

APPENDIX 1 – 4/03441/15/MFA

CONSULTEE RESPONSES IN FULL

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1. Hertfordshire Waste and Minerals

Original Comments:

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

Government policy seeks to ensure that all planning authorities take responsibility for waste management. This is reflected in the County Council's adopted waste planning documents. In particular, the waste planning documents seek to promote the sustainable management of waste in the county and encourage Districts and Boroughs to have regard to the potential for minimising waste generated by development.

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

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

- the likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities;*
- new, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service;*
- the handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities, and minimises off-site disposal.'*

This includes encouraging re-use of unavoidable waste where possible and the use of recycled materials where appropriate to the construction. In particular, you are referred to the following policies of the adopted Hertfordshire County Council Waste Core Strategy and Development Management Policies Development Plan Document 2012 which forms part of the Development Plan. The policies that relate to this proposal are set out below:

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

Policy 2: Waste Prevention and Reduction: &

Policy 12: Sustainable Design, Construction and Demolition.

In determining the planning application the borough council is urged to pay due regard to these policies and ensure their objectives are met. Many of the policy requirements can be met through the imposition of planning conditions.

Waste Policy 12: Sustainable Design, Construction and Demolition requires all relevant construction projects to be supported by a Site Waste Management Plan (SWMP). This aims to reduce the amount of waste produced on site and should contain information including types of waste removed from the site and where that waste is being taken to. Good practice templates for producing SWMPs can be found at:

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

http://www.wrap.org.uk/construction/tools_and_guidance/site_waste_management_planning/index.html

It is encouraging to see that appropriate desk-studies and ground investigations have been submitted as part of the application, and that the Sustainability Statement states that the proposal minimises the need for aggregates, due to the scale of the proposed development.

However, the county council would like a detailed Site Waste Management Plan to be submitted prior to the commencement of the demolition phase to set out how waste will be managed and if possible, how it can be re-used in the construction.

Whilst the Draft Construction Method Statement states that 90% of the existing building will be recycled in accordance with the sustainable policy of the development, the county council would like to see that the possibility to re-use and recycle the demolition waste on site has been seriously taken into account. A Site Waste Management Plan should set out the projected waste management from the demolition and would show that thought has been applied to the possibility of using on-site material in the construction phase. This would help reduce the quantity of waste sent to landfill and subsequently reduce the demand for primary extracted aggregates.

It is noted that asbestos has been discovered on the site and it is important that specialist removal is sought to manage the hazardous waste material. Hazardous waste management should be included in the Site Waste Management Plan. It should be noted that there are no hazardous landfill facilities in Hertfordshire, meaning that such material would require transporting out of the county.

There will be large quantities of inert waste and made ground from the demolition and when extracting material for foundations and for the underground car parking facility. Waste carriers and end-destinations should be in place as early as possible for this large quantity and this should also be specified in the SWMP.

The county council as Waste Planning Authority would be happy to assess any SWMP that is submitted as part of this development either at this stage or as a requirement by condition, and provide comment to the borough council.

It also important to note that the site sits next to one of the county's Employment Area of Search, ELAS 175 – Two Waters (West of A414), as designated in the Waste Site Allocations DPD Document (adopted July 2014). The county council considers that the 60 ELAS in Hertfordshire may be compatible with waste management uses and as such, waste management uses may come forward within the ELAS during the plan period. There would potentially be an issue of compatibility between waste management promoted at the ELAS and this residential proposal immediately adjacent.

SWMP received 10/12/15

Additional Comments

I write with regard to the Site Waste Management Plan submitted as part of application 4/03441/15/MFA and provide comments on behalf of the Waste Planning Authority. Whilst the provision for Site Waste Management Plan (SWMP) Regulations was repealed on 1 December 2013, the adopted Hertfordshire Waste Core Strategy and Development Management Policies document includes the requirement for a SWMP with planning applications under Waste Policy 12: Sustainable Design, Construction and Demolition.

The SWMP aims to reduce the amount of waste produced on site and should contain information including types of waste removed from the site and where that waste is being taken, to provide a means of recording the sustainable management of waste. The policy requests that completed SWMPs are submitted to the Waste Planning Authority to collate the waste data to assist with waste planning and monitoring by understanding the quantities of construction and demolition waste that is being produced which requires managing.

The SWMP is a live document that evolves with the development as it progresses on site. Whilst the plan must be written at the construction design stage, it should be maintained during the whole project. Where possible the county council would encourage the use of recycled materials in construction projects and seeks to ensure that waste materials are managed efficiently, waste is disposed of legally and material recycling, reuse and recovery is maximised through the most appropriate means. I have assessed the Site Waste Management Plan against the BRE SMARTWaste Plan: SWMP template which is considered to be best practice and I have provided my comments below.

Overall, the document is specific to the requirements of a Site Waste Management Plan though it is advised that certain important elements of the document are updated prior to operations commencing to increase the detail and usefulness of the SWMP as a tool to improve waste management in this and future projects.

The SWMP sets out the roles and responsibilities of members involved in the project though it does not clearly state the role of Retroflo in the project even though the document was written by a Retroflo employee. If Retroflo is the principle contractor, this should be stated in the table on page 2.

The first paragraph of the "Monitoring, Measurement and Completion" chapter should be amended to state that the client and contractor will comply with the requirements of Duty of Care that minerals will be handled efficiently and waste managed appropriately in line with Section 34 of the Environmental Protection Act (1990) and the Environmental Protection (Duty of Care) Regulations (1991). The rest of this section contains good detail.

The table on pages 5 and 6 has been well set out and categorises the waste materials using European Waste Codes. It is noted that at this time, predicted waste-arising have not been determined. These must be included in the SWMP before the development commences, otherwise the ability to review performance against predictions and targets to identify future waste management improvements, one of the main objectives of the SWMP, will not be possible. The county council would also advise that the sources of information used to determine the waste arising targets and predictions should be included. It is hoped that waste recordings from this project and others by the developer will be used to determine predictions for future SWMPs.

More detailed descriptions of the waste arising should be included along with the origin of each waste-type and detail should be included to state how waste materials will be re-used on site.

The sub-contractors are yet to be identified and therefore none of the waste carriers and end-destinations of material have been confirmed. Whilst the appointment of contractors does not necessarily alter the layout of the SWMP, it would be beneficial to update the SWMP with confirmed details of contractors, waste destinations and updated waste management predictions, when confirmed, prior to the commencement of work on site. It is appreciated that sub-contractors aren't always identified early but it is encouraging that the document includes space for important information to be included in the Site Waste Matrix.

It is encouraging to read the intention to review the waste management performance and to identify potential improvements. It is advised that reviews are included within the SWMP upon completion.

As a reminder, the principal contractor must ensure that the plan is kept on site, and every contractor knows where it is kept. It must be available to any contractor carrying out work described in the plan and a SWMP induction must be offered for all workers on site. The SWMP must be retained for two years following project completion.

To ensure the SWMP is effective and waste is being minimised and dealt with in the most efficient and responsible manner, the document would need to be completed and implemented in full. In addition the data 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 at the above address.

2. Env Health – Noise

Notice is hereby given that the Environmental Health Department:

- a) does not wish to restrict the grant of permission
- b) recommends that permission be refused for reasons set out below. However in the event that the application is given approval, the conditions overleaf should be applied.
- c) advises that any permission which the Planning Authority may give shall include the conditions overleaf.

3. Archaeology Comments

Please note that the following advice is based on the policies contained in National Planning Policy Framework (NPPF).

The current application sites 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 Malthouse 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. I therefore recommend that the impact of the proposed development on the historic historic environment should be mitigated in line with P141 of the National Planning Policy Framework (NPPF), and that the following provisions be made for a programme of archaeological works secured by a negative condition, should you be minded to grant consent:

1. A programme of archaeological evaluation (in the form of trial trenches) of the proposed development site (including access and parking areas, etc.) before any development commences, but after demolition of above ground extant buildings (should consent be granted),
2. And such appropriate mitigation measures indicated as necessary by the evaluation. These may include:
 - a) the preservation of any archaeological remains *in situ*, if warranted;
 - b) the appropriate archaeological excavation of any remains before any development commences on the site;
 - c) the archaeological monitoring and recording of the ground works of the development, including removal of the existing hard surfacing, ground reduction, foundations, services, landscaping, access, etc. (and also including a contingency for the preservation or further investigation of any remains then encountered);
 - d) the analysis of the results of the archaeological work, with provisions for the subsequent production of report and an archive,
and the publication of the results, as appropriate;
 - e) such other provisions as may be necessary to protect the archaeological interests of the site.

I believe that these recommendations are both reasonable and necessary to provide properly for the likely archaeological implications of this development proposal. I further believe that these recommendations closely follow para. 141, etc. of the National Planning

Policy Framework, relevant guidance contained in the National Planning Practice Guidance, and the recently issued Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015).

In this case two appropriately worded conditions on any planning consent would be sufficient to provide for the level of investigation that this proposal warrants. I suggest the following wording:

Condition A

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

1. The programme and methodology of site investigation and recording
2. The programme 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.

Condition B

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

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

If planning consent is granted, I will be able to provide information on professionally accredited archaeological contractors who may be able to carry out the necessary work.

I hope that you will be able to accommodate the above recommendations. Please do not hesitate to contact me should you require any further information or clarification.

4. Contaminated Land Officer

The Environmental Health Division is in receipt of the following reports submitted in respect of this application:

- Desk Study Assessment Report; Reference: JMC/C2454/4881 Rev A; 26 August 2015
- Ground Investigation; Report No: 15.06.004; Listers Geotechnical Consultants; August 2015

Desk Study Assessment Report:

The first issue of the above-mentioned Desk Study Assessment Report was submitted with planning application 4/02320/14/MOA and referred to the conversion of the current office building to residential, not demolition and re-build as proposed. Following comments from this department, the report was updated to reflect the demolition and re-build proposals and also included the Council's response to the recent request for environmental information. The revised report was dated 5 November 2015 and the following comments provided in memo dated 25 November 2014:

'The report has been amended to reflect the current application. The preliminary conceptual site model has identified potential significant contaminant linkages in relation to the site; however, these have all been assessed as low risk, with the exception of the potential for inhalation of ground gas from on-site Made Ground.'

The report discusses the potential incorporation of a cover system and the necessary tanking of the basement as mitigation measures should contamination and/or ground gas be present on-site. In terms of further works a 'preliminary contamination assessment' has been recommended. I am in agreement that further investigation should be undertaken. A Phase II intrusive investigation is required in order to establish actual contaminant concentrations in the soil and groundwater (if relevant) as well as the on-site gassing regime. The resulting information can then be used to ascertain whether remedial works are required and the exact nature of these works (e.g. depth of the cover system etc.) The Phase II intrusive investigation and associated sampling strategy must be designed to fully test all potential contaminant linkages identified within the preliminary conceptual site model. As further investigative works are required to characterise the site, I recommend that the standard contamination condition be applied, should planning permission be granted.'

In respect of 4/01781/15/DRC the first issue of the Desk Study Assessment Report, dated August 2014 was re-submitted and the following comments provided by Claire Jaggard:

'The report suggests that there will be low risks from contamination due to the historic use of the site. Whilst this may be the case, the report highlights the need for an Asbestos survey – has this been undertaken?

In addition I note that a number of industries have been operating in the vicinity in the past. Some of these land uses have the potential to affect the contamination status of this site as contaminants may migrate through the ground. This project will require deep excavations to construct the basement and I am concerned that as the status of the ground has not been fully assessed, this has the potential to expose site workers to contamination. I would therefore request that an intrusive assessment is carried out that considers soils up to the depths that workers will be exposed. Ground gas should also be considered as part of this assessment to ensure that the building design is appropriate to the site situation.'

In respect of the current application a revised version of the November 2014 Desk Study Assessment Report has been submitted (Revision A, dated 26 August 2015).

The preliminary risk assessment has identified the following:

- A low risk to end users associated with on-site Made Ground via ingestion, direct contact and inhalation of dusts.
- A moderate/low risk to end users associated with ground gas from on-site Made Ground via inhalation.
- A low risk to end users associated with off-site gas works, depots and builders yard via ingestion, direct contact and inhalation of vapours.
- A low risk to end users associated with the off-site former chalk pit and watercress beds via inhalation of ground gases.
- A low risk to controlled waters associated Made Ground via leaching, migration through groundwater or granular soils.

The report states that Made ground is likely to exist on-site however as the site has only been developed into the existing structure it is deemed unlikely that any gross contamination will be present. The proposed development includes a basement car park, if deep Made Ground or other ground gas sources exists, the basement is a potential receptor. However it is highly likely the basement car park will be tanked to prevent the ingress of groundwater and the tanking will also break the pathway of the ground gas. Therefore the risk is considered to be moderate/low. The various industries around the site are unlikely to have any contaminants migrating onto the site given their distance and potential for attenuation. The risk is considered to be low. Gross contamination is not anticipated on site and the development will predominantly be covered with hardstanding with a new drainage system installed, this will prevent infiltration and therefore any potential leaching of contamination. Therefore the risk to controlled waters is considered to be low.

Revision A takes into account the comments made by Claire Jaggard. The report states that an asbestos survey was beyond the scope of this report but a full asbestos survey has been recommended prior to demolition (I note that an asbestos survey by RS Specialist Services Ltd dated 14 May 2004 has been submitted within the application documentation). It is considered that the surrounding off-site sources are not likely to affect the site given their distance and potential for attenuation, as such the risk is considered to be low; despite this the potential contaminant linkage(s) associated with off-site sources are to be assessed via intrusive investigation due to the concerns raised. In terms of protection of construction workers, I am of the opinion that the following of Health and Safety procedures, appropriate use of PPE and good hygiene practices will protect site workers from the short-term exposure to contamination. Regards ground gas; it was previously requested that the gassing regime be established through intrusive investigation.

Ground Investigation:

The report describes the desk study and intrusive site investigation carried out by Listers Geotechnical Consultants Ltd in order to provide an evaluation of the ground conditions and the extent of any soil contamination present on the site.

The results of the desk study and walkover undertaken by Listers Geotechnical Consultants Ltd indicate that the following potential sources of ground contamination are present at or in close proximity to the site:

- Made Ground is possibly present on-site behind the sheet piled wall, dependent on its origin; this may have introduced soil contaminants onto site.
- Very slight possibility of on-site migration of diesel from bus depot next door via the groundwater.
- Migrating soil gases from the nearby gas works are a possibility.

The following most sensitive receptors have been identified at the site:

Human Health

- End users of the site (residents)
- Surrounding residents
- Construction workers

Environmental

- Controlled Waters – Holywell Chalk Formation (Principal Aquifer)

Potential pathways (linking source to receptor)

Human Health

- Inhalation of indoor and outdoor vapours and dust

- Inhalation of soil gases or vapours migrating through permeable strata into the buildings

Environmental

- Migration of contaminants through the unsaturated zone
- Migration of contaminants through the groundwater

In terms of the intrusive investigation; a total of nine exploratory holes were formed at the site, inclusive of 4no. deep cable percussive boreholes (to a maximum depth of 35mbgl) and 5no. continuous tube sample boreholes and dynamic probe holes. Groundworks were undertaken between 23 and 28 June 2015. Exploratory holes were essentially non-targeted and positioned approximately around the periphery of the site. BH1 and 2 were positioned along the northern boundary where the potential for Made Ground behind the retaining wall could be monitored and BH3 and 4 were positioned along the southern boundary, to assess the potential for hydrocarbon fuel from the bus station to the south of the site. Combined ground water and ground gas monitoring wells were installed within BH1 and BH4.

The ground investigation identified the following ground conditions:

- Made Ground – at each location from ground level to between 0.30 and 0.80mbgl
- Clay-with-Flints - at six of the nine locations beneath the Made Ground to depths of between 0.50mbgl to the rear (south) of the site and 5.50mbgl at the front (north) of the site
- Holywell Nodular Chalk - at each location from depths ranging from 0.30mbgl in the rear (south) of the site to 5.50mbgl in the front (north) of the site and down to the full depth of the investigation (35mbgl).

There was no visual or olfactory evidence of contamination encountered in any of the boreholes undertaken on the site. The boreholes at the northern (front) of the site indicate that there was not a substantial amount of Made Ground behind the retaining wall. The borehole along the southern boundary of the site indicated that there was no seepage of diesel from the coach station uphill to the south of the site.

Three rounds of ground gas monitoring were undertaken at the site on 9 July 30 July and 17 August 2015 from the monitoring wells within BHs 1 and 4. Monitoring has revealed oxygen levels of between 19.7% and 20.5% by volume, carbon dioxide levels of between 0.2% and 0.5% by volume, and methane levels of between 0% and 0.5% by volume. Flow rates ranged between 0 l/hr and 0.3 l/hr.

Five soil samples (A – E) were analysed for the following contaminants:

- Metals and inorganic substances
- Speciated PAHs

➤ TPH (eight band split)

It was not specifically stated where these five soil samples (A – E) were taken from on-site, it is assumed this relates to the continuous tube sample boreholes references (CTA – E). In terms of depths, sample A was taken from 1.00mbgl, sample B was taken from between 0.10 and 0.50mbgl, sample C was taken from 3.00mbgl, sample D was taken from 0.10mbgl and sample E was taken from 3.5mbgl.

Contaminant concentrations have been compared against generic assessment criteria (C4SLs and S4ULs) for a commercial/industrial end use. I note the proposed end use is primarily residential. The concentration of Dibenz(a,h)anthracene exceeded the S4UL of 3.5mg/kg for a commercial/industrial end use at CTB at 0.10mbgl (6.7mg/kg). This sampling location was situated within the Made Ground. All other contaminants exhibited concentrations below their generic assessment criteria. It is proposed to remove the majority of the Made Ground as part of the redevelopment and the remainder will be covered with hardstanding, as such no pathway will exist between the elevated concentration of Dibenz(a,h)anthracene and the end users. The only human health receptor that will be at a possible risk will be construction workers involved in its removal. To reduce the risk as low as reasonably practicable it is recommended that appropriate health and safety measures be implemented along with the use of PPE and good hygiene practices.

The risk to the underlying Principal Aquifer is considered to be very low and no further works or remedial measures are considered necessary.

The risk of ground gases impacting the site was assessed by reference to the paper 'A pragmatic approach to ground gas risk assessment for the 21st century' Card and Wilson, 2011. This indicated that no gas protection is necessary with regard to methane or carbon dioxide gas. Furthermore, no Radon gas protection measures are necessary.

CLO Comments:

The intrusive investigation is reasonably limited, however due to the nature of the development the majority of the site will be encapsulated beneath hardstanding thus severing direct contact pathways to the end users. Furthermore, a considerable quantity of soil will need to be removed off-site during the basement construction. The generic quantitative risk assessment has utilised generic assessment criteria for a commercial/industrial end use. The proposed end use comprises a high proportion of residential units as such I would request that the laboratory analytical results be re-assessed against the GACs for a residential end use. Any exceedances of the residential GACs within proposed soft landscaped areas will require remediation. Should any contaminants of a volatile nature be reported in excess of the residential GACs then remediation will again be required. Should any material be imported to site whether as part of a cover system or as clean cover for planting areas, this must be validated as chemically suitable for the proposed use. The Council has produced guidance (attached), which should be adhered to.

As further assessment is required, I recommend that the contamination condition(s) be applied should planning permission be granted.

Air Quality

The Environmental Health Division is in receipt of the following report submitted in respect of this application:

- The Beacon, Hemel Hempstead: Air Quality Assessment; Report Ref: AQ0573; GEM Air Quality Ltd; February 2015

The report provides an assessment based on the potential impacts of the proposed mixed-use development on local air quality. The assessment has also considered the impact of road traffic emissions on the proposed development. Nitrogen oxides (NO_x) and particulate matter (PM₁₀) have been modelled for the assessment using ADMS-Roads, including meteorological data. The most up to date understanding of NO_x/NO₂ relationships have been applied to the modelled NO_x concentrations in order to derive NO₂ concentrations. Predicted annual mean concentrations of NO₂ and PM₁₀ have been compared to the relevant air quality objectives. Short term concentrations have not been modelled. However, assumptions have been made regarding the short term concentrations based on the modelled annual mean concentrations. A qualitative assessment of the potential impacts from construction activities has been undertaken. Without proper mitigation, some degree of dust impact may occur at neighbouring receptors. The significance of these impacts is considered moderate adverse, at worst. However, any potential disturbances during the construction phase will be mitigated through appropriate considerate construction management which itself can be ensured via condition. On this basis construction dust can be minimised and the significance of effects from earthworks, construction and track out activities will be negligible. The change in predicted PM₁₀ concentrations at existing receptors in 2017 following completion of the proposed and committed developments is considered imperceptible. The significance of this change is considered to be negligible. Overall, PM₁₀ is a low priority consideration with regards to the impact of the proposed and committed developments.

At worst, the change in predicted NO₂ concentrations at existing receptors in 2017 following completion of the proposed and committed developments is considered imperceptible or small, depending on the location of the modelled receptor. The significance of this change is considered negligible or slight adverse. When considering the impact of the proposed development alone, the change in predicted NO₂ concentrations at existing receptors in 2017 is considered imperceptible or small. The significance of this change is considered negligible. Overall, NO₂ in 2017 is a medium to high priority consideration. In terms of the introduction of new exposure, predicted NO₂ and PM₁₀ concentrations at the proposed development are below the relevant air quality objectives.

In terms of mitigation of construction activities a number of measures have been proposed associated with site management, preparing and maintaining the site, operating

vehicles/machinery, operations and waste management, these are detailed within Table 21 on page 35 of the report.

In terms of mitigation of vehicle impacts, a number of mitigation measures have been suggested to help mitigate the potential air quality impacts in Hemel Hempstead. They will also show that the developer is actively promoting and working towards sustainable development. The suggested mitigation measures are detailed within Table 22 on page 37 of the report and include tree planting, electric car charging points, incentives for increased public transport use, car sharing and financial support. I note that on-site electric car and bike share schemes are proposed as part of the application, the implementation of which is strongly supported and encouraged, especially owing to the site's position within close proximity to two of the Council's Air Quality Management Areas (Lawn Lane, Hemel Hempstead and London Road, Apsley).

A condition should be attached should planning permission be granted relating to the requirement for the implementation of mitigation measures relating to construction activities. The recommended measures within Table 21 must be adhered to in order to ensure the impact of construction activities is negligible and minimal complaints are received relating to dust.

5. Crime Prevention Officer

Original Comments

- **Security** :
As of 1st October 20115, Approved Document Q (ADQ) has come in that requires under Building Regulations dwellings are built to "Prevent Unauthorised Access". This applies to any "dwelling and any part of a building from which access can be gained to a flat within the building". Performance requirements apply to easily accessible doors and windows that provide access in any of the following circumstances:
 1. Into a dwelling from outside
 2. Into parts of a building containing flats from outside
 3. Into a flat from the common parts of the building

Achieving the Secured by Design award meets the requirements of Approved Document Q (ADQ), and there is no charge for applying for the Secured by Design award. I would ask that this information is passed by way of informative to the applicant.
- **Postal delivery:** I note a partial explanation regarding this on page 8 of the Crime Prevention report, and page 40 of the DAS. However it does not say if post will then be posted through each individual flat door via a letter plate fitted to the flat door, or that there will be a communal post box area at ground floor level. If communal post boxes are used these must be covered by CCTV so as to prevent theft from the letter boxes.
- **Access Control:**
 - a. I am pleased regarding the access control to external communal doors only into a reception area where residents can then come and pick up their guest.

(Page 37 of DAS). This means that the internal access control doors from the reception must be to a security standard, with security standard locks. Maglocks are mentioned but no standard. I would look to Maglocks to a standard as defined for security in the BSIA document "132 Access Control A Specifiers Guide" of 10KN as a minimum.

Whilst video entry phones are mentioned at part a) on page 37 of the DAS, the photograph on the same page does not show video access. Each flat must have a video entry phone to the external communal entrance.

- a. Access control is mentioned re access via lift to a specific floor part d) on page 38 of the DAS, but should also apply to the stair cores.

- a. CCTV is mentioned on page 38 of the DAS internally for reception entry level, business corridors and pool leisure areas and externally to areas still to be assessed.
CCTV should also be deployed to cover ground floor communal corridors and stair core entrances at ground level; any communal postal boxes to deter theft; and the area where vehicles are dropped off and picked up,
- **Car Parking:** Whilst wishing to embrace the new parking technology for this proposed site, I am a little confused as to exactly how it will function successfully.
 - a. Page 7 of the Crime Prevention Report says about a barrier arm and roller shutter giving access to the underground parking, so that users can drive into the basement entrance. Page 61 of the DAS says about a ANPR activated barrier arm. However looking at the ground floor plan, the access appears open into an automated vehicle lift, so I cannot see where the barrier and roller shutter would be fitted?
If the basement / underground parking area were not secure (a barrier arm would not suffice), then I would **wish to formerly object**.

 - a. When reading how the automated car parking system is explained on pages 60 & 61 of the DAS, I wonder if there is the potential for residents getting anxious to retrieve their cars in the morning?
It is proposed to have parking for 313 car and it is explained in the text that the system can retrieve 50 cars per hour. This means it would take 6hrs for all 313 vehicles to leave the car park, (I presume via one exit system, although this is not said?). I presume from the plans though that 2 x entrance and exit systems would operate and could cover for both entrance and exit functions? If so then presumably in the morning residents leaving for work in the rush hour would be making use of both entrance / exit garage units (hopefully no nearby office staff arriving to park their vehicles?) which means that if all 313 vehicles were required to leave the site to take people to work it would still take 3 hours for all the vehicles to exit.
On page 63 of the DAS it states that "It is estimated that 50% of the flats will be occupied by commuters who use their cars to travel to their place of work." On page 64 of the DAS it says "on average 67% of people commute by car". I am not trained in such matters but are these figures realistic?
- **Cycle Storage:** I could not see cycle storage provided?
- **Studio Flats:** Flat 33 on 2nd to 12th floors and flat 14 on 1st floor is a studio flat. As no bed is shown on the plan and the flat is small, I presume a fold down bed will be fitted, otherwise there is no bed for the occupant?

Additional Comments

Following the receipt of additional information and a meeting, updated comments as follows;

- **Security – ADQ and Secured by Design part 2 physical security:**
We discussed document ADQ of Building Regulations and the physical security standards of Secured by Design and how achieving Secured by Design meets the requirements of document ADQ. If planning permission is granted the applicants will consider applying for the Secured by Design award, but in any case the development will still achieve ADQ standards. This answered my point of 4th November 2015 to my satisfaction.
 - **Postal delivery:** I was informed that postal delivery would be to the reception area when there was reception staff on duty (Mon to Sat) and that there would be communal post boxes for the residents post in the reception area, which would be covered by CCTV, to deter theft from the post boxes. This answered my point of 4th November 2015 to my satisfaction.
 - **Access Control:** We discussed access control for the building as a whole, security standards for communal doors, video entry phone systems and the provision of CCTV. This answered my point of 4th November 2015 to my satisfaction.
 - **Car Parking:** As regards the new technology for the car park, we discussed peak times in the morning rush hour and time for people to get in their vehicle put on their seat belt, especially if children present, before leaving the garage entrance / exit area. It was discussed that this could be managed by staff being present to help if needed. We also discussed about the barrier arm and ANPR as mentioned on page 61 of the DAS and it was explained this would be at the entrance to the garage vehicle lift entrance and that with ANPR this would residents park their vehicle quicker.
I note the applicants comments and leave with the planning system to resolve any issues.
 - **Cycle Storage:**
We discussed the type of cycle storage and its location, and I was assured that this would be suitable for all sizes of cycles (child's and adult) and easy for all groups to use including children and the elderly, which answered my comments of 4th November 2015.
- Studio flats:** We discussed regarding the studio flats and I leave any decision re these for planning to resolve any issues.

6. Lead Local Flood Authority

Amended surface water drainage strategy – March 2016

Thank you for re-consulting us on the above application for Symbio Place. In response to additional information provided by Thomasons reference G21001 dated March 2016 in relation to the above application, we can confirm that we are now in a position to remove our objection on flood risk grounds and advise the LPA that the proposed development site can be adequately drained and mitigate any potential existing surface water flood risk if carried out in accordance with the overall drainage strategy.

The drainage strategy is based upon attenuation and discharge into Thames surface water sewer at 5l/s. We acknowledge that rainwater harvesting will be provided within the drainage system to assist in reducing surface water run-off. We note that 105m³ attenuation volume needs to be provided for

the 1:100 plus climate change event. The 105m³ includes the total attenuation require plus extra for the rainwater harvesting which will be provided with four tanks, one to be located on the roof and the other three on cvels -1, -2 and -3 of the basement car park. Surface water would discharge to the Thames Water from the lowest basement tank only when the rainwater harvesting volume is exceeded. Thames water have been contacted and confirmation has been provided that they are satisfied in principle to the proposed connection.

We understand that it is intended to continue to investigate and quantify further initiatives to reduce surface water run-off. Where the operation of these tanks would aim to maximise the use of this water providing not only water to flush toilets but use water to create hydro-electric power using the 16 storey drop to operate turbines.

We therefore recommend the following conditions to the LPA should planning permission be granted.

LLFA position

The proposed development will only meet the requirements of the National Planning Policy Framework if the measures detailed in the 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 submitted with this application are implemented and secured by way of a planning condition on any planning permission.

Condition 1

1. Limiting the surface water run-off to 5l/s with discharge into the Thames Water Sewer.
2. 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.
3. Undertake drainage strategy to include to the use attenuation tanks, green roofs and rainwater harvesting.

Reason

1. To prevent flooding by ensuring the satisfactory storage of and disposal of surface water from the site.
2. To reduce the risk of flooding to the proposed development and future occupants.

Condition 2

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:

1. Provision of a fully detailed drainage plan showing pipe diameters, pipe runs, outlet points and location of SuDS features and supporting calculations.
2. Detailed engineered drawings of proposed SuDS features.
3. 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.

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

Informative to the LPA

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.

Original drainage strategy – Oct 2016

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.

The surface water drainage assessment carried out by EnviroCentre referenced 467264 dated October 2015 submitted with this application does not comply with the requirements set out in the Planning Practice Guide (as revised 6 April 2015) to the National Planning Policy Framework. The submitted surface water drainage assessment does not therefore; provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

In order for the Lead Local Flood Authority to advise the relevant local planning authority that the site will not increase flood risk to the site and elsewhere and can provide appropriate sustainable drainage techniques, the following information is required as part of the surface water drainage assessment;

1. Detailed SuDS Strategy
2. Provide a sustainable drainage system prioritising above ground methods.
3. Detailed surface water calculations for all rainfall events up to and including the 1 in 100 year + climate change event.
4. Confirmation from Thames Water that they are satisfied with proposed rates.

Overcoming our objection

To address the above points, please see the below comments;

1. The FRA has mentioned the use of green roofs and permeable paving however there are no further details of the proposed drainage scheme. This should be shown on a development layout plan. As this is a full planning application a detailed surface water drainage layout is required including the location of all SuDS features, pipe runs and existing surface water features overlain on the development layout along with all the corresponding detailed calculations.
2. We acknowledge that infiltration methods are not being used as the site is located within a Groundwater Source Protection Zone 1. The use of long term storage methods such as an attenuation tank or oversized pipes are being proposed. These overall methods lies at the bottom of the SuDS hierarchy and a satisfactory justification for not providing an above ground SuDS management approach should be provided.

Above ground measures such as ponds, swales etc. could be used on impermeable sites and utilised within green space and areas of landscaping. Prioritising above ground methods and providing source control measures such as infiltration trenches with an

artificial sub base can ensure that surface water run-off can be treated in a sustainable manner and reduce the requirement for maintenance of underground features.

Dispersed attenuation throughout the development will provide an opportunity to attenuate the surface water closer to source and allow for additional treatment stages. It will also present opportunities to slow the rate of flow of surface water throughout the development and therefore present more opportunity to manage the rate of discharge from the site. Please note that a 'lack of space' is not considered as an acceptable technical reason for not implementing the most appropriate SuDS measures.

3. We acknowledge that a discharge rate of 5l/s and attenuation of 100m³ is being proposed. However as this is a full planning application, we require detailed surface water run-off and volume calculations for the proposed SuDS components and pipe runs to ensure the drainage strategy has the capacity for all rainfall events up to and including the 1 in 100 year plus climate change event.

Surface water drainage calculations should be provided as evidence to support the proposed drainage strategy. These are required to ensure that site has the capacity for all rainfall events up to and including the 1 in 100 year plus climate change event and ensure there is no increase flood risk.

4. We note that a pre-application enquiry has been carried out however we require confirmation from Thames Water that they satisfied in principle with proposed volumes and run-off rates.

It may be that the information we have asked for above is included in the appendices. However there are missing pages and no further information can be found on the planning portal.

The applicant will need to satisfy the LPA that the proposed drainage scheme can be adopted and maintained for its lifetime by providing a maintenance plan, detailing key operations and management.

Informative to the LPA

The applicant can overcome our objection by submitting an surface water drainage assessment which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Production of an surface water drainage assessment will not in itself result in the removal of an objection.

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

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

7. Affinity Water

Description: 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, rooftop wind turbine, 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.

Thank you for notification of the above planning application. Planning applications are referred to us where our input on issues relating to water quality or quantity may be required.

You should be aware that the proposed development site is located within an Environment Agency defined groundwater Source Protection Zone (SPZ) corresponding to Hunton Bridge Pumping Station. This is a public water supply, comprising of a number of Chalk abstraction boreholes, operated by Affinity Water Ltd.

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

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

8. Thames Water

Waste Comments

Following initial investigation, Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Should the Local Planning Authority look to approve the application, Thames Water would like the following 'Grampian Style' condition imposed. "Development shall not 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. Should the Local Planning Authority consider the above recommendation is inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Control Department (telephone 0203 577 9998) prior to the Planning Application approval.

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.

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.

No impact piling 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) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

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.

Supplementary Comments

We have no objection for surface water drainage strategy. Regarding foul water drainage our initial investigation has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. We request that an impact study be undertaken to confirm the extent of any network reinforcement required.

9. Environment Agency

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, rooftop wind turbine, function room, and underground parking facilities for 313 cars in an automatic car parking system, with on site electric car scheme and electric bike share scheme.

Thank you for consulting us on the above planning application.

Please ensure the following conditions are included on any planning permission granted. Without these conditions the proposed development presents an unacceptable risk to the environment.

Condition 1 No development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), shall take place 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.

Condition 2 No occupation of any part of the permitted development shall take place until 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).

Condition 3 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).

Condition 4 Piling or any other foundation designs 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)

Condition 5 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).

Condition 6 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).

Condition 7 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).

Advice to Applicant

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.

10. Ministry of Defence

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.

Please refer to the Met Office for comments as they are now a statutory consultees under the

provisions of The Town and Country Planning (Safeguarded Meteorological Sites (England) Direction 2014.

11. Met Office

Original Plans;

Thank you for consulting the Met Office about the above planning application in your communication dated 2nd November.2015.

I am writing to inform you that the Met Office has concerns about the proposal and objects to it in its current form.

Our assessment has been carried out based on the wind turbines located on the roof of the proposed building will be.74.3m from ground level and therefore has a tip height of 162.8m AOO.

The turbines will be detectable by.the Met Office weather radar at Chenies which is approximately 6783m from the site. The development may result in significant degradation to the quality of the Met Office services as derived from weather radar data.

Wind turbines have been shown to have detrimental effects on the performance of Met Office weather radars. These effects include the blocking of radar in the vicinity of the turbines and the creation of false "clutter" returns, imitating or obscuring real precipitation signals.

Use of radar for meteorological purposes is the only means of observing key weather parameters (primarily information on precipitation distribution and intensity) that underpin essential operational forecast and warning services to UK forecasters and stakeholders including defence, aviation and other emergency responders (e.g. - flood risk) .
. The turbines will be undetectable by the Met Office weather radar at Chehies if they were reduced to 153.5m AOO which would therefore remove our concerns.
Alternatively, in this instance, mitigation may be possible for the majority of these impacts subject to agreement with the applicant.

As a result, if the planning authority is otherwise minded to grant planning permission, we would ask for the following condition to be applied:

No development shall commence unless and until the Met Office has confirmed in writing to the Planning Authority that Measures have been agreed to minimise the impact of the development on operations of the Met Office's weather radar at Chenies.

I hope this adequately explains our position on the matter. Further information about the effects of wind turbines on Met Office radio interests can be obtained from the following,

Amended Plans (roof turbine omitted);

Thank you for consulting the Met Office about the above planning application which has been amended to remove the wind turbines from the roof.
The application has been reviewed and we would be able to remove our previous objection which was based on our concerns regarding the turbines being in line of site with one of our radars. Our assessment has been carried out based on drawing BEA_DWG013_ V3.5 which

shows the development to have no wind turbines and a maximum height of 66.15m.

As a result, the Met Office has no objection to the proposal.

If the proposal is altered in any way, particularly relating to the height of the development, we must be consulted again.

I hope this adequately explains our position on the matter. If you require further information or would like to discuss this matter further please do not hesitate to contact me.

12. Highways England

No Objection

13. Herts County Council Highways

Revised TA Comments (Feb 2016);

Decision

Notice is given under article 18 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that the Hertfordshire County Council as Highway Authority does not wish to restrict the grant of permission subject to the following conditions:

Decision

Hertfordshire County Council, as Highway Authority, is satisfied that the applicant has met the requirements to address reasons for refusal outlined in previous HCC response. HCC therefore no longer objects to the proposed development, subject to conditions.

Conditions

Internal Layout: The applicant is required to utilise the proposed internal layout ?Mitigation Option 2: Layby and Additional Feeder Lane Arrangements ? provided in the second TA Addendum as a queue mitigation measure, received 29 January 2016, to satisfy that the queuing as a consequence of the Automatic Parking System (APS) will be contained within the site and will not encroach on the highway.

Reason: In the interests of highway safety and operation and to ensure minimal residual cumulative impacts occur as a consequence of the proposed development.

Highway Mitigation Measures: Prior to first occupation of the development, the applicant will be responsible for improvements to the highway network that will aim to ensure that the development will not have severe cumulative impacts to the highway network. The suggested mitigation measures will be agreed via S278 legal agreements and will include, at minimum, 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 and introduce MOVA (Microprocessor Optimised Vehicle Actuation) software at the Two Waters Road/ London Road signalised junction, and refresh Give Way markings on Whiteleaf Road.

Reason: In the interests of highway safety and to ensure minimal residual cumulative impacts occur as a consequence of the proposed development.

Car and Cycle Parking Management Plan: Prior to first occupation of the development, a Car and Cycle Parking Management Plan shall be submitted to and approved in writing by the local planning authority. It shall include the following:

- Details of car parking allocation and distribution;
- Details of the car club regarding the operation, management, and implementation scheme;
- Methods to minimise on-street car parking;
- A scheme for the provision and parking of cycles; and,
- Monitoring required of the Car and Cycle Parking Management Plan to be submitted to and approved in writing in accordance with a timeframe to be agreed by the local planning authority.

The Car and Cycle Parking Management Plan shall be fully implemented before the development is first occupied or brought into use, in accordance with a timeframe agreed by the local planning authority, and thereafter retained for this purpose.

Reason: In the interested of highway safety and to ensure sufficient available on-site car parking and the provision of adequate cycle parking that meets the needs of occupiers of the proposed development and in the interested of encouraging the use of sustainable modes of transport in accordance with Policies CS8 and CS12 of the Dacorum Core Strategy (September 2013) and saved Policies 57 and 58 of the Dacorum Borough Local Plan 1991-2011.

Travel Plan: Development shall not commence until a Full Travel Plan is provided that includes the measures detailed in the TA as part of the Framework Travel Plan section. The Full Travel Plan should be completed in accordance with HCC's Travel Plan Guidance and will be secured via a S106 Agreement.

Reason: In the interests of maintaining highway efficiency and safety.

SHC 18: Prior to the first occupation of the development hereby permitted (or Prior to the commencement of the use hereby permitted) a visibility splay measuring 2.4 x 43 m shall be provided to each side of the access where it meets the highway and such splays shall thereafter be maintained at all times free from any obstruction between 600mm and 2m above the level of the adjacent highway carriageway.

Reason: In the interests of highway safety.

SHC 22: Prior to the first occupation of the development hereby permitted (or Prior to the commencement of the use 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.

SHC 25: Development shall not commence until a scheme detailing provision for on-site parking for construction workers for the duration of the construction period has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented throughout the construction period.

Reason: To ensure adequate off-street parking during construction in the interests of highway safety.

SHC 26A: Prior to the commencement of any works a Construction Logistics Plan and Access Route which shall incorporate adequate provision for addressing any abnormal wear and tear to the highway shall be submitted to and approved in writing with the Local Planning Authority in consultation with Hertfordshire County Council Highway Authority together with proposals to control and manage construction traffic using the 'Construction Traffic Access Route' and to ensure no other local roads are used by construction traffic.

Reason: In the interests of maintaining highway efficiency and safety.

SHC 27A: No works shall commence on site until the details of wheel cleaning facilities for construction vehicles have been submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority.

Reason: To prevent extraneous material being deposited on the highway.

SHC 27B: For the duration of the construction period all traffic associated with the construction of the development permitted will use the approved wheel cleaning facilities provided referred to in condition SHC 27A.

Reason: To prevent extraneous material being deposited on the highway.

S278 Agreement

Any works within the highway boundary (including alterations to the footway and the proposed site access) will need to be secured and approved via a S278 Agreement with the HCC.

S106 Agreement and Contributions

A S106 Agreement will be required to secure any Construction and Logistics Plan Planning Obligations, including a Construction Traffic Management Plan and Full Travel Plan. Mitigation measures for the junctions will be required under a S106 Agreement. Additionally, planning obligations previously agreed as part of the agreed outline application from 26 June 2015 will still apply.

Description of the Proposal

The proposed development includes the demolition of an existing 4-storey office building and the erection of a 16-storey residential building with the following uses:

- 272 residential flats:
 - 12 studio flats
 - 119 1-bed flats
 - 115 2-bed flats
 - 26 3-bed flats
- On-site gym/ leisure centre, coffee shop, and function room
- Roof garden
- Internal arboretum
- Underground parking for 318 cars

The proposed new building will be arranged as follows:

- Basement levels: Parking
- Ground floor: Reception, coffee and function room
- 1st floor: Gym, flats
- 2nd ? 16th floors: Flats

The site is located at Symbio House, Whiteleaf Road, Hemel Hempstead. The site is on the south east side of Whiteleaf Road. On-street parking is not permitted on Whiteleaf Road; however it is permitted on London Road to the west of the junction with Whiteleaf Road. Whiteleaf Road is an unclassified L2 local access road.

The site is located in a semi-industrial area of Hemel Hempstead. Adjacent land uses include the Arriva bus depot and a car yard.

The application is accompanied by a Transport Assessment (TA). This is consistent with the level of assessment required in the Hertfordshire County Council (HCC) Roads in Hertfordshire: Design Guide 3rd Edition (RiH).

Two TA Addendums, received 21 December 2015 and 29 January 2016, were provided to address HCC concerns raised as part of original recommendation for refusal response.

Consented Scheme

As is mentioned through the TA that accompanies this planning application, the development has prior planning approvals and a consented scheme exists. The consented scheme was given approval 26 June 2015.

The proposed development in the consented scheme includes the demolition of an existing 4-storey building and the erection of a 16-storey residential building with the following uses:

- 208 residential flats:
 - 46 1-bed flats
 - 19 3-bed flats
- Office space ? 859 sqm

- On-site gym/ leisure centre, café, and function room (112 sqm + 290 sqm)
- Roof garden
- Internal arboretum
- Underground parking for 228 cars

The proposed new building will be arranged as follows:

- Basement levels: Parking
- Ground floor: Reception, café, office space, and function room
- 1st floor: Office, gym, flats
- 2nd ? 16th floors: Flats

The relevant TRICS (Trip Rates Information Computer System) outputs were provided as part of the ?Supplementary Transport Planning Information? package submitted after the initial application was reviewed, in support of the consented scheme. The TRICS outputs provided were approved and the consented scheme generated a net impact of 75 trips in the AM peak hour and 84 trips in the PM peak hour.

The distribution of vehicles was derived from the proportion of observed turning movements at the junctions, which were surveyed as part of the TA. The approach was approved as part of the consented scheme.

The assessment of the impacts the generated traffic would have on the highway were approved as part of the amendment response that was informed by the ?Supplementary Transport Planning Information? package. The supplementary information used gap analysis to justify that the junction at London Road and Whiteleaf Road could accommodate the increase in peak hour traffic.

The ?Supplementary Transport Planning Information? package provided to support the previous application provided detailed information about the PIC data and this was approved as part of the amendments to the original response.

Site access was approved as part of the consented scheme.

Swept path analyses were requested for the internal layout and underground car parking as part of the consented scheme conditions. The car parking has changed from underground parking to Automatic Parking System (APS) in the new application proposal.

Road Safety Audit was not requested as part of the consented scheme.

Servicing and delivery arrangements were not provided as part of the consented scheme and were to be requested as part of a condition or under Reserve Matters.

A Construction Traffic Management Plan was not provided as part of the consented scheme and was to be requested as part of a condition or under Reserve Matters.

A Framework Travel Plan was provided as part of the consented scheme. However, the Framework Travel Plan did not contain any targets and did not reference the HCC Travel Plan Guidance for Business and Residential Development (2014). Therefore, a Full Travel Plan was to be secured as part of a s106 agreement.

Analysis

A TA has been prepared by Nichols Consulting on behalf of Corona Properties in support of a planning application for the redevelopment of Symbio House at Whiteleaf Road, Hemel Hempstead.

The policy documents reviewed as part of the TA include:

- National Planning Policy Framework (March 2012)
- Dacorum Core Strategy (September 2013)
- Dacorum Local Plan 1991-2011, Appendix 5

Trip Generation and Distribution

The applicant has provided TRICS outputs as an Appendix in the TA. The TRICS outputs provided are appropriate for the land uses they are meant for. The trip generation and distribution profile made in the provided TA are similar to that found suitable within the Supplementary Transport Information and previous TA provided in an earlier application that was approved. As such, the conclusion prescribed in the TA is suitable.

Trip Generation

Existing Trip Generation

The proposed development is located on an office site that is no longer in use. The TRICS data provided within the TA provided trip generation rates for the current land use. The TRICS trip rates for the office space were provided using the land use 02 ? Employment ? A ? Office, and are as follows:

- AM Peak hour: 16 arrivals, 3 departures ? 19 total
- PM Peak hour: 3 arrivals, 14 departures ? 17 total

Consented ?Additional? Trip Generation

As was detailed above, the consented scheme included the following approved net impact trip generation:

- AM Peak hour: 12 arrivals, 63 departures - 75 total
- PM Peak hour: 60 arrivals, 24 departures ? 84 total

The TA proposes alternative trip generation numbers, as discussed in the preceding section.

Proposed Trip Generation

The applicant has undertaken an assessment of the likely trip generation being undertaken for the dwellings using the industry standard TRICS trip rate database.

One TRICS category was used for the purposes of the TA 03 ? Residential ? C ? Flats Privately Owned. The TA states that the total summary of the expected car trips for 272 dwellings based on TRICS trip rates are:

- AM Peak hour: 19 arrivals, 68 departures - 87 total
- PM Peak hour: 62 arrivals, 28 departures - 90 total

The TA states that the total net impact of the proposed development, when compared to the existing land use, will be as follows:

- AM Peak hour: 3 arrivals, 65 departures - 68 total

- PM Peak hour: 59 arrivals, 14 departures - 73 total

Therefore, the new proposed net impact trip generation numbers are 7 less in the AM peak hour and 11 less in the PM peak hour than those agreed as part of the consented scheme net impact.

The applicant has provided new information in the first TA Addendum received 21 December 2015. The TA Addendum provides information on the concerns raised with regards to the gym and café land uses and concerns raised with regards to the Aldi store trips. HCC is satisfied that the information provided addresses these concerns.

All concerns raised in the original application response with regards to trip generation have been addressed within the first TA Addendum.

Trip Distribution

Trip distribution was derived using the observed turning movements at the junctions surveyed. The proposed methodology is considered appropriate and is similar to that found suitable within the Supplementary Transport Information provided in the consented scheme. As such, the turning movements prescribed in the TA for the development are suitable.

Impact on the Highway

Transport Assessment

The original TA did not include junction modelling for either of the key local junctions. However, the analyses provided for the junctions has been previously approved as part of amendments to a prior application. The traffic survey data provided as part of this TA in Appendix E does not include the PM peak hour used to generate trips for the development.

The first TA Addendum received included traffic survey data undertaken for the PM peak hour. HCC is satisfied with the data provided.

Concerns were raised by HCC in response to the first TA Addendum. Increased traffic volumes at the London Road/ Whiteleaf Road junction raised concerns about capacity and junction operation. HCC recommended junction modelling for the London Road/ Whiteleaf Road and Two Waters Road/ London Road junctions. Results for the junction modelling were provided in a second TA Addendum received 29 January 2016 and further details were provided in documents received through

February to supplement the TA Addendum. HCC, in conjunction with Ringway, have reviewed the traffic modelling data in the second TA Addendum, and supplementary files, and are satisfied that the results are suitable and that the development will not result in severe cumulative impacts to the highway network. Furthermore, the APS system will only allow one or two vehicles to exit the parking at any given time and will therefore result in a maximum of 2 vehicles exiting the development site at approximately 60-90s intervals. The nature with which vehicles will be exiting the APS will reduce the propensity for platooning at the London Road/ Whiteleaf Road junction along the Whiteleaf Road approach. This further supports our view that the proposed development is not likely to result in severe cumulative impacts on the highway.

Road Safety

Personal Injury Collision (PIC) data have been submitted within the TA for the five year period 1 April 2010 to 31 March 2015 for the A414 Two Waters Road and the A4251 London Road in the area of the application site. The data demonstrate that there have been 38 collisions occurred resulting in 45 personal injuries within this five year period.

The TA provides the following summaries for each of the junctions analysed as part of the PIC data.

A414 Two Waters Road and A4251 London Road

Ten PICs are recorded at this junction with eleven personal injuries incurred by car occupants and two by pedestrians. Seven of the PICs involved vehicles coming into conflict while turning, changing lanes on approach to the junction or merging into an exit lane. The main contributing factors were failure to look by both drivers and pedestrians, disobeying traffic signals and stationary or parked vehicles.

A414 Two Waters Road and Corner Hall

Six PICs are recorded at this junction with four personal injuries incurred by car occupants and two by pedestrians. Three of the PICs involved vehicles coming into conflict while turning into or out of Corner Hall and three involved collision of moving vehicles with stationary ones waiting for turning movements to be completed. Main contributing factors included the misjudgement of other users' path or speed, careless or reckless driving, and slippery road surface.

A4251 London Road and Retail Park

Four PICs are recorded at this junction with seven personal injuries incurred by car occupants. All of the collisions involved vehicles coming into conflict whilst turning into or out of the Retail Park. The main contributing factor was failure to look properly.

A4251 London Road and Durrants Hill Road

Two PICs are recorded at this junction with one personal injury incurred by car occupants and one by a pedestrian. Reckless driving and inebriated pedestrian were the contributing factors.

A4251 London Road and Whiteleaf Road

Two PICs are recorded at this junction with two personal injuries incurred by car occupants. Both PICs involved turning movements into or out of Whiteleaf Road with drivers failing to look properly.

The TA concludes that the PIC clusters are expected at these junctions and it is not considered that the proposed development will contribute to deterioration in accident location, frequency or type. The conclusion made in the TA is similar to that found suitable within the Supplementary Transport Information package provided in the consented scheme. As such, the conclusion reached in the TA is suitable.

Highway Layout

Site Access

The vehicle and pedestrian access is proposed to be taken from Whiteleaf Road. The site access will be designed to achieve visibility splays of 2.4m x 43m.

The vehicle access will serve as the access to the Automatic Parking System (APS). There is an existing barrier from Whiteleaf Road to the vehicle access but this barrier does not appear to be retained in the proposed site plans. The vehicle access will be a vehicle crossover and a zebra crossing for pedestrians is shown on the proposed site plans.

As the development has changed the style of parking the swept path analyses for the car park are no longer required. However, a swept path analysis of the internal layout is required to demonstrate that the layout is acceptable for all users. As part of the first TA Addendum, swept path assessments for the electric car parking stations were provided. HCC has reviewed these and they are deemed suitable.

Visibility Splays

As previously stated, the site access will be designed to achieve visibility splays of 2.4m x 43m which is consistent with the requirements set out in the Manual for Streets for a 30mph road speed.

Servicing Arrangements

The TA states that the footprint of the site is not of sufficient size to accommodate appropriate turning manoeuvres within its boundary for servicing and delivery vehicles. The TA states that the worst case scenario for servicing and delivery vehicles is that they will service the site by either backing into the site access from Whiteleaf Road or back onto Whiteleaf Road from the site access, which is the current practice of the site. However, this manoeuvre will be required more frequently with the proposed development and the LPA should assess the feasibility of this option with the waste contractor. Furthermore, to facilitate this manoeuvre the development will provide 4.0m of headroom which the TA states is sufficient to accommodate a refuse vehicle. The TA states that the manoeuvre required into and out of the site access by servicing and delivery vehicles is a low risk manoeuvre as traffic flow on Whiteleaf Road is low. However, it has not been demonstrated that this conclusion is suitable as the traffic into and out of the development will be significantly higher than the previous use and may conflict with this manoeuvring.

The TA identifies a second option which requires acquiring an existing lay-by, which has the function of a turning head, between the development site and Arriva to the south for use by servicing and delivery vehicles. The applicant has stated they would expand and adapt the lay-by to make it suitable for use by the servicing and delivery vehicles. More detail about how the property will be accessed via the lay-by is required. As was acknowledged in the TA, S106 contributions and S278 agreement will be required for alterations and expansion of the lay-by. However, as this serves as a function head and is the last opportunity on public highway ? Whiteleaf Road ? that serves as a turning head, discussions are required to determine the feasibility of this option. Furthermore, servicing arrangements for refuse collection are intended to be located within 30m from the refuse storage area and the location of the lay-by exceeds this requirement.

Further information and clarification regarding servicing and delivery arrangements are required to be provided by way of a planning condition to support that servicing and deliveries can be undertaken safely and will not impact on the highway. The absence of this information at this stage is not seen as significant enough for the highway authority to recommend that permission be withheld.

Road Safety Audit

A Stage 1 Road Safety Audit will not be required for the development site access as the site access will remain unchanged. However, if the lay-by is acquired for use by the development for servicing and delivery vehicles, a Stage 1 Road Safety Audit will be required for the lay-by expansion and operation.

Parking

The development proposal has specified that 318 car parking spaces would be provided for the development, 5 of which will be electric car stations on the ground level. Dacorum Borough Council's residential parking standards were used in the TA and are summarised as follows for residential use C3:

- Studio ? 1.25 spaces maximum for vehicles
- 1 bedroom ? 1.25 spaces maximum for vehicles
- 2 bedroom ? 1.5 spaces maximum for vehicles
- 3 bedroom ? 2.25 spaces maximum for vehicles

Given the specified requirements outlined above, the standards lead to a maximum of 396 car parking spaces. The application site is located in a Zone 4 Accessibility Zone and therefore a reduction to 75% - 100% of maximum permitted parking provision applies. 75% of the maximum permitted parking provision equates to a total of 297 parking spaces. The 318 proposed spaces falls within the Zone 4 accessibility zone specifications for the residential portion of the development.

The applicant has provided proposed parking provisions and requirements for the proposed development using the Dacorum Borough Council's parking standards. However, it will be up to Dacorum Borough Council to comment on the acceptability of the number of spaces.

The applicant has provided support to confirm that the parking system will operate effectively and safely to avoid parking displacement onto the highway network. An approach was agreed with HCC to establish a suitable APS processing time considering the type of users and the anticipated time it will take each group to exit and enter their vehicles.

The second TA Addendum utilised the methodology suggested by HCC to establish an 87second cycle time. This is deemed suitable by HCC.

The TA predicts the queuing utilising two methods:

- 1) Average Demand Profile; and,
- 2) Normal Distribution Profile.

The average demand profile calculations demonstrate that the queuing will not queue back to Whiteleaf Road and therefore this method would demonstrate that the site can accommodate peak hour trip demands.

The normal distribution profile, however, yields a different outcome. This methodology shows that there will be queuing back onto Whiteleaf Road for a 10-15-minute period. An approximate queue of greater than 60m is likely to encroach on the neighbouring access to the Aldi store or queuing within an unacceptable distance to the junction with London Road. This is not considered acceptable.

It is considered that the current layout is inadequate to accommodate queues resulting from the APS parking system. However, the proposed alternative internal layout option, that includes laybys and an extra queuing lane, could provide appropriate on-site storage to accommodate the queuing.

HCC are satisfied that the proposed mitigation measures within the internal layout provided by the applicant, including laybys and an extra queuing lane, will accommodate the queues on entry to the APS and HCC therefore recommend removing this reason for refusal under the condition that this new internal layout is utilised. The applicant has provided suitable evidence to support that the development is unlikely to have a severe residual cumulative impact on the highway network as a consequence of the APS.

Disabled Parking

Where communal parking is proposed for over 20 units, 6% of the total number of spaces should be provided for exclusive disabled use plus 1 space of sufficient dimensions to be used by disabled persons for every 10 units. This should be provided over and above the general parking requirements. However, the proposed development will have an Automatic Parking System which does not require the provision of disabled spaces as the bays where car drivers and passengers leave the vehicle are sufficient to accommodate the needs of individuals requiring the use of disabled car parking spaces.

Cycle Parking

Dacorum Borough Council's residential cycle parking standards were used in the TA and are summarised as follows for residential use C3:

- Minimum 1 space per residential unit for cycle parking

The standard therefore requires a minimum 272 cycle spaces. The TA states that they will provide 264 secure and covered cycle spaces which is not in accordance with the cycle parking guidelines for

Dacorum Borough Council. However, it will be up to Dacorum Borough Council to comment on the acceptability of the number of spaces.

Accessibility

The proposed site, located, as it is, in Accessibility Zone 4, is not considered to be entirely sustainable or accessible to alternative modes of transport. Consequently, staff and residents are likely to be heavily reliant on private cars to access the site.

Public Transport

The nearest bus stops to the development site are on A414 Two Waters Road, and is over 250m walking distance away from the site. Both have passenger shelters but neither have easy access kerbing. Bus routes and frequencies serving these stops are set out below.

- Service No. 207: Marsworth ? Wiggington ? Hemel Hempstead (2 per day)
- Service No. 500/ 501: Aylesbury ? Hemel Hempstead ? Watford (4 per hour)
- Service No. H19: Abbots Langley ? Hemel Hempstead (1 per day ? Tuesdays and Thursday only)
- Service No. NHS1: Hemel Hempstead ? Watford (2/3 per day)

The nearest national rail station is Hemel Hempstead which is approximately 1 km or a 15 minute walk from the development site. The station is on the east coast main line between London Euston and Birmingham New Street stations. To the SE Apsley station is approximately 0.9 miles away.

Walking and Cycling

Both A414 Two Waters Road and A4215 London Road have continuous footways on both sides, and the signalised junction of these two roads provides for all pedestrian movements with refuges.

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 A4215 London Road. There are no National Cycle Network routes or other off road routes in the vicinity of the application site.

Travel Plan

A Framework Travel Plan (FTP) has been provided as part of the TA. The FTP does not contain any targets. The targets should be based on achieving a suitable mode split as suggested as part of the trip generation analysis.

A Full Travel Plan, in accordance with HCC's Travel Plan Guidance will be required and secured via a S106 Agreement. The Full Travel Plan should include the measures outlined in the FTP to encourage sustainable travel and promote the travel plan. Funding for these measures should be secured via a S106 Agreement.

Objectives

These should focus on reducing single occupancy vehicle trips.

Structure

This provides an outline action plan. The following details should be considered and incorporated:

- Confirm support by securing budget?
- Full time travel plan coordinator? Who will they be employed by?
- Baseline travel conditions. This would presumably be estimated pre-occupation through Census and similar data. Following part occupation initial travel monitoring could be undertaken. This would need to include multi-modal counts conforming to TRICS SAM (Standardised Assessment Methodology), as well as behavioral questionnaires
- Mode share targets should be SMART?
- Monitoring should be undertaken for at least five years following full occupation, and reported to HCC

Measures

Noted that this does not represent a comprehensive list, and is instead an indicative representation. 208 flats: would suggest that car club could comprise more than 5 electric cars and car parking spaces.

Construction

The TA and Design & Access Statement do not contain specific information regarding the potential impacts on the highway network during the construction of the proposed development despite the site's sensitive location. However, a Draft Construction Method Statement was provided that

highlights the various phases of construction. The 'Draft Construction Method Statement' does not contain the information required as part of a Construction Logistics Plan (CLP).

The TA acknowledges the need for a CLP and commits the applicant to providing one with the following major items:

- Programme to determine different major stages of construction such as site establishment, excavation of basements, etc.
- Quantification of daily construction vehicle trip generation for each phase.
- Identification of construction traffic routes and any temporary traffic management measures and pedestrian provisions that may be required.
- Construction site layout to include: site offices and welfare facilities, stores, wheel washing, hard standing areas, etc.
- Off-site vehicle waiting, call off, marshalling and security.

Given the significant size and small location of the development, the applicant should prepare a CLP detailing how the potential construction impacts on pedestrians and vehicles will be managed and should be secured via a Section 106 agreement.

Planning Obligations / Community Infrastructure Levy (CIL)

Dacorum Borough Council has a community infrastructure levy and contributions towards local transport scheme will be sought via CIL and/or S106 contributions above those previously agreed 26 June 2015, if appropriate.

Conclusion

HCC is satisfied that the applicant has met all the concerns raised in the original recommendation for refusal. HCC will recommend changing the recommendation to grant with conditions.

Original Comments (dec 2015):

Proposal

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, rooftop wind turbine, 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.

Decision

Notice is given under article 18 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that the Hertfordshire County Council as Highway Authority recommends that permission be refused for the following reasons:

HCC objects to the proposed development, due to a lack of information provided by the applicant justifying the proposal will not impact on the highway safety. The following issues need to be resolved by the applicant:

- Consented scheme included trip generation for the café and gym and stated they would likely be used predominantly by the residents and employees of the office. However, in the new scheme, the café and gym have been removed from the trip generation profile for the development and is being considered for the sole use of residents and employees of the office. The applicant is required to provide appropriate justification regarding how the café and gym will be monitored for the sole use of residents and employees of the office space, or include the café and gym as part of the trip generation profile.
- The traffic data provided in the TA, Appendix E – Traffic Survey Data, is from 25 June 2014 and does not include the PM peak hour used for the trip generation profiles, 5.00pm – 6.00pm. The traffic survey data provided as part of the TA is not suitable for the analysis and appropriate traffic survey data is required within the TA. Furthermore, it is not clear whether the Aldi store trip generation volumes were considered within the total traffic flows and are required to be considered as part of the existing traffic volumes.
- The applicant will need to provide evidence to support that the APS can safely and efficiently process peak period demand without vehicles queuing onto Whiteleaf Road.
- The electric car parking spaces are located along the perimeter of the development with access to/from the APS access road. Swept path assessments are required for the electric car parking spaces to demonstrate that the location and orientation of the spaces are safe and operationally acceptable.

However, if Dacorum Borough Council considers that the development should be permitted, the below conditions would be required, at a minimum. Car and Cycle Parking Management Plan: Prior to first occupation of the development, a Car and Cycle Parking Management Plan shall be submitted to and approved in writing by the local planning authority. It shall include the following: • Details of car parking allocation and distribution; • Details of the car club regarding the operation, management, and implementation scheme; • Methods to minimise on-street car parking; • A scheme for the provision and parking of cycles; and, • Monitoring required of the car and cycle management plan to be submitted to and approved in writing in accordance with a timeframe to be agreed by the local planning authority.

The Car and Cycle Parking Management Plan shall be fully implemented before the development is first occupied or brought into use, of in accordance with a timeframe agreed by the local planning authority, and thereafter retained for this purpose. Reason: In the interested of highway safety and to ensure sufficient available on-site car parking and the provision of adequate cycle parking that meets the needs of occupiers of the proposed

development and in the interested of encouraging the use of sustainable modes of transport in accordance with Policies CS8 and CS12 of the Dacorum Core Strategy (September 2013) and saved Policies 57 and 58 of the Dacorum Borough Local Plan 1991-2011.

Swept Path Assessment: Development shall not commence until a swept path assessment of the interior layout and electric car park stations have been provided to demonstrate that the layout is safe and operationally acceptable. Reason: In the interests of highway safety.

Automatic Parking System (APS): Development shall not commence until sufficient evidence of the APS' ability to safely and efficiently handle peak hour traffic is provided. Reason: To ensure adequate operations and short queue lengths for residents parking, in the interests in highway safety.

Travel Plan: Development shall not commence until a Full Travel Plan is provided that includes the measures detailed in the TA as part of the Framework Travel Plan section. The Full Travel Plan should be completed in accordance with HCC's Travel Plan Guidance and will be secured via a

S106 Agreement. Reason: In the interests of maintaining highway efficiency and safety.

SHC 18: Prior to the first occupation of the development hereby permitted (or Prior to the commencement of the use hereby permitted) a visibility splay measuring 2.4 X 43 metres shall be provided to each side of the access where it meets the highway and such splays shall thereafter be maintained at all times free from any obstruction between 600mm and 2m above the level of the adjacent highway carriageway. Reason: In the interests of highway safety.

SHC 22: Prior to the first occupation of the development hereby permitted (or Prior to the commencement of the use 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.

SHC 25: Development shall not commence until a scheme detailing provision for on-site parking for construction workers for the duration of the construction period has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented throughout the construction period. Reason: To ensure adequate off-street parking during construction in the interests of highway safety.

SHC 26A: Prior to the commencement of any works a Construction Logistics Plan and Access Route which shall incorporate adequate provision for addressing any abnormal wear and tear to the highway shall be submitted to and approved in writing with the Local Planning Authority in consultation with Hertfordshire County Council Highway Authority together with proposals to control and manage construction traffic using the 'Construction Traffic Access Route' and to ensure no other local roads are used by construction traffic. Reason: In the interests of maintaining highway efficiency and safety.

SHC 27A: No works shall commence on site until the details of wheel cleaning facilities for construction vehicles have been submitted to and approved in writing by the Local Planning

Authority in consultation with the Highway Authority. Reason: To prevent extraneous material being deposited on the highway.

SHC 26B: For the duration of the construction period all traffic associated with the construction of the development permitted will use the approved wheel cleaning facilities provided referred to in Part A. Reason: To prevent extraneous material being deposited on the highway.

S278 Agreement Any works within the highway boundary (including alterations to the footway and the proposed site access) will need to be secured and approved via a S278 Agreement with the HCC.

S106 Agreement and Contributions A S106 Agreement will be required to secure any Construction and Logistics Plan Planning Obligations, including a Construction Traffic Management Plan and Full Travel Plan. Mitigation measures for the junctions will be required under a S106 Agreement.

Description of the Proposal The proposed development includes the demolition of an existing 4 storey office building and the erection of a 16 storey residential building with the following uses: • 272 residential flats: o 12 x studio flats o 119 x 1 bed flats o 115 x 2 bed flats o 26 x 3 bed flats • On-site gym/leisure centre, coffee shop, and function room • Roof garden • Internal arboretum • Underground parking for 318 cars The proposed new building will be arranged as follows: • Basement levels: Parking • Ground floor: Reception, Coffee and Function room • 1st floor: Gym, flats • 2nd – 16th floor: Flats The site is located at Symbio House, Whiteleaf Road, Hemel Hempstead. The site is on the south east side of Whiteleaf Road. On-street parking is not permitted on Whiteleaf Road; however it is permitted on London Road to the west of the junction with Whiteleaf Road. Whiteleaf Road is an unclassified L2 local access road. The site is located in a semi-industrial area of Hemel Hempstead. Adjacent land uses include the Arriva bus depot and a car yard. The application is accompanied by a Transport Assessment (TA). This is consistent with the level of assessment required in the Hertfordshire County Council (HCC) Roads in Hertfordshire: Design Guide 3rd Edition (RiH).

Consented Scheme As is mentioned through the TA that accompanies this planning application, the development has prior planning approvals and a consented scheme exists. The consented scheme was given approval 20 October 2014 as part of an amendment. The proposed development in the consented scheme includes the demolition of an existing 4-storey building and the erection of a 16-storey residential building with the following uses: • 208 residential flats: o 46 x 1 bed flats o 143 x 2 bed flats o 19 x 3 bed flats • Office space – 859 sqm • On-site gym/leisure centre, café, and function room (112 sqm + 290 sqm) • Roof garden • Internal arboretum • Underground parking for 228 cars The proposed new building will be arranged as follows: • Basement levels: Parking • Ground floor: Reception, Café, Office Space, and Function room • 1st floor: Office, gym, flats • 2nd – 16th floor: Flats The consented scheme had provided the relevant TRICS outputs as part of the “Supplementary Transport Planning Information” package submitted after the initial application was reviewed. The TRICS outputs provided were approved and the consented scheme generated a net impact of 75 trips in the AM peak hour and 84 trips in the PM peak hour. The distribution of vehicles was derived from the proportion of observed turning movements at the junctions, which were surveyed as part of the TA. The approach was approved as part of the consented scheme. The assessment of the impacts the generated traffic would have on the highway were

approved as part of the amendment response that was informed by the “Supplementary Transport Planning Information” package. The supplementary information used gap analysis to justify that the junction at London Road and Whiteleaf Road can accommodate the increase in peak hour traffic. The “Supplementary Transport Planning Information” package provided to support the previous application provided detailed information about the PIA data and this was approved as part of the amendments to the original response. Site access was approved as part of the consented scheme. Swept path analyses were requested for the internal layout and underground car parking as part of the consented scheme conditions. The car parking has changed from underground parking to Automatic Parking System (APS) in the new application proposal. Road Safety Audit was not requested as part of the consented scheme. Servicing and delivery arrangements were not provided as part of the consented scheme and were to be requested as part of a condition or under Reserve Matters. Construction Traffic Management Plan was not provided as part of the consented scheme and was to be requested as part of a condition or under Reserve Matters. A Framework Travel Plan was provided as part of the consented scheme. However, the Framework Travel Plan did not contain any targets and did not reference the HCC Travel Plan Guidance for Business and Residential Development (2014). Therefore, a Full Travel Plan was to be secured as part of a s106 agreement.

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Trip Generation Existing Trip Generation The proposed development is located on an office site that is no longer in use. The TRICS data provided within the TA provided trip generation rates for the current land use. The TRICS trip rates for the office space were provided using the land use 02 – Employment – A – Office, and are as follows: • AM Peak hour: 16 arrivals, 3 departures – 19 total • PM Peak hour: 3 arrivals, 14 departures – 17 total
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Proposed Trip Generation The applicant has undertaken an assessment of the likely trip generation being undertaken for the dwellings using the industry standard TRICS trip rate database. One TRICS category was used for the purposes of the TA 03 – Residential – C – Flats Privately Owned. The TA states that the total summary of the expected car trips for 272 dwellings based on TRICS trip rates are: • AM Peak hour: 19 arrivals, 68 departures - 87 total • PM Peak hour: 62 arrivals, 28 departures - 90 total The TA states that the total net impact of

the proposed development, when compared to the existing land use, will be as follows: • AM Peak hour: 3 arrivals, 65 departures - 68 total • PM Peak hour: 59 arrivals, 14 departures - 73 total Therefore, the new proposed net impact trip generation numbers are 7 less in the AM peak hour and 11 less in the PM peak hour than those agreed as part of the consented scheme net impact. The gym and café were considered as part of the trip generation in the consented scheme but have not been considered as part of the current scheme. In the consented scheme the TA concluded that it was likely that the café and gym would be used solely by the residents and employees of the office. However, in the new scheme, the TA states that they will be for the sole use of the residents and the employees of the office. As such, the applicant will need to provide further justification with regards to how access to the café and gym will be regulated for the sole use of residents and employees, or include both uses as part of the trip generation profile for the new scheme. Therefore, more information is required as part of the analysis in the TA.

Trip Distribution Trip distribution was derived using the observed turning movements at the junctions surveyed. The proposed methodology is considered appropriate and is similar to that found suitable within the Supplementary Transport Information provided in the consented scheme. As such, the turning movements prescribed in the TA for the development are suitable.

Impact on the Highway Transport Assessment The TA does not include junction modelling for either of the analysed junctions. However, the analyses provided for the junctions has been previously approved as part of amendments to a prior application. However, the traffic survey data provided as part of this TA in Appendix E does not include the PM peak hour used to generate trips for the development and it is not clear whether the trips generated by the Aldi store have been included as part of the total traffic volumes discussed below.

Whiteleaf Road and London Road Junction Total observed flows, as stated in the TA, at the junction were observed to be 868 in the AM peak and 926 in the PM peak and includes consideration of traffic generated by the Aldi store. The development traffic results in a total junction throughput increase of 7.8% in the AM peak and 7.9% in the PM peak per the TA. The TA concludes that the introduction of development traffic at this junction is comfortably within capacity. However, the traffic data provided in the TA, Appendix E – Traffic Survey Data, is from 25 June 2014 and does not include the PM peak hour used for the trip generation profiles, 5.00pm – 6.00pm. The traffic survey data provided as part of the TA is not suitable for the analysis of the junction and appropriate traffic survey data is required within the TA. Furthermore, it is not clear whether the Aldi store trip generation volumes were considered within the total traffic flows and are required to be considered as part of the existing traffic volumes at the junction.

Two Waters Road and London Road Junction Total observed flows, as stated in the TA, at the junction were observed to be 3515 in the AM peak and 3560 in the PM peak and includes consideration of traffic generated by the Aldi store. The development traffic results in a total junction throughput increase of 1.6% in the AM peak and 1.6% in the PM peak per the TA. The TA concludes that the introduction of development traffic at this junction is comfortably within capacity. However, the traffic data provided in the TA, Appendix E – Traffic Survey Data, is from 25 June 2014 and does not include the PM peak hour used for the trip generation profiles, 5.00pm – 6.00pm. The traffic survey data provided as part of the TA is not suitable for the analysis of the junction and appropriate traffic survey data is required within the TA. Furthermore, it is not clear whether the Aldi store trip generation volumes

were considered within the total traffic flows and are required to be considered as part of the existing traffic volumes at the junction.

Road Safety Personal Injury Collision (PIC) data has been submitted within the TA for the five year period 1 April 2010 to 31 March 2015 for the A414 Two Waters Road and the A4251 London Road in the area of the application site. The data demonstrates that there have been 38 PICs occurred resulting in 45 personal injuries within this five year period. The TA provides the following summaries for each of the junctions analysed as part of the PIC data. A414 Two Waters Road and A4251 London Road Ten PICs are recorded at this junction with eleven personal injuries incurred by car occupants and two by pedestrians. Seven of the PIAs involved vehicles coming into conflict while turning, changing lanes on approach to the junction or merging into an exit lane. The main contributing factors were failure to look by both drivers and pedestrians, disobeying traffic signals and stationary or parked vehicles. A414 Two Waters Road and Corner Hall Six PICs are recorded at this junction with four personal injuries incurred by car occupants and two by pedestrians. Three of the PIAs involved vehicles coming into conflict while turning into or out of Corner Hall and three involved collision of moving vehicles with stationary ones waiting for turning movements to be completed. Main contributing factors included the misjudgement of other users' path or speed, careless or reckless driving, and slippery road surface. A4251 London Road and Retail Park Four PICs are recorded at this junction with seven personal injuries incurred by car occupants. All of the collisions involved vehicles coming into conflict whilst turning into or out of the Retail Park. The main contributing factor was failure to look properly. A4251 London Road and Durrants Hill Road Two PICs are recorded at this junction with one personal injury incurred by car occupants and one by a pedestrian. Reckless driving and inebriated pedestrian were the contributing factors. A4251 London Road and Whiteleaf Road Two PICs are recorded at this junction with two personal injuries incurred by car occupants. Both PIAs involved turning movements into or out of Whiteleaf Road with drivers failing to look properly. The TA concludes that the PIC clusters are expected at these junctions and it is not considered that the proposed development will contribute to deterioration in accident location, frequency or type. The conclusion made in the TA is similar to that found suitable within the Supplementary Transport Information package provided in the consented scheme. As such, the conclusion prescribed in the TA is suitable.

Highway Layout

Site Access The vehicle and pedestrian access is proposed to be taken from Whiteleaf Road. The site access will be designed to achieve visibility splays of 2.4m x 43m. The vehicle access will serve as the access to the Automatic Parking System (APS). There is an existing barrier from Whiteleaf Road to the vehicle access but this barrier does not appear to be retained in the proposed site plans. The vehicle access will be a vehicle crossover and a zebra crossing for pedestrians has been provided on the site plans. As the development has changed the style of parking the swept path analyses for the car park are no longer required. However, a swept path analysis of the internal layout is required to demonstrate that the layout is acceptable for all users. Included as part of the swept path analyses should be the 5 identified electric car park stations situated along the outside of the building's footprint and along the parking access road. The location of all the electric car park stations present safety concerns for those accessing or egressing from the parking spaces. A swept path assessment of the interior layout and electric car park stations should be provided by condition to demonstrate that the layout is safe and operationally acceptable. **Visibility Splays** As previously stated, the

site access will be designed to achieve visibility splays of 2.4m x 43m which is consistent with the requirements set out in the Manual for Streets for a 30mph road speed.

Servicing Arrangements The TA states that the footprint of the site is not of sufficient size to accommodate appropriate turning manoeuvres within its boundary for servicing and delivery vehicles. The TA states that the worst case scenario for servicing and delivery vehicles is that they will service the site by either backing into the site access from Whiteleaf Road or back onto Whiteleaf Road from the site access, which is the current practice of the site. However, this manoeuvre will be required more frequently with the proposed development and the LPA should assess the feasibility of this option with the waste contractor. Furthermore, to facilitate this manoeuvre the development will provide 4.0m of headroom which the TA states is sufficient to accommodate a refuse vehicle. The TA states that the manoeuvre required into and out of the site access by servicing and delivery vehicles is a low risk manoeuvre as traffic flow on Whiteleaf Road is low. However, it has not been demonstrated that this conclusion is suitable as the traffic into and out of the development will be significantly higher than the previous use and may conflict with this manoeuvring. The TA identifies a second option which requires acquiring an existing lay-by, which has the function of a turning head, between the development site and Arriva to the south for use by servicing and delivery vehicles. The applicant has stated they would expand and adapt the lay-by to make it suitable for use by the servicing and delivery vehicles. More detail about how the property will be accessed via the lay-by is required. As was acknowledged in the TA, S106 contributions and S278 agreement will be required for alterations and expansion of the lay-by. However, as this serves as a function head and is the last opportunity on public highway – Whiteleaf Road – that serves as a turning head, discussions are required to determine the feasibility of this option. Furthermore, servicing arrangements for refuse collection are intended to be located within 30m from the refuse storage area and the location of the lay-by exceeds this requirement. Further information and clarification regarding servicing and delivery arrangements are required to support that servicing and deliveries can be undertaken safely and will not impact on the highway. Road Safety Audit A Stage 1 Road Safety Audit will not be required for the development site access as the site access will remain unchanged. However, if the lay-by is acquired for use by the development for servicing and delivery vehicles, a Stage 1 Road Safety Audit will be required for the lay-by expansion and operation.

Parking The applicant has chosen to introduce an Automated Parking System (APS) in lieu of the previously agreed underground parking in the consented scheme. The APS consists of three components: 1. Entry/exit bays where cars are left and collected by drivers. 2. Parking places where cars are stored. 3. Main Transport Unit (MTU) which collects the car from an entry bay and places it in a parking space and retrieves the car from a parking place and places it in the exit bay. The TA states that the APS can process cars quickly, provides added security and is environmentally friendly due to decreased emissions as a consequence of car park circulation. The TA states the APS can process a car in an average 90 seconds and that it can process on average 120 vehicles in an hour. However, one bay can process 40 vehicles in an hour with a 90 second process time, therefore the proposed 2 bays would process 80 vehicles. The TA states that there is approximately 60m of storage space along the access road on the development site for vehicles waiting to park using the APS facility. The 60m of storage equates to approximately 10 waiting vehicles. However, it is unclear if the 60m of storage place considers the pedestrian crossing as inclusive storage length. The pedestrian crossing length should not be considered as part of the storage length as a pedestrian crossing is not to be obstructed. The development proposal has specified that 318 car parking spaces

would be provided for the development, 5 of which will be electric car stations on the ground level. Dacorum Borough Council's residential parking standards were used in the TA and are summarized as follows for residential use C3: • Studio – 1.25 spaces maximum for vehicles • 1 bedroom – 1.25 spaces maximum for vehicles • 2 bedroom – 1.5 spaces maximum for vehicles • 3 bedroom – 2.25 spaces maximum for vehicles Given the specified requirements outlined above, the standards lead to a maximum of 396 car parking spaces. The application site is located in a Zone 4 Accessibility Zone and therefore a reduction to 75% - 100% of maximum permitted parking provision applies. 75% of the maximum permitted parking provision equates to a total of 297 parking spaces. The 318 proposed spaces falls within the Zone 4 accessibility zone specifications for the residential portion of the development. The applicant has provided proposed parking provisions and requirements for the proposed development using the Dacorum Borough Council's parking standards. However, it will be up to Dacorum Borough Council to comment on the acceptability of the number of spaces. The applicant will need to provide support to confirm that the parking system will operate effectively and safely to avoid parking displacement onto the highway network.

Disabled Parking Where communal parking is proposed for over 20 units, 6% of the total number of spaces should be provided for exclusive disabled use plus 1 space of sufficient dimensions to be used by disabled persons for every 10 units. This should be provided over and above the general parking requirements. However, the proposed development will have an Automatic Parking System which does not require the provision of disabled spaces as the bays where car drivers and passengers leave the vehicle are sufficient to accommodate the needs of individuals requiring the use of disabled car parking spaces.

Cycle Parking Dacorum Borough Council's residential cycle parking standards were used in the TA and are summarized as follows for residential use C3: • Minimum 1 space per residential unit for cycle parking The standard therefore requires a minimum 272 cycle spaces. The TA states that they will provide 264 secure and covered cycle spaces which is not in accordance with the cycle parking guidelines for Dacorum Borough Council. However, it will be up to Dacorum Borough Council to comment on the acceptability of the number of spaces.

Accessibility The proposed site is not considered to be entirely sustainable or accessible to alternative modes of transport. Consequently, staff and residents are likely to be heavily reliant on private vehicles to access the site. **Public Transport** The nearest bus stops to the development site are on A414 Two Waters Road, and is over 250m walking distance away from the site. Bus routes and frequencies serving these stops are set out below. • Service No. 207: Marsworth – Wiggington – Hemel Hempstead (2 per day) • Service No. 500/501: Aylesbury – Hemel Hempstead – Watford (4 per hour) • Service No. H19: Abbots Langley – Hemel Hempstead (1 per day – Tuesdays and Thursday only) • Service No. NHS1: Hemel Hempstead – Watford (2/3 per day) The nearest national rail station is Hemel Hempstead Station located approximately 1 km or 15 minute walk from the development site. The station is on the main line between London Euston and Birmingham New Street stations.

Walking and Cycling Both A414 Two Waters Road and A4215 London Road have continuous footways on both sides, and the signalised junction of these two roads provides for all pedestrian movements with refuges. 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 A4215 London Road. There are no National Cycle Network routes or other off road routes in

the vicinity of the application site. HCC Public Transport Officer has responded to the application and their comments regarding the development are displayed below.

BUS The nearest bus stops are a pair located on the A414 (Two Waters Road), to the north of the proposed development. The northbound one is approximately 200m from the proposed development, the southbound stop approx. 30m further away. Both have shelters, neither have easy access kerbing. Bus services are as follows: - 500/501 Aylesbury-Watford Mon-Fri x3/hr, Sat 1/2 hrly, no Sun - H19 Abbots Langley-H. Hempstead Tues & Thurs only x1 each way The Transport Assessment mentions the 207 which does not stop at these stops and is only a very limited service and the NHS1 which no longer runs.

RAIL Hemel Hempstead station is approx 0.7 miles west of the site off the A4251. Trains are run by London Midland and Southern and journey time into London Euston is between 27 and 33 mins. Apsley station is also accessible - approx. 0.9 miles east.

OTHER COMMENTS This planning application is similar to a previous one that has gained planning permission but with removal of office and retail elements and an increased number of residential flats (from 208 to 272). This is relevant in the consideration of travel patterns from the site. The site is located close to the junction of the A414 Two Waters Rd and A4251. The A414 gives access to the A41 just south of the site. The site is therefore well located in terms of access to the highway network. The site itself is currently surrounded by industrial and commercial land uses including the Arriva depot and car sales. In relation to sustainable transport options, there are bus stops within recommended accessibility criteria on Two Waters Rd and frequent services available in the form of the 500/501 route which gives access to the town centre and surrounding towns. There are footways available on London Rd and Two Waters Rd in the vicinity of the site however the environment does not appear pedestrian friendly. Whilst Whiteleaf Rd is a no through road it does provide access to other businesses, including a bus depot, which would influence the types of vehicles using this road. There are pedestrian crossings on the Two Waters Rd/London Rd junction but you have to negotiate 4 of these to cross one arm of the junction if you were to access the bus stops the other side or be travelling on to the town centre. Both Hemel Hempstead and Apsley rail stations are within cycling distance, but as the TA states there are no specific provisions for cyclists (cycle lanes or advanced stop lines) on A414 or A4251 and no National Cycle Network or other off road routes in the vicinity. There is also no assessment of the site's accessibility to various services/facilities. If developer contributions are being sought from this site, these should be used towards measures to encourage the use of sustainable modes of transport to make walking, cycling and bus use more attractive. In relation to bus accessibility, neither of the nearest bus stops have easy access kerbing or departure screens. Easy access kerbing costs approx. £8000 per stop, departure screens also £8000 (including maintenance) so a contribution of £32,000 would be appropriate. We would also support measures to improve pedestrian and cycle facilities in the vicinity of the site.

Travel Plan A Framework Travel Plan (FTP) has been provided as part of the TA. The FTP does not contain any targets. The targets should be based on achieving a suitable mode split as suggested as part of the trip generation analysis. A Full Travel Plan, in accordance with HCC's Travel Plan Guidance will be required and secured via a S106 Agreement. The Full Travel Plan should include the measures outlined in the FTP to encourage sustainable travel and promote the travel plan. Funding for these measures should be secured via a S106 Agreement. HCC Sustainable Transport and Development Officer has responded to the application and their comments regarding the development are displayed below.

Framework travel plan feedback (19/11/2015)

Sustainability analysis Roads in vicinity of site (A414 and A4251) are not necessarily the most conducive to cycling; recommend including a measure to work with local authorities to improve connectivity by active travel modes. Potential for enhancing sustainable access to Hemel Hempstead and Apsley rail stations, and Grand Union Canal Towpath. Station provides good access north and south along the West Coast Main Line, and towpath gives an off-road cycle route from Watford to Hemel Hempstead. Nearest bus stops (London Road) includes Arriva 500 Watford to Aylesbury (approximately every 20 minutes Monday to Friday, and every 30 minutes Saturday). Other services less frequent (H19, 207, 501 all one service per day or fewer).

Objectives Sensible objectives, may wish to focus in particular on reducing single occupancy vehicle trips.

Structure This provides an outline action plan. Following details should be considered and incorporated:

- Confirm support by securing budget?
- Full time travel plan co-ordinator? Who will they be employed by?
- Baseline travel conditions. This would presumably be estimated pre-occupation through Census and similar data. Following part occupation initial travel monitoring could be undertaken. This would need to include multi-modal counts conforming to Trics SAM methodology, as well as behavioural questionnaires
- Mode share targets should be 'SMART'
- Monitoring should be undertaken for at least five years following full occupation, and reported to HCC

Measures Noted that this does not represent a comprehensive list, and is instead an indicative representation. 208 flats: would suggest that car club could comprise more than 5 electric cars and car parking spaces.

Conclusion Agreed that a more comprehensive site travel plan with a thorough implementation and monitoring plan will need to be developed in order to discharge planning permission condition.

Construction The TA and Design and Access Statement do not contain specific information regarding the potential impacts on the highway network during the construction of the proposed development. However, a 'Draft Construction Method Statement' was provided that highlights the various phases of construction. The 'Draft Construction Method Statement' does not contain the information required as part of a Construction Logistics Plan (CLP). The TA does acknowledge the need for a CLP and will provide one with the following major items:

- Programme to determine different major stages of construction such as site establishment, excavation of basements, etc.
- Quantification of daily construction vehicle trip generation for each phase.
- Identification of construction traffic routes and any temporary traffic management measures and pedestrian provisions that may be required.
- Construction site layout to include: site offices and welfare facilities, stores, wheel washing, hard standing areas, etc.
- Off-site vehicle waiting, call off, marshalling and security. Given the significant size and small location of the development, the applicant should prepare a CLP detailing how the potential construction impacts on pedestrians and vehicles will be managed and should be secured via a Section 106 agreement.

Planning Obligations / Community Infrastructure Levy (CIL) Dacorum Borough Council has a community infrastructure levy and contributions towards local transport scheme will be sought via CIL and/or S106 contributions, if appropriate.

HCC Response to Transport Assessment – Addendum 21/12/2015

Applicant Response	HCC Response
Gym Clarification.	Noted.
Café Clarification.	Noted.
Traffic Surveys	<p>The TA addendum did not include discussion about the junction of Whiteleaf Road and London Road. When comparing the new traffic survey data for the PM Peak Hour to the data used in the original TA, there was a 35% increase in total traffic through this junction. Additionally, there is a significant traffic increase for westbound traffic on London Road that will create added conflicting traffic for vehicles turning right from Whiteleaf Road. There is 114 vehicles making right turns from Whiteleaf Road before the introduction of development traffic and the development will add an additional 20 vehicles to this number.</p> <p>The use of gap analysis in this situation is not acceptable and junction modelling is required as the development is still adding 7.4% traffic to the junction. However, considering the gap analysis approach, the gap range has changed to 4.1 – 6.1s. It is acknowledged that the gap analysis approach was approved before, however it is not considered appropriate with the new information received.</p> <p>It is recommended that junction modelling be undertaken for the Whiteleaf Road/ London Road junction.</p>
Aldi Trips	Noted.
APS Capacity	<p>While a 60 second retrieval time suggests that the system can process 120 vehicles in an hour, this does not include the time it takes for people to input the tickets to access vehicles, obtain ticket upon dropping of their vehicle, load and/or unload their vehicles and depart the lift, etc.</p> <p>There is no time restriction set on the amount of time residents will have to exit/enter their vehicles and there will therefore likely be delays as a consequence of individuals loading/unloading from the vehicle.</p> <p>Sufficient evidence to support that the APS can safely and efficiently process peak period demand without vehicles queuing onto Whiteleaf Road has not been provided.</p>
APS Failure	Noted.
Access to Electric Car Parking Spaces	<p>The swept path assessments provided demonstrate that manoeuvring into and out of the electric parking spots is possible; however, these manoeuvres require the use of lift bay 2 which will potentially create safety and operational issues within the site during the peak hours.</p> <p>As this is an internal layout issue and will not likely impact on</p>

	the highway, the suitability of the parking bays has been proven sufficiently for HCC to remove this requirement as a point of refusal.
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14. Strategic Planning

Original Comments;

You have asked SPAR for comments on the above.

Please see the comments below on the original approval for 208 units on the site under 4/2320/14, as these remain relevant. We do not wish to comment further on matters of principle (height, use, scale, etc.) as these have already been established through this proposal.

For information, policy is evolving in the Two Waters area. In November 2015, Cabinet adopted the Two Waters Strategic Framework, as a material planning consideration in the determination of planning applications and as a guide for future strategic planning in the area:

<https://democracy.dacorum.gov.uk/ieListDocuments.aspx?CId=157&MId=252>

This is a high level document which has been prepared to provide immediate planning and design guidance for the area and to also inform future strategic planning in the area and a more detailed master plan for Two Waters, should this be commissioned at a later stage. It covers:

- uses and activities;
- access and movement;
- streets and spaces; and
- form and detail.

While it sets out some useful high level principles, it is recognised that key components of the proposal have already been accepted in approving the earlier scheme. Furthermore, two briefs are to be commissioned to consider transport related issues in more detail connected with the Framework.

The main concern stems from the impact of the additional 64 flats on the locality, particularly traffic movements. The scheme will lead to an extremely high density of development at over 1200 dph. We also need to ensure that the development provides an adequate level of amenities for the new residents (Policy CS12) e.g. parking, amenity space, etc. We note the continued commitment to provide on-site community related facilities (A3/D1/D2 space).

We support the principle of providing a mix of housing (1, 2 and 3 bed apartments) on the site (Policy CS18) and that this would also contribute to affordable housing

(Policy CS19). The latter should be provided as on-site provision at 35% of the total units i.e. 95 units. However, we note that only 52 units (18%) are currently to be provided which is below standard. The applicant will need to justify this position through a viability assessment and the views of the Strategic Housing should be sought on this matter.

We welcome the scheme's continued commitment to a high level of sustainability and in fulfilling requirements under Policy CS29 in terms of reducing the building's total energy use/carbon footprint. However, the achievement of all these measures, while laudable, does appear very ambitious.

The reconfiguration of the scheme to create the extra 64 units will lead to additional pressure on parking (Policy CS12b)), its access arrangement and on the local roads serving the site. The views of the Highway Authority should be sought on these points, especially given the critical location of the site close to the A41 spur road/London Road/Two Waters Road junctions and the new Aldi food store.

Parking is to be provided to standard (saved DBLP Appendix 5) at just over a 1:1 basis through a basement automatic parking system (APS). While the former is welcomed, we are unsure as to how exactly the APS would work in practice and how this might affect access into the site, particularly the need for any queuing on the London Road (Policy CS12a)). We are pleased to see the applicant's commitment to an overall green approach to travel in respect of providing a travel plan, the availability of electric cars and bikes, the formation of a car share club and the provision of 264 cycle spaces. The site is ideally located to access the Hemel Hempstead train station (and associated bus service), but would only really benefit residents who commute by train.

Additional Comments;

You have asked Strategic Planning for comments on the loss of offices in the present revised scheme compared to the position in the approved proposals under 4/3441/15. The floorspace in the latter was c.800 sqm of offices.

Policy preference would be to maintain some scope for employment through the development:

- given its location within the GEA (Policies 31 and Pre-Submission Site Allocations DPD PolicySA5) and for job retention/employment opportunities (Policies CS14 and 15);
- to part reflect the existing office use on the site;
- to provide an active frontage at ground floor; and
- to ensure a genuinely mixed use and sustainable form of development.

However, it is clear that current and emerging national policies, amongst a number of approaches, seeks to boost housing supply per se, to promote the use of employment/commercial land for housing wherever possible, and to encourage opportunities for the redevelopment of brownfield land. The prior approval process already sanctions the loss of the existing office floorspace (albeit through conversion) under 4/1044/14/OPA. The Government is also committed to extending these rights to allow for the demolition of office buildings and new building for residential use avoiding the need for separate applications for planning permission for the works necessary to redevelop office sites (<https://www.gov.uk/government/news/thousands-more-homes-to-be-developed-in-planning-shake-up>). This will be taken forward through the Housing and Planning Bill 2015. While the Bill has not yet been enacted, it would likely make our position difficult to defend at appeal if we did want to take a harder stance on the omission of the office element from the revised scheme.

Given the above, we would not wish to object to the omission of the office floorspace in the revised proposal.

15. Herts County Council Property Services

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

Based on the information provided to date we would seek the provision of fire hydrant(s), as set out within HCC's Planning Obligations Toolkit.

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

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

The requirements for fire hydrant provision are set out with the Toolkit at paragraph 12.33 and 12.34 (page 22). In practice, the need for hydrants is determined at the time the water services

for the development are planned in detail and the layout of the development is known, which is usually after planning permission is granted. If, at the water scheme design stage, adequate hydrants are already available no extra hydrants will be needed.

Section 106 planning obligation clauses can be provided on request.

Justification

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

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

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

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

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

(ii) Directly related to the development;

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

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

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

A Section 106 legal agreement would be the County Council's preferred method of securing fire hydrants. However, it is recognised that Dacorum Borough Council is now required to scale back the use of such agreements. If a Section 106 agreement is not otherwise anticipated for this development we would seek the inclusion of a condition to the planning permission. We would propose wording as indicated below:

"Detailed proposals for the fire hydrants serving the development as incorporated into the provision of the mains water services for the development whether by means of existing water services or new mains or extension to or diversion of existing services or apparatus shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the development and in accordance with the approved details thereafter implemented prior to occupation of any building forming part of the development."

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

16. Hertfordshire Ecology

Thank you consulting Hertfordshire Ecology on this application. I apologise for the delay with this reply.

We previously provided comments in 2014 (LPA reference 4/02320/14/OUT) and our comments remain similar, but slightly updated.

We have no biological (species or habitats) records for the application site, which is almost entirely developed, apart from amenity grass borders and shrub planting around the edges.

There is the possibility of reptiles associated with the railway 100m to the south, although there are no records of these species present along the railway at this point. An adjacent development recently provided a reptile mitigation statement as a precaution although this site was closer to the railway and I do not consider there is sufficient justification for a similar approach here - there is considerable hardstanding areas between this site and the railway corridor. However the existing grassland should continue to be managed by regular cutting so as not to attract any such species if they are present in the area.

The 2014 ecological report by Arbtech Consulting found little or no ecological interest other than the potential for nesting birds within the scrub. I recommend the following **Informative** is added to any permission granted:

• 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.

17. Environmental Sustainability Officer

I read through the first half of the document relating to the sustainability credentials. In essence they are proposing:

- 4 x 1 km deep boreholes, approx. 18 inches wide for geothermal – ACHIEVABLE but extremely costly, will be a fantastic achievement if carried out
- Green roof - ACHIEVABLE
- Rain water harvesting for grey water - ACHIEVABLE
- Solar thermals - ACHIEVABLE
- Solar PV – ACHIEVABLE – no mention of a battery store for night requirements of electricity, like all flats underfloor heating/ lighting
- Underfloor heating for all areas of all flats – ACHIEVABLE (but costly to run unless the solar pv is installed for electricity generation)
- EPC A+ - ACHIEVABLE
- Triple Glazing with U Value less than 0.75 – ACHIEVABLE but expensive!

Nothing stated are world class technological, mechanical and engineering, or building fabric innovations, but they are expensive. A lot of what they are proposing is also being constructed into the new Forum Building.

Looking forward to hearing how the project progresses.