the omission of the office floor space in the current proposal. Junction modelling has been undertaken and HCC, in conjunction with Ringway, have reviewed the modelling data and are satisfied that the development will not result in severe cumulative impacts to the highway network. Furthermore the APS will only allow one or two vehicles to exit at any given time and would therefore result in a maximum of 2 vehicles existing the development site at approximately 60-90 second intervals.

The applicants have agreed to undertake highway improvements as part of the development and these will be secured by legal agreement. The improvements include; KEEP CLEAR road

markings on front of Whiteleaf Road, refresh GIVE WAY markings on Whiteleaf Road, to optimise the use of the existing SCOOT (Split Cycle Offset Optimisation Technique) traffic light computer controlled system and to introduce MOVA (Microprocessor Optimised Vehicle Actuation) software.

With regard to the APS, an approach was agreed with HCC to establish a suitable APS processing time (87 second cycle time). Average demand profiles and normal distribution profiles were used to calculate likely queues. The methodology used highlighted there would be queuing back onto Whiteleaf Road for a 10-15 minute period. The revised ground floor layout, that includes laybys and an extra queuing lane, would provide appropriate on-site storage to accommodate this queuing such that there would be no over spill onto the public highway.

The additional evidence and plans submitted have been assessed and Herts County Council Highways no longer object to the proposal. It is recommended that permission be granted subject to the imposition of several conditions and the completion of a legal agreement.

Parking

The proposal seeks consent for 318 car parking spaces, 313 in an automated system and 5 electric car stations on the ground level. This equates to a ratio of 1.2 car parking spaces per dwelling. This is proposed in lieu of the previously agreed underground parking scheme of 228 spaces to serve 208 flats and 830sqm of office (ratio of 1.1 space per dwelling).

The local parking standards are set out under saved Appendix 5 of the Local Plan. The maximum parking requirements for the various components of the proposed building are as follows:

- 1.25 spaces per one-bedroom dwelling;
- 1.5 spaces per two-bedroom dwelling;
- 2.25 spaces per three-bedroom dwelling;
- Retail (Class A2) - 1 space per 30m² gross floor area;
- Leisure (Class D2) - where individual land use components are not known, 1 space per 15m² gross floor area (shared parking).

The application site is located within Accessibility Zone 4 under the Accessibility Zones for the Application of Car Parking Standards Supplementary Planning Document, wherein 75% to 100% of the maximum parking standard would be expected for non-residential uses.

In accordance with Appendix 5 a maximum of 403 spaces would be expected. The proposed parking at 318 spaces is therefore in accordance with Appendix 5 as it does not exceed 403. Furthermore the ratio now proposed is preferable to that agreed at outline stage and a refusal based on car parking provision could not be sustained.

Parking has been raised as a concern by local residents. The Car Parking Standards Supplementary Planning Document states that new residential development will generally be expected to accommodate all parking demand on site. However, significantly lower levels of parking provision may be acceptable where demand is likely to be less and a tendency for over spill on-street is, or can be, controlled for example high density housing in town centres, near railway stations or housing over shops.

In addition, paragraph 39 of the NPPF is relevant and states that if setting local parking standards for residential and non-residential development, local planning authorities should take into account:

- the accessibility of the development;

- the type, mix and use of development;
- the availability of and opportunities for public transport;
- local car ownership levels; and
- an overall need to reduce the use of high-emission vehicles.

The Design and Access Statement notes that parking for the residential units has been provided on a ratio of 1:2 (one space per dwelling). It is noted above that the application site is within 950m of the town centre and 1000m to the station. It does however also benefit from a location within an employment area, including proximity to an existing supermarket, and other modes of public transport such as buses on London Road. The site is also in close proximity to the local centre on London Road to the east of the application site and Hemel Hempstead town centre. The development is therefore considered accessible.

With regard to car ownership levels and reducing the use of vehicles, the parking proposed equates to 1.2 spaces per dwelling. Whilst the applicant is keen to promote low car usage and it was their original intent to market the parking and residential units separately so residents have the choice to be 'car free', they have agreed to provide one space to be allocated to each unit. This would then comply with our parking policies and this would be secured by a Section 106 head of term. The surplus parking would be managed by the building management company who would rent/sell additional spaces to occupiers or make them available for visitor parking. Residents would also have the opportunity to access the electric car share scheme. The applicant has suggested that the parking management fees would be approximately £400 per year. The details of the parking would be secured by a management plan subject to a S106 legal agreement.

The APS consists of three components 1. Two Entry / Exit bays where cars are left and collected by drivers. 2. Parking places (313) where cars are stored. 3. Main transport Unit (MTU) which collects car from entry bay and places it in a parking space by a conveyor and robotic system. Entrance to the car park would be via an automatic licence recognition barrier system (visitors would have intercom via reception). The car is retrieved by use of a RFID key or a code (in the case of a visitor). There is also an on-site electric car share and electric bike share scheme.

The environmental benefits of the APS compared to the approved underground parking scheme are welcomed. The APS reduces CO2 emissions as they eliminate the need for cars to circle, idle and search for parking spaces, vehicles are parked via a conveyor and robotic system. The APS requires less building material, much less excavation, and shorter construction times than basement car parking systems. The APS provides for a far more sustainable, efficient use of the land.

The parking provision and arrangements proposed are considered acceptable and comply with Dacorum Borough Council's Parking Standards.

Access and Servicing Arrangements

The development is proposed to be accessed (pedestrian and vehicular) from Whiteleaf Road. This remains the same as approved under the Outline consent.

In the current proposal the vehicle access to the development also serves as the access to the Automated Parking System (APS). A vehicle crossover is provided for vehicles and a zebra crossing for pedestrians. Adequate visibility splays can be achieved in both directions and will be conditioned. HCC have confirmed, subject to conditions that the site can be safely accessed by all users.

Concern about the sites internal access / layout at ground floor level was initially expressed by HCC, (although this did not form the basis of their recommendation for refusal as it would not

impact the public highway). Swept path assessments for access to the Electric Car Parking Spaces and amendments to the ground floor layouts have subsequently been provided demonstrating that manoeuvring around the site is possible. HCC has reviewed these and are they are deemed suitable. All users can safely navigate around the development.

The footprint of the site is not sufficient to accommodate appropriate turning for servicing and delivery vehicles. The TA sets out that servicing vehicles would back into the site, as per the current situation. This manoeuvre would however be required far more frequently with the proposed residential development than the current office use on site. The outline scheme had a condition attached to secure details of refuse collection and facilities for servicing vehicles. The applicant has confirmed that the refuse will be collected by a private refuse company who will be able complete multiple pickups a week.

With regard specifically to refuse collection, the Councils Waste Services department have expressed significant concerns with the development. The developer has however confirmed that the development would use a private commercial waste company to collect the waste associated with the proposed development. The initial reason for this is that the building would be offering more than once weekly collections. There is on-site compaction and collections and this is better suited but not exclusive to private contractors. The details are yet to be finalised and the appointed management company would need to be actively involved in the formation of a waste management strategy. However, it is envisaged that residents would take their waste and recyclables to an allocated chute located towards the inner core. The chutes deliver the waste to a compactor before being deposited into a series of bins in an allocated Refuse Collection Area located at ground floor level. A waste collection vehicle would then collect the waste. Two communal chutes for waste will be provided per floor; 1 for recycled bagged waste and 1 for general bagged waste. To encourage recycling residents will be encouraged by being given discounts to the service charges in the amount by weight of recycling they do. To further reduce fees for waste collections and indeed space required for waste collections a general waste compactor will be installed at the base of the chute in the refuse collection area. This will reduce the number of bins required and the frequency of collection.

As it is proposed to utilise a private commercial waste company, this would fall outside the jurisdiction of the Local Authority. There are alternative solutions allowing Local Authority access to the site if they were required to pick from the site in the future. The applicants are exploring an alternative option which requires the acquisition of an existing lay-by between the development site and Arriva to the south. The lay by would be used by servicing and delivery vehicles. This land falls outside the current application site and as such does not form part of the current proposals.

Whilst this would fall outside the jurisdiction of DBC, and notwithstanding the details submitted, a waste management plan would need to be approved. If, in the future the commercial company cease to collect the waste, the Council may have a statutory duty to undertake collections. As such, it is considered important to secure a waste management plan by way of a section 106 legal agreement which ensures private waste collection in perpetuity unless agreed by DBC. This would allow appropriate access to be agreed in the future (perhaps the lay-by options subject to agreement with Highways) and a deed of variation completed.

Subject to the imposition of a condition / legal agreement there would be no sound planning reason to refuse the development based on access and servicing.

Accessibility and Public Transport

The proposed site is not considered to be particularly sustainable or accessible to alternative modes of transport. This is demonstrated by the fact that it lies outside accessibility zone 3 in

the DBC document Accessibility Zones for the Application of Car Parking Standards. The site does not benefit from a location close to the town centre, or the nearest railway station, located approximately 950m and 1000m away respectively. However, it does benefit from a location within an employment area, including proximity to an existing supermarket, and other modes of public transport such as buses on London Road. The site is also in close proximity to the local centre on London Road to the east of the application site and its various services and facilities. The development is therefore considered reasonably accessible.

The nearest bus stop to the development site is located on the A414, Two Waters Road and is approximately 250metres from the site. There are five routes serving this stop. However they only have limited frequency. The nearest railway station is Hemel Hempstead which is some 1000metres or 15 minute walking distance from the application site. The station is on the west coast main line between London Euston and Birmingham New Street. Both the A414 Two Waters Road and the A4251 London Road have continuous foot ways on both sides and the signalised junction of these two roads provides for all pedestrian movements. There are no specific provisions for cyclists in the form of cycle lanes or advanced cycle stop lines on either the A414 Two Waters Road or the A4251 London Road. There are no National Cycle Network routes or other off road routes in the vicinity of the application site.

A Framework Travel Plan is contained within the Transport Assessment. Notwithstanding this, a full Travel Plan would be required and would need to be secured via legal agreement. In addition the Highway Authority has recommended that developer contributions should be sought to provide upgrades to the canal towpath and pedestrian links in the vicinity of the site. The applicant has agreed to pay £75,000 towards these upgrades and provide a Full Travel Plan via Section 106 Legal Agreement.

It is considered that the upgrading of the towpath and pedestrian links will improve the development access to the local public transport network and local services in line with the NPPF, as well as Core Strategies NP1 and CS8.

Construction

The submitted Traffic Assessment (including the two addendum's) does not contain specific information regarding the potential impacts on the highway network during construction, it does however acknowledge the need for a Construction Logistics Plan. The development covers the entire site and incorporate underground car parking. As such issues such as parking for contractors, material storage and delivery, waste storage etc would all need to be addressed.

Given the size of the site, the scale of the development, and the need for substantial ground works (excavation for underground parking) the applicants have agreed to a Construction Logistic Plan which will be secured via Legal Agreement.

Government Policy seeks to ensure that all planning authorities take responsibility for waste management. Policies of the Herts County Council Waste Core Strategy and Development Management Policies Development Plan Document 2012 seek to promote the sustainable management of waste in the County and to have regard to the potential for minimising waste generated by development.

A detailed Site Waste Management Plan (SWMP) has been submitted to record the sustainable management of all waste associated with the proposed development. It demonstrates how the development aims to reduce the amount of waste produced on site, identifies the types of waste to be removed and where that waste will be taken.

The County Council has reviewed the Management Plan and is satisfied that subject to several amendments the document is acceptable. Amongst other things, it is noted that

predicted waste-arising have not yet been determined. Whilst the plan must be written at the construction design phase, it needs to be maintained during the whole project. A SWMP is a live document that evolves as the development progresses. Predicted waste-arising would need to be included in the SWMP prior to the commencement of development.

It is important that the plan is completed and implemented in full. The submission of a full, updated SWMP will be secured via legal agreement.

Flood Risk and Sustainable Drainage

Policy 31 of the Dacorum Core Strategy states that water will be retained in the natural environment as far as possible. Measure to restore natural flows in the river systems and the water environment will be supported. Development would, amongst other things, be required to minimise water run-off, secure opportunities to reduce the cause and impact of flooding, and avoid damage to Groundwater Source Protection Zones. IN addition Policy CS29 states that development must provide an adequate means of water supply. surface water and foul drainage.

Specialist advise has been sought from the County Council as the Lead Local Flood Authority.

The surface water drainage assessment carried out by EnviroCentre referenced 467264 dated October 2015 submitted with the application did not provide a suitable basis for assessment to be made of the flood risks arising from the proposed development. A revised Surface Water Drainage Strategy prepared by Thomasons (March 2016) has been submitted to support the original strategy. The County Council is now satisfied that the proposed development site can be adequately drained and any potential existing surface water flood risk can be mitigated in accordance with the submitted drainage strategy. Subject to the imposition of conditions the County Council has no objection.

The proposal complies with Policy CS31 of the Core Strategy.

Contaminated land

A Desk Study Assessment Report and Ground Investigation Report have been submitted in support of the proposal. The reports confirm that the risks posed to future occupants or construction workers as a result of the existing ground conditions are low and can be appropriately mitigated where necessary.

The Councils Environmental Health team have reviewed the information submitted. Subject to the imposition of the standard conditions they have no objection to the development.

Air Quality

Policy CS32 of the Core Strategy sets out that development will be required to help support improvements in identified Air Quality Management Areas and maintain air quality standards throughout the area. The application site lies within close proximity to two of the Council's Air Quality Management Areas (Lawn Lane and London Road).

An Air Quality Assessment has been submitted in support of the proposal. Environmental Health have confirmed that subject to the implementation of the mitigation measures set out in the report there would be no harm to air quality standards. The development is acceptable.

Ecology

An ecological Report has been submitted in support of the application. Hertfordshire Ecology

have been consulted on the proposals and confirm that the report identified little or no ecological interest other than the potential for nesting birds within the scrub. It is suggested that an informative be included.

Archaeology

The County Councils Historic Environment Advisor has reviewed the information submitted and assessed the proposals. The following comments have been received;

The current application site is located in Two Waters, Hemel Hempstead, adjacent to the River Bulbourne. Evidence from historic mapping (in particular the 1843 tithe map) shows a site of a Malt house within the site bounds (HER No. 7114). This forms part of a large industrial post-medieval landscape, with a malting located some 130m to the east of the current site (HER No. 7113) and Two Waters Paper Mill (HER No. 7112) 200m to the sites north east. The sites location along the valley edge of the River Bulbourne lends itself to prehistoric settlement activity and the potential for paleoenvironmental deposits associated with the river.

Given its favourable topographical position, the known heritage asset within the site bounds and its proximity to other heritage assets, the proposed development site possesses potential for the presence of heritage assets with archaeological interest.

Subject to two conditions being imposed the County Council are satisfied that the proposed development would not have any adverse archaeological implications.

Environmental Agency

The Environment Agency are satisfied that subject to the imposition of several conditions, the development does not pose a risk to the environment, in particular in relation to groundwater or contamination of the Mid-Chilterns Chalk, a drinking water protected area.

Other Material Planning Considerations

Crime Prevention and Security

The Herts Police Crime Prevention Designer has confirmed that he finds the scheme acceptable, subject to a number of conditions. These have been included in the recommendation. The suggested conditions will ensure these standards are achieved to the satisfaction of Herts Police and the LPA and will ensure that the proposed development provides a secure and safe working and living environment.

Section 106

The following Heads of Terms have been agreed.

Community Benefits;

- Full Green Travel Plan
- Travel Plan Annual Review
- Travel Plan Contribution - £6,000
- Construction Management Plan
- Fire Hydrants
- Sustainable Urban Drainage Management Plan
- Landscape /Sustainability Management Plan
- Waste / Servicing Management Plan
- Construction Logistics Plan

Properties marketed with minimum of one car parking space per unit
Cafe, gym, and function room retained in perpetuity for residents only

Financial Contributions;

Canal Towpath and Pedestrian Links Contribution - £75, 000
Affordable Housing £2,074,213

Highway Improvements;

Keep Clear Road Markings
MOVA (Microprocessor Optimised Vehicle Actuation)
SCOOT (Split Cycle Offset Optimisation Technique)

Community Infrastructure Levy (CIL)

The proposed development would be CIL liable. The site is located in Zone 3 wherein the liable area is charged at £100 per square metre. CIL is calculated on the basis of the net increase in internal floor area. Based on the submitted plans a CIL payment of £2,925,787 would be payable.

RECOMMENDATION - That determination of the application be **DELEGATED** to the Group Manager, Development Management and Planning with a view to approval, subject to the completion of a planning obligation under s.106 of the Town and Country Planning Act 1990- suggested conditions:-

- 1 **The development hereby permitted shall be begun 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 **No development shall commence on the building (above ground works) until full details and samples of the materials proposed to be used on the external walls/roofs of the development shall have been submitted to and approved in writing by the local planning authority. The schedule of materials shall be supported by a statement explaining what factors have been taken into account during the selection of materials, and how they would age and appear over time. A sample panel of all external materials for approval shall be set up on site (at a time agreed with the LPA). The approved materials shall be used in the implementation of the development.**

Reason: To ensure a satisfactory appearance to the development.

- 3 **No development shall commence on the building (above ground works) until full details of both hard and soft landscape works shall have been submitted to and approved in writing by the local planning authority. These details shall include:**

- hard surfacing materials;
- means of enclosure;
- soft landscape works which shall include planting plans; written specifications (including cultivation and other operations associated with

plant and grass establishment); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate;

The approved landscape works shall be carried out prior to the first occupation of the development hereby permitted and thereafter maintained as such.

Reason: To ensure a satisfactory appearance to the development and to safeguard the visual character of the immediate area.

- 4 Prior to the first occupation of the development hereby permitted the proposed access, on-site car and cycle parking, shall be demarcated, levelled, surfaced and drained in accordance with the approved plans and thereafter retained for that specific use.**

Reason: To ensure the permanent availability of the parking and manoeuvring area, in the interests of highway safety in accordance with Policies CS8 and CS12 of the Dacorum Core Strategy and saved Policies 51 and 58 of the Dacorum Borough Local Plan 1991-2011.

- 5 Notwithstanding any details submitted as part of the planning application, prior to the commencement of the development hereby permitted, plans and details showing how the development would best meet Code Level 4 (or equivalent) and meet the objectives of Policies CS28, CS29 and CS31 of the Dacorum Core Strategy (September 2013) shall be submitted to and approved in writing by the local planning authority.**

Within three (3) months of occupation of any of the residential units, evidence shall be submitted in the form of a Post Construction Certificate (prepared by a Code for Sustainable Homes qualified assessor) to demonstrate full compliance with the approved Energy Statement.

Reason: To ensure the sustainable development of the site in accordance with Policies CS28, CS29, and CS31 of the Dacorum Core Strategy.

- 6 Unless otherwise agreed in writing by the Local Planning Authority, development other than that required to be carried out as part of an approved scheme of remediation must not commence until Conditions (a) to (d) below have been complied with. If unexpected contamination is found after development has begun, development must be halted on that part of the site affected by the unexpected contamination to the extent specified by the Local Planning Authority in writing until Condition (d) has been complied with in relation to that contamination.**

(a) Site Characterisation

An investigation and risk assessment, in addition to any assessment provided with the planning application, must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme are subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority. The report of the findings must include:

- a survey of the extent, scale and nature of contamination;
- (ii) an assessment of the potential risks to:
 - (i) human health,
 - property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,
 - adjoining land,
 - groundwaters and surface waters,
 - ecological systems,
 - archeological sites and ancient monuments;
- an appraisal of remedial options, and proposal of the preferred option(s).

This must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy CS32 Dacorum Core Strategy.

7 Submission of Remediation Scheme

A detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy CS 32 of the Dacorum Core Strategy.

8 Implementation of Approved Remediation Scheme

The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.

Following completion of measures identified in the approved remediation scheme, a verification report (referred to in PPS23 as a validation report) that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval in writing of the Local Planning Authority.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy CS32 of the Dacorum Core Strategy.

9 Reporting of Unexpected Contamination

In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of Condition (a) above, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of Condition (b), which is subject to the approval in writing of the Local Planning Authority.

Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with Condition 8.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy CS 32 of the Dacorum Core Strategy.

- 10 The development shall be carried out fully in accordance with the submitted Air Quality Assessment: REport Ref: AQ0573;GEM Air Quality Ltd;February 2015. All mitigation measures relating to construction activities shall be implemented. The recommended measures within Table 21 and Table 22 must be adhered to in order to ensure the impact of construction activities is negligible and minimal complaints are received relating to dust.**

Reason: The site lies within close proximity of two Air Quality Management Areas (Lawn Lane and London Road). In order to ensure an acceptable level of air quality and to comply with Policy CS32 of the Core Strategy.

- 11 No development shall commence until a scheme that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:**

1) A preliminary risk assessment which has identified:

- all previous uses,
- potential contaminants associated with those uses,
- a conceptual model of the site indicating sources, pathways and receptors,

□ **potentially unacceptable risks arising from contamination at the site.**

2) A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site. 3) The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

Reason: The Thames River Basin Management Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery. Without this condition, the impact of contamination could prevent recovery of the Mid-Chilterns Chalk, a drinking water protected area.

Paragraph 109 of the National Planning Policy Framework, states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.

Paragraph 120 states that local policies and decisions should ensure that new development is appropriate for its location, having regard to the effects of pollution on health or the natural environment, taking account of the potential sensitivity of the area or proposed development to adverse effects from pollution. Paragraph 121 also states that planning policies and decisions should ensure that adequate site investigation information, prepared by a competent person, is presented.

- 12 **Prior to the occupation of any part of development hereby permitted a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.**

Reason: To protect groundwater in line with your policy CS32, The Thames River Basin Management Plan, Planning Practice Guidance and the National Planning Policy Framework (see reason 1).

- 13 **If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy**

shall be implemented as approved.

Reason

To protect groundwater in line with your policy CS32, The Thames River Basin Management Plan, Planning Practice Guidance and the National Planning Policy Framework (see reason 1).

- 14 **No impact piling or any other foundation designs using penetrative methods shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and a Piling Risk Assessment to demonstrate that the chosen piling method does not increase the risk of near surface pollutant migrating into deeper geological formations and aquifers has been submitted to and approved in writing by the Local Planning Authority. Any piling must be undertaken in accordance with the terms of the approved Piling Method Statement.**

Reason

To protect groundwater in line with your policy CS32, The Thames River Basin Management Plan, Planning Practice Guidance and the National Planning Policy Framework (see reason 1)

- 15 **Investigation boreholes and ground source heating and cooling using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.**

Reason

To protect groundwater in line with your policy CS32, The Thames River Basin Management Plan, Planning Practice Guidance and the National Planning Policy Framework (see reason 1).

- 16 **No infiltration of surface water drainage into the ground at this site is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.**

Reason

To protect groundwater in line with your policy CS32, The Thames River Basin Management Plan, Planning Practice Guidance and the National Planning Policy Framework (see reason 1).

- 17 **No development shall take place until a long-term monitoring and maintenance plan in respect of contamination including a timetable of monitoring and submission of reports to the Local Planning Authority shall be submitted to and approved in writing by the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action**

arising from the monitoring, shall be submitted to and approved in writing by the Local Planning Authority. Any necessary contingency measures shall be carried out in accordance with the details in the approved reports. On completion of the monitoring specified in the plan a final report demonstrating that all long-term remediation works have been carried out and confirming that remedial targets have been achieved shall be submitted to and approved in writing by the Local Planning Authority.

Reason

To protect groundwater in line with your policy CS32, The Thames River Basin Management Plan, Planning Practice Guidance and the National Planning Policy Framework (see reason 1).

- 18 **The development hereby approved shall be carried out fully in accordance with the submitted Crime Prevention Report.**

Reason: To prevent crime, achieve the Secured By Design objectives and to ensure a secure residential environment in accordance with Policy CS12 of the Dacorum Core Strategy..

- 19 **Visibility splays of not less than 2.4 m x 43 m shall be provided to each side of the access where it meets the highway before any part of the development hereby permitted is first brought into use, and they shall thereafter be maintained at all times free from obstruction between a height of 0.6 m and 2.0 m above the level of their adjacent highway carriageway.**

Reason: In the interests of highway safety in accordance with Policies CS8 and CS12 of the Dacorum Core Strategy and saved Policies 51 and 58 of the Dacorum Borough Local Plan 1991-2011.

- 20 **The proposed development will be carried out fully in accordance with the details set out within the approved surface water drainage assessment carried out by EnviroCentre referenced 467264 dated October 2015 and drainage design carried out by Thomasons reference G21001 dated March 2016. All measures outlined including the following must be implemented;**

(iii) Limiting the surface water run-off to 5l/s with discharge into the Thames Water Sewer.

- 1. Providing 105m³ attenuation volume 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.**
- 2. Undertake drainage strategy to include the use attenuation tanks, green roofs and rainwater harvesting.**

The above measures should be fully implemented prior to the first occupation of the approved dwellings.

Reason: To prevent flooding by ensuring the satisfactory storage of and disposal of

surface water from the site. To reduce the risk of flooding to the proposed development and future occupants. In accordance with Policy CS31 of the Dacorum Core Strategy.

:

- 21 **No development shall take place until a detailed surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro- geological context of the development has been submitted to and approved in writing by the local planning authority. The drainage strategy should demonstrate the surface water run-off generated up to and including the 1 in 100 year + 30% for climate change critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.**

The scheme shall also include:

- 3. Provision of a fully detailed drainage plan showing pipe diameters, pipe runs, outlet points and location of SuDS features and supporting calculations.**
- 1. Detailed engineered drawings of proposed SuDS features.**
- 2. Details of how the scheme shall be maintained and managed after completion**

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

- 22 **No development shall commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed.**

Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community.

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

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

Reason; in ensure no adverse archaeological implications in accordance with Policy CS27 of the Dacorum Core Strategy.

- 24 **All demolition/development shall take place in accordance with the Written Scheme of Investigation approved under condition 23. The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition (A) and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.**

Reason; in ensure no adverse archaeological implications in accordance with Policy CS27 of the Dacorum Core Strategy.

- 25 **No development shall commence until a Foul Water Drainage impact study has been submitted to and approved in writing by the Local Planning Authority. The impact study shall confirm the extent of the network and any reinforcements required. Any reinforcements required shall be carried out fully in accordance with the approved details.**

Reason: to ensure foul water can be adequately provided for in accordance with Policy CS29 of the Core Strategy.

- 26 **Prior to the first occupation of the building hereby permitted sufficient space shall be provided within the site to enable a standard size servicing and or delivery vehicle to park, turn and re-enter the highway in a forward gear. This area shall be levelled, surfaced and drained in accordance with a detailed scheme submitted to and approved in writing by the Local Planning Authority, in consultation with the Highway Authority, and retained thereafter available for that specific use.**

Reason: In the interests of satisfactory development and highway safety in accordance with Policies CS8 & CS12 of the Dacorum Core Strategy and saved

Policies 57 & 58 of the Dacorum Borough Local Plan 1991-2011.

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

BEA_DWG- 001_V3.5 Rev A - REV A - SITE LOCATION PLAN
BEA_DWG- 002_V3.5 Rev A - REV A - BLOCK PLAN
BEA_DWG- 003_V3.5 Rev A - REV A - SITE PLAN
BEA_DWG- 004_V3.5 Rev A - TYPICAL BASEMENT PLAN
BEA_DWG- 005_V3.5 Rev C - GROUND FLOOR (WITH LAY-BYS)
BEA_DWG- 006_V3.5 Rev A - FIRST FLOOR
BEA_DWG- 007_V3.5 Rev A - 2ND - 12TH FLOOR
BEA_DWG- 008_V3.5 Rev B - 13TH FLOOR
BEA_DWG- 009_V3.5 Rev A - 14/15TH FLOOR
BEA_DWG- 010_V3.5 Rev A - 16TH FLOOR
BEA_DWG- 011_V3.5 Rev A - ROOF PLAN
BEA_DWG- 012_V3.5 Rev B - WEST ELEVATION
BEA_DWG- 013_V3.5 Rev B - SOUTH ELEVATION
BEA_DWG- 014_V3.5 Rev B - EAST ELEVATION
BEA_DWG- 014_V3.5 Rev B - NORTH ELEVATION
BEA_DWG- 016_V3.5 Rev A - ROOF PLAN
BEA_DWG- 017_V3.5 Rev A016 - ROOF PLAN HIGH LEVEL
BEA_DWG- 018_V3.5 Rev A017 - SECTIONS
BEA_DWG- 019_V3.5 - SECTION (PLANTERS / PV PANELS)
BEA_DWG- 020_V3.5 - SITE ACCESS
BEA_DWG- 021_V3.5 Rev A - PROPOSED SITE ELEVATION / STREET SCENE

BEA_DWG- 023_V3.5 - EXISTING GROUND FLOOR PLAN ON SITE LAYOUT
BEA_DWG- 024_V3.5 - EXISTING GROUND FLOOR PLAN
BEA_DWG- 025_V3.5 - EXISTING FIRST FLOOR PLAN
BEA_DWG- 026_V3.5 - EXISTING SECOND FLOOR PLAN
BEA_DWG- 027_V3.5 - EXISTING THIRD FLOOR PLAN

DRAFT CONSTRUCTION METHOD STATEMENT
AFFORDABLE HOUSING COMMUTED SUM STATEMENT
REFUSE STATEMENT
SOCIAL HOUSING
SKYLINE BROCHURE AND TECHNICAL ASPECTS
DAYLIGHT , SUNLIGHT AND OVERSHADOWING (OCT 15)
RADAR ASSESSMENT (NOV 14)
WASTE MANAGEMENT PLAN (OCT 15)
AIR QUALITY ASSESSMENT (FEB 15)
ASBESTOS SURVEY (MAY 04)
DETAILS LAND AND ACCOMMODATION SURVEY
EXTERIOR PREVIEW 001 - 004
INTERIOR PREVIEW 001 - 006
CRIME PREVENTION REPORT (OCT 15)
LAND VISUAL IMPACT ASSESSMENT (SEPT 14 / OCT 15)
2ND LANDSCAPE VISUAL IMPACT ASSESSMENT (DEC 15)
LIGHTING IMPACT ASSESSMENT (OCT 15)
STATEMENT OF COMMUNITY INVOLVEMENT
DESK STUDY ASSESSMENT REPORT (BROWNFIELD SOLUTIONS NOV 14)
GROUND INVESTIGATIONS (LISTERS GEOTECHNICAL CONSULTING AUG 15)
GROUNDSURE DATA REPORT (NOV 11)
DESIGN AND ACCESS STATEMENT
DRAINAGE STRATEGY (ENVIRO CENTRE - OCT 15)

AMENDED DRAINAGE STRATEGY (ENVIRO CENTRE - MARCH 16)
SURFACE WATER DRAINAGE STRATEGY (THOMASONS - MARCH 16)
SUDS SUPPLEMENTARY (FEB 16)
ECOLOGY REPORT (ARBTECH)
ENERGY STATEMENT (C-PLAN)
FLOOD RISK ASSESSMENT
NOISE SURVEY (SEPT 15)
SUSTAINABILITY STATEMENT
TRANSPORT ASSESSMENT (NICHOLS CONSULTING - OCT 15)
TRANSPORT ASSESSMENT ADDENDUM (VECTIO CONSULTING DEC 15)
TRANSPORT ASSESSMENT TECHNICAL NOTE (VECTIO CONSULTING JAN 16)

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

Article 31 Statement

Planning permission/advertisement consent/listed building consent has been granted for this proposal. The Council acted pro-actively through positive engagement with the applicant during the determination process which led to improvements to the scheme. The Council has therefore acted pro-actively in line with the requirements of the Framework (paragraphs 186 and 187) and in accordance with the Town and Country Planning (Development Management Procedure) (England) (Amendment No. 2) Order 2012.

INFORMATIVES:

Hertfordshire Highways

The applicant is advised to prepare a scheme detailing provision for on-site parking for construction workers for the duration of the construction period to ensure adequate off-street parking during construction, in the interests of highway safety.

The applicant is also advised to prepare a Construction Management Plan detailing how safe pedestrian and vehicle access will be managed for the duration of the construction period in the interests of pedestrian and vehicle safety.

Protected Species

The removal of trees and shrubs should be avoided during the breeding season (March / Sept inclusive) If this is not possible then a search of the area should be made by a suitably experienced ecologist and if active nests are found, then clearance must be delayed until the nesting period has finished.

• For birds, the removal of trees & shrubs should be avoided during the breeding season (March to September inclusive). If this is not possible then a search of the area should be made by a suitably experienced Ecologist and if active nests are found, then clearance must be delayed until the last chick has fledged.

I do not consider that bats will be an issue given the negative survey results and nature of the existing buildings on site.

On the basis of the above, **I do not consider there to be any ecological constraints associated with the proposals.** The opportunities for ecological enhancements (other than those proposed directly associated with the buildings) are limited given the size of the site, but where new shrubs or grassland edges are proposed, consideration could be given to planting of locally native species

particularly those that bear blossom, fruit (berries) and nectar to support local wildlife. Where non-native species are used they should be beneficial to biodiversity, providing a food source or habitat for wildlife.

Surface Water Drainage Strategy

the proposed drainage scheme relies on the use of pumps. The use of pumps to drain the site will significantly increase the future maintenance burden and therefore increase the risk of failure due to poor maintenance. Details of the maintenance of the pump should be provided along with an emergency plan showing how the site would respond if the pump failed. The LPA will need to be satisfied that the proposed drainage strategy will be maintained and managed for the lifetime of the development.

Please note if the LPA decide to grant planning we wished to be notified for our records.

For further guidance on HCC's policies on SuDS, HCC Developers Guide and Checklist and links to national policy and industry best practice guidance please refer to our surface water drainage webpage.

<http://www.hertsdirect.org/services/envplan/water/floods/surfacewaterdrainage/>

Affinity Water

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

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

Environment Agency

Developers should ensure that any proposed piling methods do not pose a pollution risk to controlled waters. Piling to facilitate building foundations or the installation of ground source heat pumps has the potential to create a pathway between contaminated shallow soils and deeper geological formations and aquifers. Deep piling can also result in physical disturbance of aquifers.

A Hydrogeological Risk Assessment of physical disturbance to the aquifer should also be undertaken and if unacceptable risks are identified, appropriate mitigation measures must be provided.

It is recommended that developers follow the risk management framework provided in our guidance for 'Piling into Contaminated Sites' and also refer to the document 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention'.

The Conceptual Site Model (CSM) supplied (document reference 15.06.004) is insufficient and additional information is required to update the CSM and reduce the uncertainties prior to carrying out the risk assessment to controlled waters. In particular, no groundwater data has been supplied.

A minimum of 3 groundwater monitoring boreholes that intercept the seasonal minimum level groundwater table are required to establish the groundwater levels, flow patterns and groundwater quality. This information should then used to determine likely sources of offsite contamination.

Groundwater sampling should be undertaken, using a risk based approach to determine likely analytical suits. These should be based on previous land uses, both on the site and the surrounding area, taking into account likely contaminants associated with historic and current uses, as identified in the Site Investigation (for example chlorinated solvents, BTEX etc).

More information is required on the bus refuelling facilities located to the south of the site. This should include the depth of USTs where present.

When dealing with contamination on site we recommend that developers:

- Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination.
- Refer to our Guiding Principles for Land Contamination for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
- Refer to our website for more information and, in particular, the Planning and Land Contamination resource pages at <https://www.gov.uk/contaminated-land>
- Refer to Groundwater Protection Principles and Practice (GP3). This can be viewed via our webpage at <https://www.gov.uk/government/publications/groundwater-protection-principles-and-practice-gp3>

The verification report should be undertaken in accordance with in our guidance '*Verification of Remediation of Land Contamination*'. This can be found at <http://publications.environment-agency.gov.uk/pdf/SCHO0210BRXF-e-e.pdf>. Please contact me if you have any queries.

Contaminated Land

The applicant is advised that a guidance document relating to land contamination is available in the Council's website:

<http://www.dacorum.gov.uk/default.aspx?page=2247>

National Grid

National Grid has identified that it has apparatus within the vicinity of your enquiry which may be affected by the activities specified.

Due to the presence of National Grid apparatus in proximity to the specified area, the contractor should contact National Grid before any works are carried out to ensure our apparatus is not affected by any of the proposed works.

Affected Apparatus

The National Grid apparatus that has been identified as being in the vicinity of your proposed works is:

3. High or Intermediate pressure (above 2 bar) Gas Pipelines and associated equipment
 - Low or Medium pressure (below 2 bar) gas pipes and associated equipment. (As a result it is highly likely that there are gas services and associated apparatus within the vicinity)

As your proposal is in proximity to National Grid's apparatus, we have referred your enquiry / consultation to the following department(s) for further assessment:

- Gas Distribution Pipelines Team

Requirements

Before carrying out any work you must:

- Ensure that no works are undertaken in the vicinity of our gas pipelines and that no heavy plant, machinery or vehicles cross the route of the pipeline until detailed consideration has taken place.
- Carefully read these requirements including the attached guidance documents and maps showing the location of National Grid apparatus.
- Contact the landowner and ensure any proposed works in private land do not infringe National Grid's legal rights (i.e. easements or wayleaves). If the works are in the road or footpath the relevant local authority should be contacted.
- Ensure that all persons, including direct labour and contractors, working for you on or near National Grid's apparatus follow the requirements of the HSE Guidance Notes HSG47 - 'Avoiding Danger from Underground Services' and GS6 - 'Avoidance of danger from overhead power lines'.
- In line with the above guidance, verify and establish the actual position of mains, pipes, cables, services and other apparatus on site before any activities are undertaken.

Guidance

High Pressure Gas Pipelines Guidance

If working in the vicinity of a high pressure gas pipeline the following document must be followed: 'Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties' (SSW22).

Excavating Safely - Avoiding injury when working near gas pipes

Standard Guidance

Essential Guidance Document

General Guidance Document

Excavating Safely in the vicinity of gas pipes guidance

Excavating Safely in the vicinity of electricity cables guidance

Thames Water

Surface Water Drainage

It is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is

recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777. Reason: to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted in some cases for extensions to existing buildings. The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the options available at this site.

Thames Water requests that the applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.

Where a developer proposes to discharge groundwater into a public sewer, a groundwater discharge permit will be required. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Groundwater permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 8507 4890 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.

A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent. Applications should be made at <http://www.thameswater.co.uk/business/9993.htm> or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these

recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses.

Swimming Pools - Where the proposal includes a swimming pool Thames Water requests that the following conditions are adhered to with regard to the emptying of swimming pools into a public sewer to prevent the risk of flooding or surcharging: -
1.The pool to be emptied overnight and in dry periods. 2.The discharge rate is controlled such that it does not exceed a flow rate of 5 litres/ second into the public sewer network.

Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

Waste and Minerals

The Site Waste Management Plan must be available to any contractor carrying out work described in the plan and should be forwarded to the Waste Planning Authority when complete. There is no need to provide monthly progress; instead the final figures at the completion of the project would be sufficient. These should be sent to the Spatial Planning and Economy Unit, Minerals and Waste Team, Hertfordshire County Council, CHN216, County Hall, Hertford, Hertfordshire, SG13 8DN.

This application site abuts an Employment Land Area of Search for waste activities (B2 and B8 uses) and is adopted as part of the Waste Plan for Hertfordshire. ELAS175 Two Waters (west of a414) is indicated in Inset Map 006 of the Waste Site Allocations Development Plan Document (adopted July 2014). This site falls completely within Area of Search A of the Waste Core Strategy (adopted November 2012) for Local Authority Collected organic waste.

Both ELAS sites at Two Waters are located on groundwater source protection zones and are in close proximity to Flood Zones Two and Three but are completely located within Flood Zone One.