

**4/00759/16/MFA - PROPOSED REAR EXTENSION TO PROVIDE AN ADDITIONAL 21 BEDROOMS AND A NEW GP DOCTOR'S SURGERY.
32 HIGH STREET, KINGS LANGLEY, WD4 8AA.
APPLICANT: B&M Care.**

[Case Officer - Nigel Gibbs]

Summary

The application is recommended for approval.

The principle of new residential development is acceptable in accordance with Policy CS1 of Dacorum Core Strategy on this brownfield site. The loss of the existing dwellinghouse at no. 1 Langley Hill will be compensated by the resultant public benefit of the centrally located inclusive replacement community doctors surgery and the enlargement/ consolidation of the approved elderly persons care home providing new specialist housing.

Despite the development's scale it can be visually/ physically accommodated within the site's heritage setting/ context in a positive way. It takes advantage of the levels and is compatible with the street scene. The Revised Scheme raises no objections based upon residential amenity.

There are no highway safety/ access objections. The identified shortfall on site parking provision serving the surgery is not such an overriding material consideration to substantiate withholding the grant of planning permission. This takes into account that this is a quasi replacement surgery with significant public/ social infrastructure benefits, its very sustainable location, the availability of nearby public parking and that the fully inclusive surgery serving the same area will be provided with more parking than the existing and with full and safe access for persons with disabilities and limited mobility.

The outstanding drainage objection from the Lead Flood Authority has now been addressed.

Site Description

No. 32 is the site of the former now demolished Post Office Delivery Depot/ Centre subject to planning permission for a 36 bed care home.

No. 32 is located to the immediate north of the High Street- Langley Hill junction. It is a prominent location in the centre of the Kings Langley Village within the Conservation Area. Its elongated frontage is distinguished by preserved trees. The Red House, a Grade 2* listed building, is to the immediate north. The site frontage currently features building construction hoardings adjoining a main village bus stop.

No. 32's southern boundary adjoins the steeply rising Langley Hill. This boundary is defined by a high brick wall, adjoining grass verge and a preserved tree close to the former depot's site access onto Langley Hill. Views from the access into the site show very significant changes in levels across the site.

No. 1 Langley Hill is a detached gable chalet bungalow abutting the original western boundary of no. 32 which is defined by a high wall. No. 1 occupies a prominent position in Langley Hill visible from the 55 space public car park opposite.

Langley Hill Close is a private cul de sac of seven detached two storey dwellinghouses to the immediate west of no.1. Its access road adjoins the elongated boundary wall of no.1 Langley Hill which is located at a lower level.

No.1 Langley Hill Close is at the entrance to the cul de sac, set back from the Langley Hill- Langley Hill Close junction. This dwelling features an elongated open front garden which is used as a main amenity space by the current owners with a smaller enclosed rear garden. No. 7 Langley Close is located to the north of the original curtilage of no. 32. No. 5 Langley Hill is to the immediate west of no 1. Langley Hill Close occupying an elevated and much more forward position. All these dwellings lie beyond the Conservation Area.

The existing Haverfield GP Doctors' Surgery at no. 34 High Street abuts the High Street and Langley Hill junction. It occupies a listed building and is within the Conservation Area.

Proposal

The proposed demolition of No.1 Langley Hill and the amalgamation of its land with that at no. 32 is to enable the construction of a very substantial brick and handmade clay tiled gable and hipped roof tiled inverted 2.5 storey(with basement) 'L' shaped rear extension to the approved care home building and the provision of a new GP doctors surgery. The care home would provide 21 * new bedrooms in addition to the approved 36.

The development will be accommodated along the whole of the site's northern (adjoining Langley Hill Close) and western sides. It will feature a linking two storey component within the site's north west corner providing a communal glazed lounge room/ conservatory and associated garden, closest to no. 7 Langley Hill Close.

The development's central communal/ shared courtyard will be linked to the existing Langley Hill access. This will provide vehicular turning and access to the parking serving the surgery and the care home. There will be 4 parking spaces for the surgery with 15 for the care home.

The development's gable roof part will replace the existing dwelling at no. 1 Langley Hill, lying parallel to and close to the retained existing elongated boundary wall fronting Langley Hill Close. The building will also be set back from Langley Hill.

The care home extension in addition to its 21 bedrooms rooms will feature lounges/dining rooms, lifts, stairwells, the aforementioned conservatory, storeroom, training room, chapel and staff office. To maintain the security of the elderly residents the main entrance will be controlled by staff and all accesses will be fitted with alarms and CCTV cameras to maintain a high standard of security. Access to the side of the care home building and gardens will be gated, in the interests of resident safety and security.

The ground level GP doctors' surgery with access from a communal courtyard off Langley Hill will comprise of a reception/waiting room, patient wc's, an administration office, a store, a meeting room, nurses room and four doctor consulting rooms.

*Note: The Original Scheme featured 26 bedrooms for the Care Home. The submitted Revised Scheme eliminated second floor bedroom windows facing towards the garden of no. 1 Langley Hill Close reducing the bedrooms to 24. Following recent discussions the number of bedrooms is now 21 and subject to a recommended condition. The Revised Scheme also proposes a slightly modified parking layout providing 3 additional car parking spaces to the Original Scheme also involving the bin store's slight relocation.

The Proposed Facilities

The Supporting Statement confirms:

Care Home

B&M Care operate more than 20 care homes for the elderly in the Home Counties and are always striving to provide the very best living environment for their elderly residents. The proposed extension to accommodate the additional beds for the elderly would meet modern Care Quality Commission (CGC) 2010 Essential Standards of Quality and Safety standard for Older People, which assists providers to comply with section 20 regulations of the Health and Social Care Act 2008. The standards specify minimum size and spaces standards for bedrooms, corridors, escapes, communal spaces etc. right down to furniture and fittings. Dementia care will be available.

B & M Care is a responsible care home operator with more than 30 years of experience in developing and operating care homes for the elderly. B&M Care operate in the region of 1150 bed spaces in 22 care homes for which they have won a number of industry design awards for the design of their care homes.

The Supporting Statement confirms that:

- Most residents will be 80+ years.
- All residents will need assistance with mobility and daily life.
- Most residents suffer from a level of dementia to varying degrees.
- No residents will leave the site unassisted. They will live effectively in a self-contained gated community.
- All residents will due to their age and health be confined in the main to site, although occasionally a resident may be taken out for the day by a relative.
- The residents will not place additional demands on local facilities and services.

The need for a new GP Doctors Surgery

The supporting document confirms:

1. The Principals of Haverfield Surgery based at 34 High Street, Kings Langley approached B&M Care in early 2015 to enquire whether they could accommodate a new GP surgery within the B & M development.
2. Haverfield Surgery is a local GP practice with nearly 3,500 patients. There has been a 'doctors surgery' on this site going back to 1747. In 1968 Dr Doris Brown gave the

grounds at the rear of Haverfield to Dacorum Council as free car park for the benefit of Kings Langley in perpetuity. There are approximately 55 spaces available in this car park located directly opposite the application site.

3. The GP surgery operates out of a listed premises which is unfit for purpose by modern standards. A new premises would allow for fully disabled access and an opportunity for the surgery to expand their activities, expand its list and deliver other aspirations and ambitions for the local community.

4. A NHS England GP Premises Team Inspection Report 2015 deemed the current Haverfield Surgery premises not to be compliant with the Equality Act 2010 in most aspects. Particular mention was made of the main entrance, with steep sloping access and a substandard disabled access via a side entrance.

5. B&M Care would welcome the creation of a "Community Hub" offering GP care to Kings Langley community and residents of the home alike.

6. A brand new 21st Century GP surgery can offer fully disabled access, provide additional services, expand their patient list, employ an additional Partner GP, become a qualified GP Trainer and an accredited training practice helping to meet locally the NHS work force challenges, offer 'on the job' training and offering long term continuity of services for Kings Langley.

7. Furthermore, the Practice could offer additional services minor surgery services, maternity & family planning services and vaccine clinics. The surgery would be able to bring in hospital consultants to offer out-patient consultations and clinics for the local community.

8. The proposed Surgery in terms of floor area would appear similar or possibly smaller but with much more efficient use of space. This will allow the practice to add one additional GP in the future if the needs of the Kings Langley require it, without the need to relocate. This is as noted in the Operators joint statement submitted as part of the application.

Annex A is the Operators Statement. A Care Quality Commission Report by Professor Steve Field was published on 20 July 2016 following the surgery inspection in April 2016.

It has been recently clarified that Haverfield Surgery does not have a waiting list. There are 3342 patients registered at the surgery; 1939 are Kings Langley residents (58%) Other patients are from Abbots Langley, Chipperfield, Bovington, Hemel Hempstead and a few surrounding villages.

Haverfield Surgery employees 12 members of staff at no.34. There are 5 clinicians (3 GPs, 1 nurse, 1 health care assistant) and 7 administration staff. 1 GP is full time and 2GPs job share as a full time equivalent. All other employees are based upon various part time hours. There are also two evening based cleaners.

Background to the Application

The B&M Care Operators Statement confirms that there has been dialogue between B&M and Haverfield GP Practice Kings Langley since early 2015 to consider whether the site was capable of accommodating a new GP surgery. It has been confirmed that No.1 Langley Hill came on the market in later 2015 and opened up the possibility of meeting the needs of a new GP surgery for Kings Langley and some additional care home beds.

According to the submitted Design & Access Statement before submitting the application B&M Care and Haverfield GP Practice were in communication with Kings Langley Parish Council and 'Ward and District Councils in Dacorum Borough' outlining their intentions for this planning application. There was no pre application dialogue with officers.

Relevant Planning History

Planning Permission 4/01800/12MFA. Demolition of existing building and construction of 36 bedroom residential care home with parking, tree protection and gardens. The development has commenced.

4/01237/14/DRC Discharge of Pre Commencement Conditions 2, 7 (part), 9, 14, 19 and 20. Whilst there has not been discharge of pre commencement conditions 8 and 15 it is interpreted that due to their terms this does not nullify the permission which remains extant/ live.

Conservation Area Consent 4/01849/12/CAC Demolition of the former Post Office Building.

Temporary Planning Permission 4/01524/12 Temporary change of use from delivery office (B8) to fitness centre (D2): Ground floor only for 24 months.

Tree Preservation Order at the Site.

Referral to Committee

The application is referred to the Development Control Committee due to the contrary views of Kings Langley Parish Council following two consultations.

Constraints

Large Village
Local Centre
Conservation Area*
Adjoins Conservation Area*
Tree Preservation Order
Area of Archaeological Importance
Former Land Use
Parking Accessibility Zone
Community Infrastructure Zone 2
Air Direction Limit

*Note: No. 32 High Street is within the Conservation Area. No.1 Langley Hill is outside the Conservation Area.

Policies

National Policy Guidance
National Planning Policy Framework (NPPF)
National Planning Guidance Notes

Dacorum Adopted Core Strategy

NP1 - Supporting Development
CS1 - Distribution of Development
CS4 - The Towns and Large Villages
CS8 - Sustainable Transport
CS9 - Management of Roads
CS10 - Quality of Settlement Design
CS11 - Quality of Neighbourhood Design
CS12 - Quality of Site Design
CS13 - Quality of Public Realm
CS14 - Economic Development
CS16 - Shops and Commerce
CS17 - New Housing
CS23 - Social Infrastructure
CS25 - Landscape Character
CS26 - Green Infrastructure
CS27 - Quality of the Historic Environment
CS29 - Sustainable Design and Construction
CS31 - Water Management
CS32 - Air, Water and Soil Quality
CS35 - Infrastructure and Developer Contributions

Saved Policies of the Dacorum Borough Local Plan

Policies 51, 54, 57, 58, 63, 96, 100, 101, 113, 119 and 120
Appendices 1, 2, 3, 4, 5 and 8

Supplementary Planning Guidance / Documents

Environmental Guidelines (May 2004)
Water Conservation & Sustainable Drainage (June 2005)
Energy Efficiency & Conservation (June 2006)
Accessibility Zones for the Application of car Parking Standards (July 2002)
Landscape Character Assessment (May 2004)
Planning Obligations (April 2011)

Advice Notes and Appraisals

Sustainable Development Advice Note (March 2011)

Representations

MP Mike Penning

The MP has written to Dacorum Borough Chief Executive requesting an update appraisal of the application. This letter was set against the existing planning permission for the care home and that there is real concern in Kings Langley, particularly over the massive increase in parking, and also that such increased size development would be a burden on the community.

Kings Langley Parish Council

1st Scheme

Objects for the following reasons:

1. A number of windows would be overlooking existing residential homes, affecting the privacy of the residents.
2. It would result in an over-cramped development of the site.
3. There is insufficient parking. The Council is particularly concerned that the staff working in the new care home would take up a very high proportion of the parking spaces in the car park opposite the development which would seriously impact on its use by local people and visitors to shops and businesses, and, therefore, a detrimental effect on those shops and businesses.
4. It will have a detrimental impact on the character of the village.

Revised Scheme

Maintains its objection for the following reasons:

1. There are still a number of windows that would be overlooking existing residential homes, affecting the privacy of the residents.
2. It would result in a large, over-cramped development of the site.
3. There is insufficient parking. The Council is particularly concerned that the staff working in the new care home would take up a very high proportion of the parking spaces in the car park opposite the development which would seriously impact on its use by local people and visitors to shops and businesses, and, therefore, a detrimental effect on those shops and businesses, and the village as a whole.
4. There are potential traffic / access issues.
5. It will have a detrimental impact on the character of the village.

Strategic Planning

Original Scheme

The proposal involves the demolition of 1 Langley Hill and the creation of an extension to the permitted care home (application no. 4/01800/12/MFA located on the previous post office site). This existing permission (currently being implemented) provides a 36 bedroom residential care home which would be in addition to the current proposal for an extra 26 bedrooms. This could result in a 62 bed care home. It is noted that the applicant states that there is demand for care home spaces for the elderly in Dacorum Borough and Hertfordshire given the ageing population. As a result of the existing permission, this use type and general scale of scheme is in principle established. While geared to residential areas Policy 71: Community care of the Dacorum Borough Local

Plan 1991 – 2011 states that:

“development of community care facilities for the handicapped and elderly will be encouraged in residential areas provided: (a) schemes incorporate adequate space for necessary ancillary services, amenity and visitor car parking; and (b) there is no over-concentration of community care facilities.”

Point b) is a matter of consideration for the case officer.

It is acknowledged that the proposal includes the relocation of the Haverfield Surgery which is a local GP practice with an established patient list. This surgery is currently located on the corner of High Street and Langley Hill, on the south side and operates out of listed premises which have been deemed ‘unfit for purpose’ by modern standards (in terms of DDA requirements). The applicant states that this proposal provides an opportunity for the surgery to expand their activities, expand its list and deliver other aspirations and ambitions for the local community. The applicant states that the mixed use for a doctor’s surgery and a residential care home could be seen as a creation of a “Community Hub”.

Given the above points, Strategic Planning and Regeneration welcome the principle of the new surgery and the logic of this forming part of a mixed use community development. Core Strategy Policy CS23: Social Infrastructure supports development which is located to aid accessibility and is designed to allow for different activities. It states that the dual use of new facilities will be encouraged and existing social infrastructure will be protected unless appropriate alternative provision is made. This scheme provides multi-functional spaces and the building has been designed to house multi-uses. Core Strategy Policy CS4: The towns and large villages also supports residential and community uses in local centres provided that it is compatible with its surroundings.

i) Impact upon conservation area

1 Langley Hill is not within the conservation area, although the existing care home is located within the Kings Langley Conservation Area, so the extension to the care home will generally be located within the conservation area.

Saved Policy 120: Development in conservation areas of the Dacorum Borough Local Plan 1991 – 2011 states that “new developments or alterations or extensions to existing buildings in the conservation areas will be permitted provided they are carried out in a manner which preserves or enhances the established character or appearance of the area. Development proposals outside a conservation area which affect its character and setting will be considered likewise.” It is acknowledged that the design, proportions, materials and detailing have been selected to mirror the approved care home design. The two care home proposals cumulatively is likely to impact upon the established building lines, layouts and patterns as well as scale and proportion within the area.

SPR would expect the proposal to ensure quality of design given its prominent position

and frontage on to the street. SPR would also expect that views on this have been sought from the Design and Conservation Team regarding whether the proposal would adversely affect the established character of the area.

ii) Design

Saved Policy 10: Optimising the use of urban land of the Dacorum Borough Local Plan 1991 – 2011 supports proposals for new development designed to achieve the maximum density compatible with the character of the area, surrounding land uses and other environmental policies. Saved Policy 21: Density of residential development of the Dacorum Borough Local Plan 1991 – 2011 states that careful consideration will be given to the density of all new housing proposals to ensure that they make the most efficient use of the land available. Core Strategy Policy CS1: Distribution of development states that “the market towns and large villages will accommodate new development for housing, employment and other uses, provided that it a) is of a scale commensurate with the size of the settlement and the range of local services and facilities; b) helps maintain the vitality and viability of the settlement and the surrounding countryside and c) causes no damage to the existing character of the settlement or its adjoining countryside.” The applicant states that the proposal will assist with meeting an identified need for residential care in the area, will provide for the re-provision of the doctors surgery proximate to the community, is of an in-keeping scale and is not damaging to the existing character of the settlement.

Saved Policy 111: Height of buildings of the Dacorum Borough Local Plan 1991 – 2011 (DBLP) states that “within the towns and large villages, buildings up to three storeys will be permitted provided they harmonise with the character surrounding area.” It is acknowledged within the DBLP that pressure for new buildings is likely to fall within Kings Langley, but to maintain the character of the settlement and its relationship with the countryside building heights should be limited. It is acknowledged that this proposal is of a similar scale and height to the permitted care home building.

Core Strategy Policy CS12: Quality of Site Design requires the provision of sufficient parking and sufficient space of servicing, to respect adjoining properties in terms of scale, height, bulk and materials and integration with the streetscape character. It is acknowledged that the proposal will utilise the same materials as those approved for the permitted 36 bedroom care home.

Design is an important matter due to the schemes prominence on the street scene and corner plot. The impact of the blocks scale and bulk of development should be considered against the immediate character of the area and alongside the matters highlighted from the relevant policies above. The quality of the design and materials are of considerable importance to ensure that the proposal is sympathetic to its surroundings and location within the conservation area. Can the proposal be conditioned to ensure the detailed material choices do not adversely impact the area?

iii) Area of archaeological significance

The proposal is located in an area of archaeological significance saved DBLP Policy

118 and Core Strategy Policy CS27) SPR would expect the County Archaeologist to provide detailed comments about any impacts resulting from this proposal.

iv) Sustainable transport

Parking should be provided in accordance with saved DBLP Appendix 5. SPR note its proximity to public parking. The views of the Local Highway Authority should be sought.

It is acknowledged that the proposal is partly located within the defined town centre/local centre boundary. The applicant states that it is not meeting the parking standards as it is 3 spaces lower than the Council's current adopted standards. The applicant states that there is a car park directly across Langley Hill from the site (with 55 spaces and no charges). What capacity does this have? The applicant states that the Haverfield Surgery has no dedicated parking spaces, so the provision of 3 spaces could be viewed as betterment on the current arrangements.

Core Strategy Policy CS8: Sustainable Transport states that "all new development will contribute to provide sufficient, safe and convenient parking based on car parking standards: the application of those standards will take account of the accessibility of the location, promoting economic development and regeneration, supporting shopping areas, safeguarding residential amenity and ensuring highway safety." The applicant states that the site is located in a sustainable position in respect to public transport needs, nearby shops, employment and other services within a reasonable distance. The applicant also states that there will be suitable arrangements made for a covered and secure cycle parking facility (6 spaces provided), which is supported by saved DBP Policy 62: Cyclists of the Dacorum Borough Local Plan 1991 – 2011. Saved DBLP Policy 57: Provision and management of parking of the Dacorum Borough Local Plan 1991 – 2011 states that "the minimum level of car parking provision will be sought in developments by adopting maximum demand-based standards of provision. Provision will be reduced below this level in locations accessible by other travel modes or which can be made more accessible through planned improvements or as part of the development." While the provision on site is under that required by policy, we are not overly concerned due to the proximity of the site to the existing public car park (subject to available capacity). Although more detailed views on transport matters should be obtained from the highways team.

(vi) Loss of housing

The proposal will result in the loss of a dwelling. Saved DBLP Policy 15 and Core Strategy Policy CS17: New Housing both seek the retention of housing land. Policy 15 does allow some flexibility where essential small-scale essential facilities would be provided and alternative properties are not available. SP is happy to support such a flexible approach to the loss on the basis that the proposal will provide for a new and improved doctors surgery to meet the needs of the village. SP would also acknowledge that it would have proved difficult to find an alternative and suitable non-residential site as opportunities are likely to prove very limited in the village. However, it would be

helpful for the applicant to confirm this position.

Conclusion

In principle, we welcome the proposal as it can contribute towards meeting the health and community needs of Kings Langley. Therefore, SP do not have any fundamental objections to the proposed development as there is already a precedence created from the existing permission, subject to:

- the detailed consideration of the matters related to cumulative impacts of the two schemes:
- impacts on the conservation area through design of the building; and consideration of specialised comments from archaeology, highways and conservation teams.

Conservation & Design

(Notes by the Case Officer agreed by the Conservation Team Members)

Initial Response/ Informal Advice : Verbal Overview by the Former Conservation Officer to the Case Officer

1. Boundary Wall to Langley Hill Close. The wall is a heritage asset and should be retained. The Conservation Area is under review and it could be extended to include the wall.
2. Concern regarding the overall scale/ massing of the conjoined development encompassing a large single unbroken mass of building.
3. Junction of the approved and proposed new buildings. Lacks cohesion- poor linkage-missed opportunity to create a visual break.
4. Insufficient Information. Lack of cross section and no front elevations (ie old and new)/ roadway layout.

Meeting between the Former Conservation Officer, new Lead Conservation Officer and Case Officer

(Note: This was following a site visit by the new Lead Conservation Officer at the request of the Former Conservation Officer)

1. Notwithstanding the above Initial Response there were no fundamental Conservation Team objections to the scale of the development- overall the scheme is acceptable.
2. Boundary Wall to Langley Hill Close. This must be retained.
3. There should be full height wall along the Langley Hill frontage in front of no. 1 Langley Hill. This should replicate/ echo the existing frontage wall. Railings are acceptable.
4. Within this wall there should be the installation of a pedestrian gate/ access and a double gate is recommended creating an active frontage.

5. Conflict between the pedestrian and vehicular access from Langley Hill due to levels. Need for clarification of levels to ensure safe pedestrian access.

6. The introduction of a chimney to the gabled frontage elevation could benefit the design.

Building Control

Comments awaited.

Trees & Woodlands

There are no trees or significant landscape features on this site.

(Note : Parish Council consultation with T &W: PC concerned that the boundary fencing is causing damage to a silver birch tree by rubbing against it. T & W was not able to carry out a full inspection because the site is locked. The owners have been requested to provide access for a full inspection of all the TPO trees on this site).

Scientific Officer

The application relates to the demolition of 1 Langley Hill and the construction of an extension to the residential care home (originally approved under planning permission 4/01800/12/MFA), with Doctor's Surgery and areas of hard and soft landscaping.

Condition 14 of planning permission 4/01800/12/MFA relates to contamination. The following reports have been submitted and approved under 4/01237/14/DRC to facilitate the discharge of this condition:

- Preliminary Investigation Report; Contract: 52200; Ian Farmer Associates (1998) Limited; March 2014
- Report on Phase 2 Ground Investigation; Contract 52200A; Ian Farmer Associates (1998) Limited; May 2014
- Gas Monitoring Letter Report; Reference: VT/vt/52200A/7927; Ian Farmer Associates (1998) Limited; 9 June 2014
- Remediation Statement; Ref: WGG/gg/52200A/8018; Ian Farmer Associates; 9 September 2014

The intrusive investigation identified elevated concentrations of Lead and Benzo(a)pyrene in Made Ground on-site. It was recommended that the Made Ground be removed from areas of proposed soft landscaping and a 600mm thickness of clean cover provided. The intrusive investigation also noted a hydrocarbon odour in WS6 between 0.40 and 0.80mbgl. It is considered possible that this may be associated with a previously unidentified former underground fuel storage tank or associated infrastructure. Although the corresponding soil sample taken from this depth did not identify any exceedances of the adopted generic assessment criteria in respect of individual TPH carbon fractions, it was recommended that the developer be advised to keep a watching brief during future ground works on the site (particularly within the vicinity of WS6) for any potentially contaminated material or structures. The last correspondence (memo to planning dated 20 October 2014 following submission of the Remediation Statement) indicated that the information submitted to date was

sufficient to allow discharge of sections (a) Site Characteristic and (b) Submission of Remediation Scheme of condition 14.

In respect of the current application, the SO would ask that the proposed remedial works be extended to incorporate this area also; to comprise removal of the Made Ground and incorporation of a 600mm cover system in soft landscaped areas. WS6 is situated close to the current application boundary, so the requirement for a careful watching brief for further visual or olfactory evidence of hydrocarbon impacted soils and subsurface structures is also valid.

To ensure the above remedial works are undertaken, it is recommended that the following contamination condition be attached should planning permission be granted:

All remediation or protection measures identified in the Remediation Statement approved under planning permission 4/01237/14/DRC, (which relates to the discharge of condition 14 of 4/01800/12/MFA), shall be fully implemented within the timescales and by the deadlines as set out in the Remediation Statement and a Site Completion Report shall be submitted to and approved in writing by the local planning authority prior to the first occupation of any part of the development hereby permitted.

For the purposes of this condition a Site Completion Report shall record all the investigation and remedial or protection actions carried out. It shall detail all conclusions and actions taken at each stage of the works including validation work. It shall contain quality assurance and validation results providing evidence that the site has been remediated to a standard suitable for the approved use.

(Reason: To ensure that the issue of contamination is adequately addressed and to ensure a satisfactory development).

Noise & Pollution

Comments awaited.

Food, Health & Safety

The Food and Health & Safety Team was not consulted on the Original Scheme .No objection to the proposed extension. The recommendations relate to the kitchen in the in the original planning application.

Refuse Controller

Comments awaited.

Hertfordshire Ecology

Initial Advice

1. HE have no ecological records from this site, although there is a bat record from a relatively urban area of Kings Langley, at Vicarage Lane. However the urban location

of the application site just off the High Street does not suggest bats are particularly likely to be regularly using this area although the local environment is relatively well treed.

2. The bat survey found no evidence of bats following an inspection of the loft space of the house to be demolished, but did identify a number of features which bats could potentially use – a missing tile, lifted tiles and a small number of gaps in mortice between bricks. On this basis the building has been assessed as having a moderate potential for bats. HE acknowledge these are features which could potentially be used by crevice dwelling bats, although in the circumstances HE would have considered the potential for bats to be no more than low.

3. However, as access could not be gained to these areas to check them further, and given that a moderate potential has been identified, following Bat Conservation Trust Guidance this will now require at least two roost presence / absence surveys to confirm whether or not bats are present, as outlined in the report. HE have not been to the site and HE is not a licensed to undertake bat surveys, so HE is not in a position to dispute this assessment or recommendation.

4. In any event, given that further surveys are required, the LPA is not in a position to determine the application as:

- Moderate Bat potential has been identified;
- The site has not been subject presence / absence activity surveys and so bat presence has not been fully assessed;
- If bats are present, there are no recommendations for suitable compensation.
- If a licence is needed, HE is not in a position to advise that a licence is likely to be obtained, consistent with the NE Standing Advice.

5. On this basis the LPA has insufficient information on which to determine the application.

6. Consequently, given that this now the survey season, the recommended activity surveys should be undertaken and recommendations provided accordingly.

7. Once this has been undertaken and the report updated as necessary, the LPA should then be in a position to determine the application in respect of protected species and its Biodiversity Duty.

Additional Response

In respect of HE's recent comments on the above, it has been noticed that Herts Ecology have already commented on this application (26/4/16).

In any event, it seems that DBC will have sufficient information to determine the application given that the bat report does include a Worst Case Scenario compensation recommendation, which HE missed for some reason.

However, given that this is now the survey season, and that further surveys are, by default, required, HE strongly advise that these surveys are undertaken sooner rather than later as this should clarify with sufficient / reasonable certainty whether or not bats

are using the building. This will enable advice to be provided accordingly.

If this can be undertaken prior to determination this would follow best practice and enable DBC to determine the application with the benefit of full information. If not, the LPA can still determine the proposals but should require the further surveys by Condition to ensure they will be undertaken.

Revised Scheme

1. HE cannot see any reason why the revised plans (uploaded on DBC website 6/16/2016) would have any ecological impact not previously raised.

2. HE would take this opportunity to remind the LPA that the bat survey season is now well advanced and further surveys will be required to further inform any works or to demonstrate there are no bats present at this site. If a licence will be required from Natural England, this would normally need to be based upon information from the previous field season and not any older, so this may also need to be considered as necessary. The building potential is considered moderate requiring three additional surveys. Whilst HE acknowledge there is possible access for bats, HE would consider the potential to be much less than this HE is in not in a position to advise otherwise. Consequently these surveys should be undertaken either prior to approval or as a Condition of approval and appropriate advice provided / action taken accordingly.

Additional Bat Surveys

Satisfied that further surveys are not necessary as there seems to be no roost present after two surveys.

Hertfordshire County Council: Historic Environment

The development footprint formed part of the gardens of a large town house shown on the 1835 parish tithe map, which was replaced in the mid 19th century by a villa (shown on the 1st edition Ordnance Survey map of 1873-1881, which was itself demolished in the mid 20th century. In addition, Historic Environment have now been sent the report on an archaeological evaluation which was carried out in July 2015, at the Kings Langley Delivery Office (prior to the construction of the care home). The results of archaeological investigations suggest the construction of the delivery office truncated original ground levels in the area.

In this instance, Historic Environment consider it is unlikely the proposal will have an impact on heritage assets of archaeological interest and therefore have no further comment to make on the application.

Hertfordshire County Council: Highways

Recommendation

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:

1 The construction of the development shall not commence until details of construction vehicle movements and traffic management measures are submitted to and approved by the local planning authority. Reason: To ensure the impact of construction vehicles on the local road network is minimised.

2 Before commencement of site works, the method of washing of vehicle wheels exiting the site shall be agreed in writing with the Planning Authority and the agreed method shall be operated at all times during the period of site works. Reason: In the interest of highway safety and amenity.

3 .Prior to the first occupation of the development the applicant shall update the Travel Plan associated with the main care home to encourage the use of alternative modes of transport to the development. This Plan will be prepared and updated in accordance with HCC document 'Hertfordshire's Travel Plan Guidance for Business and Residential Development available at <http://www.hertsdirect.org/services/transtreets/highways/highwaysinfo/hiservicesforbus/devmanagment/greentravelplans1/>. Reason: To promote sustainable transport measures for residents, visitors and staff at the new development.

4 All areas for parking, storage and delivery of materials associated with construction of the development shall be provided within the site on land, which is not public highway, and the use of such areas must not interfere with the use of the public highway. Reason: In the interest of highway safety.

The Highway Authority recommends inclusion of the following Advisory Notes (AN) to ensure that any works within the highway are carried out in accordance with the provisions of the Highway Act 1980.

AN1) Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence. Further information is available via the website <http://www.hertsdirect.org/services/transtreets/highways/> or by telephoning 0300 1234047.

AN2) It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to willfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence. Further information is available via the website <http://www.hertsdirect.org/services/transtreets/highways/> or by telephoning 0300 1234047.

The views of the Highway Authority have been sought by Dacorum Borough Council on application for permission for construction of a two-storey side extension and provision of fence to front boundary.

The views of the Highway Authority have been sought by Dacorum Borough Council on application for permission for construction of a rear extension to provide an additional 26 bedrooms and a new GP doctor's surgery.

From the highways and transport perspective, the application was supported by a

completed application form, a site location plan, a proposed site layout plan, an Operator's Statement and a Design & Access Statement.

Proposal

The site of the former Post Office sorting office is currently a construction site for the erection of an approved 36-bed care home for the elderly. This development had DBC reference 4/01800/12/MFA. Permission is now being sought to extend the home on to the site immediately to the west of it at number 1 Langley Hill.

Site and surrounding road network

The address given for the site on the application form is 32 High Street, Kings Langley but this is the address of the main care home. The current application is seeking permission to build on the site of the bungalow at 1 Langley Hill. Langley Hill is a Local Access Road in the HCC hierarchy of roads. Langley Hill Close is a short (70m) cul-de-sac running along the western boundary of the site. It is a private road not maintained by the highway authority.

Road safety Investigation of records held by HCC for the last 5 years show that there have been no collisions resulting in casualties on Langley Hill. Two collisions resulting in slight injuries are recorded at the junction with the A4251 High Street and a third 50m to the south and a fourth 75 to the north.

Access to the site

The responses to question 6 in the application form indicate that there would be no changes to vehicular or pedestrian access points nor to existing highway and rights of way. The access would be shared with the main building which was itself the access to the previous Post Office building. It was established in the analysis by the Highway Authority of the previous planning application that adequate visibility is available from the site access.

Parking

(i). There are double yellow lines on both sides of Langley Hill as far as Langley Hill Close. From that point they extend on the north side only to keep the junction clear. From thereon parking is unrestricted but there are residential crossovers on both sides which create gaps in any parking that takes place. There is a 55 space car park located directly across Langley Hill from the care home. No charge is made for its use.

(ii). The response to application form question 10 indicates that there are currently 2 car parking spaces on site and that this would be increased by 5 to 7 spaces. There would be 6 new cycle parking spaces.

(iii). Proposed site layout drawing (number 25) also shows 7 new open air spaces with 2 of them being marked for disabled use. Proposed ground floor plan drawing (number 17) shows an additional 4 spaces at ground floor level next to the GP surgery entrance. These are what are referred to in DAS paragraph 4.3 as 'undercroft parking spaces will be (sic) provided within the courtyard allowing for 4 additional vehicles spaces accessed from Langley Hill'.

(iv). Dacorum Borough Council as a local planning authority will determine the level of parking they require for the development proposal.

Servicing Computer-generated swept path plots are provided which indicate that the internal court yard area could be used to allow an HGV to make a three-point turn allowing it to enter and leave the site in forward gear.

Assessment

The applicant did not provide traffic flow data or any kind of assessment of the impact of the traffic associated with the development on the adjoining highway network. However it was recognised by the Highway Authority in assessing the previous application at the main site that the change of use from B8 use to C2 care home is likely to generate fewer trips in the peak. In addition numbers of trips from the elderly care unit during peak hours are likely to be relatively low. The applicant has indicated that staff will be working on shift patterns and that many will walk to work from the local area. This would not cause significant increases at peak times. Visitor traffic to and from the site is likely to be generated outside the general peak hours.

Conclusion

HCC Highways has reviewed the information submitted and is satisfied that the proposed development would not create a significant negative impact on the free and safe flow of traffic on the adjacent public highway subject to the imposition of recommended conditions.

Note: There are no additional comments to the Revised Scheme.

Hertfordshire County Council: Lead Flood Authority

- Initial Response

In the absence of a surface water drainage assessment, LFA object to this application and recommend refusal of planning permission until a satisfactory surface water drainage assessment has been submitted. This should as a minimum include the following;

- Statement of compliance with the NPPF and NPPG policies, LPA local plan policies and HCC SuDS Guidance and Policies.
- Anecdotal information on existing flood risk with reference to most up to date data and information
- The location/extent of any existing and potential flood risk from all sources including existing overland flow routes, groundwater, flooding from ordinary watercourses referring to the national EA fluvial (River) and surface water flood maps.
- Where infiltration is proposed, evidence of ground conditions/ underlying geology and permeability including BRE Digest 365 compliant infiltration tests should be provided.
- A drainage strategy which includes a commitment to providing appropriate SuDS in line with the non-statutory national standards, industry best practice and HCC Guidance for SuDS.

- Detailed calculations of existing/proposed surface water storage volumes and flows with Initial post development calculations/ modelling in relation to surface water are to be carried out for all rainfall events up to and including the 1 in 100 year including an allowance for climate change.
- Evidence that if the applicant is proposing to discharge to the local sewer network, they have confirmation from the relevant water company that they have the capacity to take the proposed volumes and run-off rates.

Reason

A drainage assessment is required under the NPPF for all Major Planning Applications as amended within the NPPG from the 6 April 2015.

A surface water drainage assessment is vital if the local planning authority is to make informed planning decisions. In the absence of a surface water drainage assessment, the flood risks resulting from the proposed development are unknown. The absence of a surface water drainage assessment is therefore sufficient reason in itself for a refusal of planning permission.

Overcoming the objection

LFA note from the application form that it is proposed to discharge into soakaways and the site survey reference Drawing 26 indicates existing soakaways. LFA acknowledge that the proposed development is an extension to the previous application which has been approved and condition on drainage based on soakaways has been discharged. However without infiltration tests and surface water calculation, LFA cannot advise the feasibility of proposed drainage strategy.

LFA would expect as a minimum the geology to be confirmed with permeability tests to establish at the outset the feasibility of the proposed drainage strategy. Tests should be conducted to BRE Digest 365 Standards and record the levels of ground water. If infiltration is not feasible then an alternate scheme based on attenuation should be provided.

LFA require the overall run-off rate and the required storage volume to ensure that the proposed drainage strategy can attenuate for all rainfall events up to and including the 1 in 100 year plus climate change event. (Note ;climate change allowances have been updated and we now require all SuDS component to cater for all rainfall events up to and including the 1 in 100 plus 40% for climate change event. This applies to all planning applications validated on or after 19/02/2016).

Informative to the LPA

The applicant can overcome the objection by undertaking a surface water drainage assessment which demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall and gives priority to the use of sustainable drainage methods, the SuDS hierarchy and management train. If this cannot be achieved the LFA will consider whether there is a need to maintain our objection to the application. Production of a surface water drainage assessment will not in itself result in the removal of an objection.

For further advice on what LFA expect to be contained within the surface water drainage assessment, this is referred to by the Developers Guide and Checklist on HCC 's surface water drainage webpage.

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

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

- Response to Additional Information

Following a review of the surface water drainage assessment carried out by Hydrock reference R/C161599/002.02 dated August 2016, the Lead Local Flood Authority can now remove its objection on flood risk grounds.

The proposed drainage strategy is based upon infiltration and infiltration tests have been carried out to ensure the feasibility of the proposed scheme. It is noted that 40% for climate change allowance has been applied to the drainage strategy which includes the use of permeable paving, rainwater harvesting tanks and soakaways.

Therefore the LFA recommend the following conditions to the LPA should planning permission be granted.

Condition 1

The development permitted by this planning permission shall be carried out in accordance with the approved surface water drainage assessment carried out by Hydrock reference R/C161599/002.02 dated August 2016, and the following mitigation measures detailed within the FRA:

1. Providing attenuation to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + climate change event.
2. Undertake the drainage to include permeable paving, attenuation tank and soakaway as indicated on drawing 'Proposed Layout Plan' drawing reference Dwg 35.
3. Implement appropriate drainage strategy based on infiltration.

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority. Reasons: To prevent flooding by ensuring the satisfactory disposal and storage of surface water from the site and 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 the approved Drainage strategy and 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 1 in 100 year + 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.

1. Detailed engineered drawings of the proposed SuDS features including their size, volume, depth and any inlet and outlet features including any connecting pipe runs.
2. Final detailed management plan to include arrangements for adoption and any other arrangements to secure the operation of the scheme throughout its lifetime.
1. Detailed surface water run-off and volume calculations to ensure that the site has the capacity to accommodate all rainfall events up to 1:100 year plus climate change.
2. Any areas of informal flooding should the system flood above the 1 in 30 year event.

Reason: To prevent the increased risk of flooding, both on and off site

Recommended Informative to the LPA

For further guidance on HCC's policies on SuDS, HCC Developers Guide and Checklist and links to national policy and industry best practice guidance it is recommended there is reference to the LFA'S surface water drainage webpage: <http://www.hertfordshire.gov.uk/services/envplan/water/floods/surfacewaterdrainage/>

Hertfordshire Fire & Rescue Service

HFRS has examined the drawings and note that the access for fire appliances and provision of water supplies appears to be adequate.

Further comments will be made when HFRS receive details of the Building Regulations application.

Hertfordshire Constabulary: Crime Prevention

Dementia residents: This is mentioned at 8.7 in the Design and Access Statement . The building as well as the private amenity garden area for residents must be secure with suitable access control so that residents do not go missing and affect police resources.

Doctors Surgery: The surgery will need suitable security and a monitored alarm fitting. HC would expect to see this part of the building to be built to the Secured by Design physical security standards.

Cycle and Bin stores: These should be secure and cycle storage should also have a

cover over it to protect cycles from the weather and to encourage their use.

Otherwise on the basis of the submitted information HC have no comment.

Historic England

With this application approval is sought to extend the permitted care home being built at 32, High Street to provide twenty six additional bedrooms and a surgery.

Kings Langley's High Street is an attractive street of historic character. Although the character of the street is varied, red brick houses of the 18th and 19th century make a particular contribution. The High Street is designated as a conservation area.

Approval has already been given for the construction of a substantial care home at number 32, in place of the former post office. The chief effect of the proposed development will follow from the scheme already approved, and no comment on this is necessary here. The enlarged scheme would involve the demolition of a twentieth century house outside the conservation area and additional building to the rear of the site.

The National Planning Policy Framework provides policies for the conservation of the historic environment. Any harm to the significance of designated heritage assets (such as conservation areas), if supported by clear and convincing justification, should be weighed against the public benefits which would be procured (NPPF, 132, 134).

Historic England consider that the effect of the proposed additional development on the character and significance of the conservation area would either be neutral or would be to cause a modest degree of harm. The demolition of the house would not affect the character of the conservation area. The additional development would be partly within the conservation area. Although the intensification of the development might be thought at odds with the area's character, the design and choice of materials for the scheme are intended to respond that character. Any harm would seem likely to be limited.

Recommendation

HE recommend that in determining this application your Council weigh any harm to the character of the conservation area caused by the proposed development against the public benefits which the scheme would procure, in accordance with the Framework (NPPF, 132, 134).

Thames Water

Waste: Sewerage infrastructure capacity.

No objection.

Legal changes under The Water Industry (Scheme for the Adoption of private sewers) Regulations 2011 mean that the sections of pipes the developer share with neighbours, or are situated outside of the property boundary which connect to a public sewer are likely to have transferred to Thames Water's ownership. Should the

proposed building work fall within 3 metres of these pipes TW recommend the Developer sends a scaled ground floor plan of your property showing the proposed work and the complete sewer layout to developer.services@thameswater.co.uk to determine if a building over / near to agreement is required.

Surface Water Drainage.

It is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

Water supply

This is within the area covered by the Affinity Water Company.

Affinity Water

Comments awaited.

NHS Clinical Commissioning Group

Comments awaited.

Response to Neighbour Notification / Site Notices: Original Scheme

Objections from 1, 2 4 , 5 and 7 Langley Hill Close, 10 York Close, 20 High Street , 30 Railway Cottages and The Oak Barn at Love Lane.

• *Detrimental impact upon Langley Hill Close Residential Amenities*

1 Langley Hill Close. Loss of light, major overlooking/loss of privacy and significant visual intrusion with reference the garden and bedrooms.

2 Langley Hill Close . Loss of light, overlooking, loss of privacy, visual intrusion.

4 Langley Hill Close. Overlooking various homes affecting privacy as a result of converting Residential property to commercial, visual intrusion on the plot due to massive over development.

5 Langley Hill Close . Overlooking, loss of outlook and light.

7 Langley Hill Close. This is with reference to Dacorum Core Strategy Policy CS12 Quality of Site Design. Overriding harm resulting from the major 'towering ' physical impact - direct and major overlooking of the garden , bedrooms and living room windows with resultant of loss of privacy and night time glare into bedroom windows.

Full vision into No 7's east facing bedrooms especially from the extended north wing Care Home and by occupants of the proposed conservatory unit. The ineffectiveness of no.7's boundary wall , needing to be higher to prevent visual intrusion. Unable to continue to experience the quiet enjoyment of the garden- associated breach of Human Rights Act in particular Protocol 1, Article 1 stating individuals have a right to peaceful enjoyment. When no 7' s doors are opened there will be noise problems resulting in summer noise from outdoor activities at the Care Home garden.

- *General*

National Planning Policy Framework - 2012, Paragraph 17 outlines the set of core land use planning principles for planning guidance .The proposed development is a direct contravention of the contents of the policies stated in the National Policy Framework.

- *Visual Impact / Effect upon Character of the Area/ Cramped Overdevelopment / Relationship with the Conservation Area*

A major impact resulting from visual intrusion on the plot due to the massive over development overwhelming the village, with a resulting loss of character; far too large for the site and would not be in keeping with the current community. Even without the proposed surgery wing the Kings Langley Care Home will operate in cramped conditions that is 50% lower than another B&M site of similar residential capacity at its Crowthorne site. The development doubles the size of the original granted application.

The proposed development does not respect the local context and street pattern. In particular does not fit the scale and proportions of surrounding buildings. The north wing extension from ground level 3.73 metres high and will tower over our property. This exceeds the height of the Manor Cottages and considerably exceeds the height of garden fences.

The proposed surgery wing roof line is 4.64 metres above the height of the demolished no. 1 Langley Hill. The surgery wing will involve extensive excavation to lower the current ground level.

The Conservation Area boundary line is to be built over by the proposed Care Home north wing.

- *Parking/ Highway Safety Implications*

Highway Safety problems due to the potential visibility hazard on the existing Langley Hill Close junction -driving into a narrow road which is often obscured by parking on the grass verges and is particularly hazardous.

Omission of Revised Traffic Planning statement.

Langley Hill car park is always full at peak times and increasingly so at other times. There is inconsiderate parking on Langley Hill and illegal parking in Langley Hill Close (a private road) is already a problem, particularly at school drop off and pick up times. The parking situation on Langley Hill, High Street & York Close is already proving a real issue for residents of Kings Langley. These roads are already always congested in the mornings and when the school day finishes.

Parking in the locality is over stretched at the moment would become even more

impossible in the High Street and Langley Hill. Parking on Langley Hill is already at saturation point during the day and this creates congestion. The car park in Langley Hill is almost always full by 9am and this situation does not change throughout the day. The number of places allocated for residents, workers, visitors and doctors' patients at the new development is totally inadequate and would result in inevitable overspill at all hours of the day and night. Parking on Langley Hill is already at saturation point during the day and this creates congestion. Langley Hill Close is a private road- there are already issues with people parking on this road and ignoring the no parking signs because the public are unable to park anywhere else. This situation will only get worse.

A combination of problems arising from school traffic, emergency vehicle access and pedestrian safety.

The proposal will overwhelm existing stressed parking facilities. There will be a detrimental impact on Langley Hill Car Park which is regularly full, resulting in increased over parking on Langley Hill directly opposite Langley Hill Close, which already causes Safety issues during peak times.

The stated aims of the Surgery include the ability to expand their patient list and to provide additional services which will be required with the possible growth and demands of the local community. This will necessarily give rise to the need for rather more parking facilities than either exist or are proposed and priority should be given to making sure that the existing village facilities and services are satisfied before embarking on new unplanned consequences.

Relying on the existence of a local car park not satisfactory. To suggest that all if not most of the staff will walk to the care home is unrealistic and there is simply no parking provision for those visiting the care home residents let alone staff. The result will be that roads such as Langley Hill, York Close and Archer Close will suffer from double parking which will in turn cause traffic, congestion and pose a serious risk to local residents and the many children who walk to school at the top of Langley Hill.

- *Questions regarding the Application of the Parking Standards*

It is unclear whether the Council would consider the development as Elderly persons / nursing home or residential care home, either way the parking requirements are similar - 1 space per 5 beds, or 0.25 spaces per bed as well as provision also needing to be made for staff parking

Care Home: Existing 36 + proposed 26 bedrooms = $62 * 0.25 = 15.5$ spaces plus provision for staff. There was a discussion between the owner of no. Langley Hill Close and the Chief Executive of B&M Care Homes during the Case Officer site visit. The CE stated there would be a maximum of 20 staff on during any one shift. This number seems very conservative and is questioned what checks the Council will make to ensure this isn't a number just used to 'lowball' the staffing levels to justify the grant of planning permission and then disregard this number if it came to actually needing to staff the development. The CE stated about 70% of the staff would drive and therefore need parking and again this seems low but even based on that assumption there will need to be 14 car parking spaces (0.7×20) for staff.

The GP surgeries require 3 spaces per consulting room + 1 space per employee other than doctors. GP surgery: 3 consulting rooms = 9 spaces (+ an allowance for an

undefined level of staff). Therefore there is a parking requirement of 38.5 spaces not taking into account the allowance for an undefined level of staff who are not doctors.

- *Village Centre Viability/ Major Negative Business Implications*

The inadequate parking will have a negative impact on the local businesses and residents that either use or rely on the parking for such needs. Shop owners know that all business to retail parks when the local parking is full. Parking for the development will take away customer access to villages businesses and potentially having a fundamental effect upon the livelihoods of the owners and employees. It would also be detrimental to the High Street and its businesses if people cannot park easily.

- *Land- Ground Stability.*

There is risk of potential damage to Langley Hill Close's gardens and road. The Design and Access and Planning Statement does not define measures that might be needed to protect the roadway and communal amenity area of the managed Langley Hill Close from damage and subsidence resulting from excavation damage. No details of the excavation are given in the Design and Access and Planning document. The excavation at the No 1 Langley Hill plot has the potential to collapse the very old boundary wall .

Risk of damage during excavation of the old wall that is part of the No1 Langley Hill plot. Visual inspection of this boundary wall shows the construction and application of irregular sized hand manufactured bricks, an old method of top capping reminiscent of styles used in the gardens of old Manor Houses. Despite the requests by Langley Hill Close residents the previous owner showed no interest in maintaining this very old wall. Residents efforts to identify the construction methods are incomplete because of time constraints. The location of the wall is part of No 1's Langley Hill property about three metres west of the Conservation Area Line Boundary is not described in PPML's Design and Access and Planning Document.

- *Other Issues*

Criticism of the neighbour consultation process.

Fundamental criticism of the pre application process and how the Council has previously acted.

Questions regarding the plan accuracies (also Dacorum's Planning Application Documents omits the plan shown on page 13 of the Design and Access and Planning Statement.

Criticisms of the application's moral ethics.

Unrealistic and potentially damaging to the balance of the community.

Criticism of Design and Access and Planning Statement including reference to the current usage patterns of the immediate area which has historically featured gardens and reference to air-conditioning.

This was registered as full application and should have been a major application.

Response to Neighbour Notification / Site Notices: Revised Scheme.

Objections from 1 and 7 Langley Hill Close and The Oak Barn.

Adverse impact upon the Residential Amenity of no. 1. Reiteration of previous objections .

Effect upon no. 1. Overlooking/ Loss of Privacy. Although plans have been changed to replace the 5 large bedroom windows overlooking the property with velux windows there are still 2 large corridor directly overlooking our garden, living area & bedroom. There is no justification for these which could be bricked up (like many corridors) or have obscured/frosted glass with limited opening. Associated visual intrusion.

Over development cramped for area. Visual intrusion in Langley Hill Close.

Parking and Highway Issues. As before.

Fundamental criticisms of Hertfordshire County Council Highways in assessing the development. This is with reference to the following response/ comment:

"The applicant did not provide Traffic Flow Analysis" but "assured" the Herts. Highways that there would be no effect on the village.

Herts.Highways did NOT do any analysis. also citing the fact that there is a 55 space carpark across the road.

This is a complete failure of Herts Highways to correctly assess the application and take suitable responsibility. This is with reference to accepting vague assurances of the Applicant who has a vested interest in seeing the application passed without fact checking and looking at all of the implications of finding parking for staff, doctors, outside workers and visitors. HCC Highways should have requested the estimated numbers for all of these and recognise that that 17 or 18 parking spaces will be insufficient and that the adjacent car park is always from 8:30 to 18:30 and therefore can offer no overflow for the care home. This would clearly demonstrate that any cars from the care home would be seeking parking in the village, thereby disrupting and significantly impacting the village. If this has been carried out HCC Highways should have recognised that the Traffic Flow Analysis is extremely important and necessary. HCC Highways must fulfil its obligations and responsibilities before any further consideration of the application. The village parking situation is already critical for both residents and traders. These concerns must be taken into serious consideration and it will be a grave injustice if this plan is allowed to pass without due consideration of facts and not the comments and advice of the applicant.

Commencement of the excavations of the extended basement affecting the main block without 'official approval'. It is assumed that permission to commence was given by a Council representative, The relevant department /employee ignored the adverse criticism from the general public.

Questions regarding the submitted drawings.

Considerations

The key issues are:

- Principle.
- Design/Layout.
- Residential Amenity.
- Highway Safety, Access, Traffic and Parking Implications.
- Drainage.

Policy and Principle

This is with reference to the appropriateness of additional residential care development and a new surgery at the site, the loss of a family dwelling and the vitality and viability of Kings Langley Local Centre.

The site is located within Kings Langley which is a defined Large Village. Dacorum Core Strategy Policy CS1 (Distribution of development) expects that the Borough's Large Villages will accommodate new development for housing, employment and other uses. This is provided that it:

- a). is of a scale commensurate with the size of the settlement and the range of local services and facilities;
- b). helps maintain the vitality and viability of the settlement and the surrounding countryside and,
- c). causes no damage to the existing character of the settlement or its adjoining countryside.

Nos. 32 and 34 High Street are also with Kings Langley Local Centre. Under Policy CS4 (Towns and Villages) a mix of uses are acceptable in the Borough's Large Villages. These include shopping, compatible leisure, business, residential and social and community uses. It is expected that retail, business and residential uses will be controlled to enable a broad range of uses to be maintained/ achieved.

In meeting Community Needs Dacorum Core Strategy Para 15.14 (Health) explains that the Council has established a need for suitable practice buildings and delivering new practices near to areas of housing growth. This is set against Para. 15.1's explanation of the importance of the well being of Dacorum's communities which is dependent upon the provision of 'the appropriate social infrastructure'. Figure 14 defines this, including primary and secondary care. In this context the provision of the surgery will accord with Dacorum Core Strategy Policy C23 (Social Infrastructure) which encourages services and facilities to the community in locations to aid accessibility with support for dual use purposes. The proposal accords with the NPPF Core Principle 12 which is to 'take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs'.

Part 14 of Dacorum Core Strategy addresses Providing Homes with Large Villages (such as Kings Langley) meeting their own their owned locally generated needs and brownfield sites performing a key role. In terms of housing mix Para 14.25 explains that

with an ageing population special attention must be given to the needs of the elderly, with an emphasis upon enabling the elderly to remain in their own homes for as long as possible.

Dacorum Core Strategy Policy CBS 17 (New Housing) expects existing housing to be normally retained. Saved DBLP Policy 15 addresses the retention of existing housing with loss of dwellings being not normally permitted subject to certain criteria. In this location exceptions include :

- within defined residential areas where small scale social, community or leisure facilities would be provided and,
- where overriding planning advantages would result.

The applicant states that the proposal will assist with meeting an identified need for residential care in the area.

The provision of new residential care development at the site accords with Core Strategy CS1 on this brownfield Village site. It will positively consolidate the provision of elderly care facilities at the site of no. 32 by expanding the approved scheme with due regard to saved DBLP Policy 71 (Community Care) :

“development of community care facilities for the handicapped and elderly will be encouraged in residential areas provided: (a) schemes incorporate adequate space for necessary ancillary services, amenity and visitor car parking; and (b) there is no over-concentration of community care facilities.”

The loss of the single family dwelling house is balanced against the following:

- The provision of a significant number of additional elderly care rooms in a modern purpose built facility in contrast to an adapted/ converted or extended building.
- The establishment of a similarly modern fully inclusive new doctors surgery.
- The potential for the existing doctors surgery to be converted to residential , with one or more units, compensating for the loss of no. 1, notwithstanding that it is not within the specific remit of the application.

It is concluded that in principle- despite the loss of the single dwelling - there will as a result of the development be overriding planning advantages under criteria (d) of saved DBLP Policy 15. This will be due to the provision of the modern community surgery which outweigh this harm and moreover reinforced by the other housing stock benefits of the provision of the proposed additional elderly persons accommodation.

The proposed surgery relocation so close to the existing doctors surgery will benefit existing patients and serve new patients, including the proposed care home. The shared benefits of two coexisting inclusive complimentary uses within 'a sustainable community hub' are the availability of medical services for the care home with emergency vehicle turning facilities and key operational parking with full access for persons with disabilities'/ limited mobility.

It is acknowledged that there is an ongoing very significant local concern regarding the negative impact that the development will have upon the vitality and viability of the Local Village Centre resulting from the loss of key parking in the adjoining car park due

to increased demand by users of the application site which is addressed below under Highway Issues. It is not considered that in this respect there is robust evidence available to the Council to substantiate that the development would have a negative effect upon the local centre's future. Such a new development can encourage linked trips by users of the surgery and employees of both developments.

Impact upon the Listed Building /Setting of adjoining Listed Buildings/Design /Layout/Character and Appearance of the Conservation Area

This is with due regard to Dacorum Core Strategy Policies CS 1, CS 10, CS11 CS12, CS13 and CS 27, saved DBLP Policies 119 and 120 and its relevant Appendices and the NPPF's approach to heritage/design, as expressed through Historic England's response. NPPF Paragraph 134 notes:

'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use'.

The previously approved care home is regarded as a very high quality development in replacing the very brutal utilitarian former and now demolished Post Office Sorting Office in such a key part of the core of the Conservation Area/ village centre. There is the associated benefit from the associated Tree Preservation Order which safeguards very valuable frontage of trees within the local street scene of the Conservation Area. The TPO was in response to the 2012 application.

The proposal represents a very substantial enlargement of the approved scheme by amalgamating the proposed enlarged care home with the new surgery. Despite the development's significant scale resulting from the combination / agglomeration of the approved and proposed developments, the scheme takes advantage of the site levels in a positive way and will be contained within the site's 'envelope' .

The Revised Scheme in design terms will successfully 'visually fuse' with the approved Care Home scheme, moulded into to the site's topographical features and respecting the site's current physical relationship with the Langley Hill street scene and Langley Hill Close. The development will be visible from Langley Hill Close. The proposed building's form/ massing / profile whilst different to the existing will respect the context and relationship of the existing dwelling at no.1 with both the Langley Hill and Langley Hill Close street scenes. It will not be over assertive, but complimentary. Therefore subject to the changes recommended by the Conservation & Design Team addressed through recommended Condition 5, the Revised Scheme can make a positive change to the Langley Hill frontage with a neutral effect upon Langley Hill Close .This will be facilitated by the pivotal role of the permanent retention of the boundary wall to Langley Hill Close.

For clarification it is important to confirm that in reviewing its original delayed informal advice, the Conservation Team has raised no objections. This has taken into account Historic England's response including its reference to 'any harm would seem likely to be limited' and in recommending some small changes under the aforementioned

Condition 5. There are no adverse arboricultural implications.

It is fully acknowledged why there is local concern regarding the development's scale, however it is a substantial site which benefits from level changes, enabling the development to be successfully absorbed into its heritage setting. In terms of layout it has been necessary to seek amendments to the Original Scheme resulting in changes to the design/ layout reflected by the reduction of bedrooms to the now 21 from the original 26. This has been to overcome the harmful impact upon no. 1 Langley Hill Close and ensures that some rooms have an adequate quality resulting from the effect of the retained boundary wall to Langley Hill Close (see under Residential Amenity below).

Effect upon Residential Amenity and the Amenity of the Care Home Bedrooms

This is with due regard to the expectations of Dacorum Core Strategy Policies CS10 and CS 32 and saved DBLP Appendix 3, reference to the physical impact, privacy/ overlooking, noise/ disturbance and the receipt of day and sunlight and the expectations of NPPF Paragraph 123. There have been respective very strong representations received from nearby nos. 1 and 7 Langley Hill Close.

No. 1 Langley Hill Close. The Original Scheme was unacceptable. The Revised Scheme has significantly changed the relationship with no. 1 Langley Hill Close by deleting the 5 flat roof bedroom dormer windows opposite and facing towards the front garden/ windows of this dwelling eliminating direct overlooking. The modification of the layout, the provision of high level windows and a recommended condition regarding the linking corridor overcomes the previous objections due to the loss of privacy. With due regard to a comparison between the existing and proposed profiles of the existing and proposed buildings and the issues of physical impact , the receipt of light, noise and disturbance there are now not reasons to refuse the application.

No. 7 Langley Hill Close . Based upon the amount of separation, levels, existing boundary treatment, the opportunity to provide additional acoustic fencing for the Care Home communal garden and glazing there would not be a case to refuse the application based upon the loss of privacy and noise/ disturbance. Noise generated by the impact of the use needs to be considered against the previous potentially 24/7 commercial use at no. 32 and that the buildings will contain the impact of vehicular movements.

Other Dwellings. There would not be a case to refuse permission. As clarified as Langley Hill Close is private the public are unable to use this cul de sac for parking. Therefore noise/ disturbance resulting from the development's associated vehicular activity could not be substantiated.

Internal Layout: Residential Amenity of the Ground Floor Residents Rooms facing the Retained Boundary Wall to Langley Hill Close

The retention of the wall abutting Langley Hill Close boundary wall has been an essential heritage expectation.

In terms of layout officers have expressed major amenity concerns regarding the effect of the retained wall.

This is due to the wall's height and closeness to the residents only bedroom windows of the western First Floor Rooms 37, 39 and 41 within the Block including nos. 35 and 42. The retained wall will have a very significant adverse effect upon the amenity of these rooms due to its resultant very oppressive/ overbearing/ claustrophobic impact and the receipt of light because of the cramped form of this part of the layout. This part of the scheme fundamentally fails to comply with the layout expectations of saved Appendix 3 of the DBLP and one of the NPPF Core Principles under Para 17 which always seeks to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.

The layout has not needed to be changed. To the contrary the Agent has responded by agreeing to the imposition of a condition specifying that the permission does not extend to the use of Rooms 35, 39 and 41 as bedrooms. These rooms could be used for alternative purposes serving the Care Home. The rooms at each end (35 and 42) of this block of 5 rooms will benefit from second windows.

Highway Safety/ Access/ Emergency - Refuse- Service Access/Parking/ Traffic Generation/ Sustainable Location /Inclusive Access/ Access for Persons with Disabilities

Highway Safety and the Main Access/ Traffic Generation. HCC Highways raise no objections to the use of the existing serving the former depot. This is with due regard to its historic use, the previous permission for the care home, the traffic impact/ volume, location and design (width/ sight lines). This takes into account its closeness to the existing accesses at the car park, Langley Hill Close and the Langley Hill- High Street junction. With due regard to the NPPF 's Paragraph 32 requirements regarding a transport statement / assessment and the form of the proposal.

Access Road and Turning Area for Fire, Ambulances and Refuse. The access is acceptable to HCC Highways and Hertfordshire Fire & Rescue Service. Although the Refuse Controller has been unable to respond the access is workable for these purposes.

Access for Persons with Disabilities/ Inclusive Access/Persons with Limited Mobility. Both uses will be required to satisfy these fundamentally important expectations. Based upon the technical advice to date and the submitted layout/ design, the development will be compliant with the surgery on the ground floor. The surgery's 2 disabled spaces will enable drivers to bring patients / residents close to the building by vehicle. This is an important community benefit representing a significant improvement to the current surgery. The layout also provides for ambulances unlike no. 34.

Sustainable Location. The site's central village location is very sustainable. It is close to some residential parts of Kings Langley, accessible by foot or cycle, with a bus stop outside no. 32. There are very regular bus services along the key 501 along the Aylesbury- Watford A41 spine corridor with excellent links to the wider bus network in both directions, accessing the surgery's existing catchment area. On this basis

employees of both the surgery and care home are able to access the site by alternatives to cars with shift patterns coinciding with bus frequency. Similarly the surgery's able bodied patients and visitors to the care home can access this way. The Care Home is provided with cycle storage and a condition is recommended for cycle storage serving the surgery. HCC Highways recommended imposition of a Green Transport Plan is an important prerequisite.

It is also clarified by B & M Management:

- In B & M's experience staff at its Care Homes do tend to be primarily from the local community and will walk to work if the distance is reasonable – so this is a realistic expectation for this proposal. Generally B & M staff group avoid any lengthy commutes and prefer a short travel distance/time to work.
- Staff shift patterns are morning shifts starting 7-8 am, afternoon shift changeover at 2pm and evening/night shifts start 7-8pm – thus avoiding the peak traffic rush hour times.
- Each B&M Care Home is provided with a Pool Car and this enables a 'Car Sharing' with a 'Guaranteed Ride Home' Scheme to be feasible, workable and economically attractive to staff.
- Travel and parking management and co-ordination can be achieved by making this part of the job responsibilities of say the Deputy Care Home Manager and the Surgery Practice Manager to liaise regularly as 'travel plan co-ordinators' to ensure efficiencies are achieved and potentially problematic situations avoided, this is also a requirement of the Travel Plan.
- The use of cycles by staff does happen with reasonable regularity across our group of homes where travel distances are reasonable and this is again a realistic expectation of this location. Facilities to support cycle use will be incorporated.

Parking Provision.

Care Home. The provision of 15 parking spaces accords with the requirements with saved DBLP Appendix 5 which requires the provision of 0.25 spaces per resident bedspace with no resident staff. Two of the spaces will be usable for persons with disabilities. With the overall reduction of bedrooms to 57 from the original cumulative 62 the requirement is 14.25 spaces.

Surgery. As confirmed there are 3 GP consulting rooms and 1 nurses procedure room are proposed at the surgery. Under the aforementioned adopted maximum parking standards surgeries require 3 spaces per consulting room and 1 space for other non doctors staff employees. On this basis and the staffing at the current surgery (taking into account the number of part time staff) it has been assessed that during the day time 16 on site spaces are required under the maximum standard. This can be reduced to 12 spaces as this commercial use is located in Kings Langley Parking Accessibility Zone 4 which allows for the provision of between 75 and 100% provision of this maximum standard. As the cleaners will be visiting the site in the evening their parking requirements have been excluded from the calculation.

Despite the significant day time on site shortfall of 8 spaces in relation to the maximum standards it should be reasonably taken into account that:

- there is no parking at no.34 with inadequate disabled access ,

- two of the spaces at the care home can be available for the surgery as referred to by recommended Condition 12,
- the benefits of a Green Transport Plan as recommended by HCC Highways in accordance with NPPF Para 36,
- the sustainable location,
- according to the Agent the proposed Surgery in terms of floor area would appear similar or possibly smaller but with much more efficient use of space, allowing the practice to add one additional GP in the future if the needs of the Town require it, without the need to relocate,
- the proposal provides the benefits of a modern inclusive facility which cannot be provided at no. 34. In this respect the CQC Report for the existing surgery observed that to '... operate (sic) from a listed building, the structure and layout of the building presented many challenges including space limitations and little scope for extensions or structural alterations',
- B & M Management confirm those visiting the surgery will rely on the public car park as at present. This car park was donated to Kings Langley to be used as a free car park in perpetuity by Dr Doris Brown from Haverfield Surgery in 1968, and
- Conflicts between Surgery and Care Home Visits. The Care Home Visits by friends , families and volunteers tend to be off peak daytime on weekdays plus early evenings and at weekends ; all what would be termed 'off peak' times.

In the context of all the above factors it is questionable whether there would be a very robust reason to refuse the application based upon this shortfall the overriding evident public community benefits arising from the development. Moreover, if the additional parking is provided this would reduce the capacity of the site for the surgery and/ or care home which are aimed to benefit this inclusive community orientated development.

It could be also taken into account that albeit outside the remit of the application but with respect to Haverfield Surgery's legacy and the Parish Council's objections, that the existing public car park could be redesigned to increase its capacity to provide an area of surgery only parking without affecting the existing capacity. This could ' neutralise' the ongoing local concerns enabling maximum attention to the community benefit.

Drainage

The Lead Flood Authority's objection has now been addressed.

Other Issues

There has been no need for an Environmental Impact Assessment for this application.

With due regard to the policies material to the application, site/ area characteristics and the responses from the technical consultees there are no objections relating to the following with recommended conditions where relevant/ necessary:

- Ecological implications/ Biodiversity.
- Contamination.
- Archaeological Implications.

- Crime prevention/ security.
- Sustainable Construction.
- Light Pollution.

Conditions and Informatives

If the DCC supports the application a range of conditions are necessary, as recommend below. The LPA is unaware of any fundamental land stability/ geological issues to preclude the carrying out of the development, recommending an informative with reference to the NPPF Paragraph 120. The height of the development has not necessitated specialist air navigation advice.

Community Infrastructure Levy

Kings Langley is within Zone 2 for the CIL. Retirement Housing (C2) and GP Surgeries (D1) are not liable to this CIL charge.

Future Uses of the Development

If granted the Care Home has the following lawful uses under the Use Classes Order:

C2 Residential Institutions	Residential accommodation and care to people in need of care, residential schools, colleges or training centres, hospitals, nursing homes	Permitted change to state-funded school or registered nursery (and back to previous lawful use) (subject to prior approval)
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If granted the Surgery benefits from the following:

D1 Non-residential Institutions	Clinics, health centres, creches, day nurseries, schools, non-residential education and training centres, museums, public libraries, public halls, exhibition halls, places of worship, law courts	Temporary permitted change (2 years) to A1, A2, A3, B1 (interchangeable with notification)
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Conclusion

The Original Scheme was unacceptable and would have been recommended for refusal. In accordance with the government expected Article 35 protocol the LPA has been in dialogue with the applicant/ agent. Design/ layout changes have now been

achieved involving the resultant reduction of the number of Care Home bedrooms and the associated imposition of a range of conditions to address these.

There are well documented local objections including the development's scale. For design/ residential amenity reasons reducing the development's scale cannot be substantiated. It also has to be taken into account that the site's original post office building was very utilitarian in appearance and potentially an environmentally sensitive use. In contrast the current proposal's the servicing area will be enclosed by buildings of much higher design quality.

The new surgery will assist the Core Strategy's Delivering the Vision for Kings Langley Place Strategy by reinforcing the Village Centre service role. The proposed relocated Doctors Surgery will provide the local community with an inclusive safe high quality purpose built modern facility overcoming the current practice's documented operational problems, especially access for persons with disabilities and limited mobility and served by some curtilage parking. The Care Home will benefit from the closeness of the surgery and consolidate the provision of specialist elderly persons at the site.

In any decision there is need to carefully balance all the material considerations. As documented there are very strong Parish Council and local objections regarding the parking implications. The Care Home accords with the parking standards. It is fully acknowledged that the Surgery features a significant shortfall of parking. The fundamental question is whether there is an overriding requirement to meet the on site shortfall in such an excellent sustainable location and so close to the existing surgery which does not benefit from the parking now proposed for this wholly inclusive modern community facility. There is no robust evidence available to confirm that the development's parking demands will irrevocably harm the maintenance of the Local Centre's vitality and viability.

In pragmatically considering the proposals and in contrast to the local objections, it is concluded that the overall community / social infrastructure benefits resulting from the provision of a modern new surgery and care home should be given more weight than the disbenefits resulting from the rigid adherence to the implications arising from the shortfall off on site parking. This also takes into account that Hertfordshire County Council Highways raises no highway objections.

With the very recent resolution of the outstanding drainage issue there is now a case to recommend the grant of permission.

RECOMMENDATION - That planning permission be **GRANTED** for the reasons referred to above and subject to the following conditions:

ANNEX A: THE OPERATORS STATEMENT

Operators Statement

An Operators Statement by B&M Care has been prepared to explain the background to the company, their aspiration to create an extension to the Kings Langley care home, explanation and justification for the new GP Surgery and their long term commitment to the community.

The case is made within the operator statement and reads as follows:-

1. B&M Care are a local family owned business based in Hemel Hempstead of some forty years standing which develop and operate a Group of Residential Care Homes for the Elderly in the Home Counties.
2. The Company currently operate 22 Care Homes with approximately 1150 beds with a further 4 Homes currently under development. At present it has 14 Homes in Hertfordshire. B&M Care has over the years won numerous industry and civic awards for both the design of its homes and also for the care provided. The Company gained the Planning Permission on 11th January 2013 for a 36 bed Care Home for the site, replacing the old Post Office Sorting Office at 32 High Street, Kings Langley.
3. The Company was then approached in early 2015 by the Principals of the Haverfield Surgery, which is based at 34 High Street, Kings Langley, adjacent to the site, with an enquiry as to whether the Company would consider leasing some of the ground floor space to incorporate a GP Surgery to be located on the same site. (Copy email request in Appendix)
4. Haverfield is a local GP Practice serving the local community with a list size of approximately 3,500 patients. Following discussions between the GP Senior Partner Dr Corina Ciobanu and the Practice Manager Chris Stanley of Haverfield Surgery, with the Directors of B&M Care, including Dr Colleen Wood, Director and Clinical Advisor to B&M Care; consideration was given to looking at the design needs and possible cooperation, subject to space requirements.
5. Later in 2015 the opportunity arose which gave the possibility of meeting this request when the bungalow at 1 Langley Hill came onto the market for sale and the decision was made by the Directors of B&M Care to purchase this property which opened up the possibility of meeting with the request, whilst also increasing the size of the proposed Home to enable the capital investment to be made by B&M Care Group to the new Surgery premises fit for purpose, on a leasehold basis to the Surgery enabled by the additional care home beds that would be possible on the site making the proposals economically viable.
6. Following a series of discussions and the process of working up design the Company is now happy to submit its proposals to the Council requesting the support of the Councillors and Officers for an extension to the already granted Care Home to create a 'mews' style town centre complex with a Care Home of now 62 beds and a Doctors Surgery, all as detailed as in this Operators Statement and Planning Application.
7. B&M Care has been aware of the potential of some of its Elderly Care Homes to be to some extent "Community Hubs" and one of the key aspects of that, along with the current crisis in providing GP care into Care Homes, is to incorporate doctor's surgeries within the curtilage of future elderly care homes constructed by the Company where possible. This makes it potentially much more easy and economical to provide GP services into care homes as it can be disproportionality expensive due to the high needs of elderly residents.
8. This combined with the present Haverfield Surgery being in a listed premises which is unfit for purpose by modern standards, give an opportunity for new premises with fully disabled access and the opportunity for the Surgery to expand its activities, expand its list and reach its other aspirations and ambitions to provide overall improved services and joint community benefits to the local community. This coincided with the Surgery's existing lease coming to an end.
9. We enclose in the Appendix a copy of an excerpt from the NHS England GP Premises Team Inspection Report of August 2015 which states that "whilst acknowledging that the Practice is taking reasonable measures to improve access to patients, the premises are not Equality Act 2010 compliant in most aspects". Particularly it mentions the main entrance which

is via a steep sloped access which exceeds the recommended gradients, and the disabled access which has actually been created by a side entrance with a portable ramp, no automatic door and a narrow width door of 80cm.

10. The proposed new premises would be fully Equality Act 2010 compliant, with automatic doors of the required width, split level reception desk, male and female disabled access WC's for patients, with emergency pull cords etc. as required, facilities for mobility scooters to access the premises and park and all facilities on a single storey at ground floor level.

11. Discussions have also taken place with agreement in principle to a proposal also to put a community defibrillator on the walls of the Care Home / Surgery Practice for twenty-four hour use to the benefit of the community.

12. There has been a history of a 'Doctors Surgery' going back to 1747 in this position on Kings Langley High Street, contained in the house known as 'Haverfield'. An excerpt from Kings Langley Archivists Group shows the on-going presence of a Surgeon or General Practitioner or Apothecary or similar, virtually consistently in Haverfield since the mid 1700's through to the present day. A copy of this is also contained in the Appendix.

13. Further, in particular, Dr Doris Brown ran a Surgery in the house from 1958 until her death in 1968 and it is stated that when Dr Doris Brown died in 1968 most of the grounds of the rear of Haverfield was given to the Council for car parking space, which provides in the region 55 spaces in the existing car park, free of charge and the entrance to this car park is directly opposite the entrance of this mews style, town centre proposed complex.

14. We enclose also in the Appendix also two letters written to the Council by Haverfield Surgery Principals and the Kings Langley Physiotherapy Principals regarding the car parking situation and the request of Dr Brown to the community of the car park to the rear of Haverfield Surgery which the town still benefits from.

15. All aspects to do with Highways, car parking, accessibility etc. are dealt with in the Design and Access Statement provide elsewhere in the planning submission.

16. These proposals would enable the Practice to continue the long standing tradition of having a Surgery centrally in the High Street of the town, despite not being able to continue and meet current statutory requirements in the Listed Building known as 'Haverfield'. The surgery would remain in a location immediately adjacent to where it has been for the most part of some 250 years.

17. The aspirations of the Surgery include the ability to expand their patient list and to provide additional services which will be required with the possible growth and demands of the local community.

18. It would enable the Surgery to employ a further Partner GP, be a qualified GP Trainer and become an accredited training practice helping to meet locally the NHS work force challenges of shortage of GPs and Practice Nurses and their 'on the job' training, supporting long term continuity of services.

19. Further the Practice would be able to offer additional services on the premises such as the expansion of current minor surgery services, expansion of maternity and family planning services, vaccine clinics etc., all to take place within the community rather than patients from Kings Langley having to travel elsewhere for these services.

20. The Practice would be able to bring in hospital consultants to offer out-patient consultations and clinics to all of the local community and not just the practice list without the need to travel to local hospitals.

21. Other clinics which are currently based in Hemel Hempstead or other hospitals can be brought into the community within the new facilities. This is moving services currently provided in the Acute Sector into the community where appropriate.

22. Part of the community respiratory services can be hosted on the High Street at the new facilities.

23. All of these measures are in the interests in the sustainable operations of communities, reducing travel and increasing accessibility to all members of the local community, particularly the most vulnerable who need care.

24. Consultations are being/will be held with local councillors and the representatives of the patient participation group connected with the Haverfield Surgery seeking to gain their support.

25. The provision within the proposed new Surgery would provide 3 GP consulting rooms, plus a Practice Nurse's Procedures Room, offering vaccine clinics etc., a meeting/ library/sessions room, administration offices, records storage with requisite reception waiting areas, public disabled wcs, staff toilets and kitchen facilities etc. Three car park spaces would be provided separate to the Care Home car park for staff members working at the premises.

26. The current proposal is to grant the Surgery an initial 15 year lease of the premises. The Surgery is currently led by Doctor Corina Ciobanu, who has been with the practice since 2004. Dr Ciobanu is the Senior GP partner at the Surgery and is Chair of Dacorum's GP Committee.

27. The additional provision that the proposals will provide for the proposed Care Home will allow it to provide a dedicated Dementia Care wing of 17 beds and dedicated low level dementia care beds as well as residential care beds. It will now also be able to provide a with a 'dementia garden' and the Home will benefit from the equivalent of two 'ground floors' due to the rising level / slope of the site from Kings Langley High Street up to Langley Crescent. This will allow the Home to provide three levels of care, meeting residential, low level dementia and higher level dementia needs of the elderly residents of the local community.

28. This model works well in many other of the Company's Care Homes and recognises the need throughout Hertfordshire for higher needs Dementia care. All residents will benefit from the presence of the Surgery adjacent and also from the many facilities provided within the proposed Care Home in the lower ground floor area such as Spa, Gymnasium, Chapel, Cinema, Hairdresser and Treatment Rooms etc.

29. Both B&M Care and Haverfield Surgery being local companies with a long term presence in their communities are approaching this project cooperatively with a long term commitment to the community of Kings Langley and would respectively request the support of the Councillors and Officers of Dacorum Borough Council for these proposals.

RECOMMENDATION - That planning permission be **GRANTED** for the reasons referred to above and subject to the following conditions:

- 1 **The development hereby permitted shall be begun before the expiration of three years from the date of this permission.**

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

- 2 The development hereby permitted shall be carried out fully in accordance with all the conditions subject to this planning permission and those subject to Planning Permission 4/01800/12/MFA on the land edged blue on Drawing No.34.**

Reason: To ensure the development is carried out in a cohesive way to ensure that the combined development is compatible with the setting of the adjoining listed building and the character and appearance of Kings Langley Conservation Area to accord with the requirements of Policies CS10, CS12 and CS27 of the Dacorum Core Strategy and the saved Policies 119 and 120 of the Dacorum Borough Local Plan.

- 3 No part of the development hereby permitted shall take place until details and samples (where appropriate) of the materials (including glazing) to be used in the construction of the external surfaces of the development hereby permitted shall have been submitted to and approved in writing by the local planning authority and the hard surfaced courtyard shall be constructed of permeable material in accordance with details submitted to and approved in writing by the local planning authority.**

Reason: In the interests of the character and appearance of the Conservation Area and the setting of the adjoining listed building and in the interests of sustainable drainage to accord with the requirements of Policies CS10 ,CS12, CS27 and CS29 of the Dacorum Core Strategy and the saved Policies 119 and 120 of the Dacorum Borough Local Plan.

- 4 All new external rainwater and soil pipes shall be formed in metal and painted black and all windows, doors and fascias shall be of timber and the rooflights shall be of a Conservation type.**

Reason: In the interests of the character and appearance of the Conservation Area and the setting of the adjoining listed building to accord with the requirements of Policies CS10 ,CS12 and CS27 of the Dacorum Core Strategy and the saved Policies 119 and 120 of the Dacorum Borough Local Plan.

- 5 Notwithstanding the details shown by the submitted and approved drawings no development shall be commenced until details of the following shall have been submitted to the local planning authority:**

- (a).Modifications to the entrance to the site from Langley Hill,**
- (b).Modifications to the building's elevation to Langley Hill,**
- (c).Details of the obscured glazing and window openings of the corridor link adjoining Langley Hill Close, and**
- (d). The installation of an additional window to the northern flank wall of Bedroom 35.**

The development shall be constructed fully in accordance with these approved details and thereafter the approved modifications under (a)

and (b) and the approved obscure glazing and window openings under (c) and (d) shall be retained at all times.

Reason: In the interests of the character and appearance of the Conservation Area and the setting of the adjoining listed building and to safeguard the residential amenity of nos 1 and 7 Langley Hill Close at all times to accord with the requirements of Policies CS10 ,CS12 and CS27 of the Dacorum Core Strategy and the saved Policies 119 of 120 of the Dacorum Borough Local Plan.

- 6 Notwithstanding the submitted details this planning permission is for 21 bedrooms within the Care Home extension hereby permitted excludes the use of First Floor Rooms 37, 39 and 41 as individual bedrooms in the Revised Scheme. Any alternative use of Rooms 37, 39 and 41 shall be agreed in writing by the local planning authority.**

Reason: First Floor Rooms 37, 39 and 41 are shown to be served by single windows facing the retained brick wall abutting Langley Hill Close. The amenity of these rooms will have very poor amenity due to the closeness and height of the boundary wall resulting in a cramped form of development. The environment for these rooms will be very poor due to the overbearing and oppressive impact of the wall, contrary to the expectations of saved Appendix 3 of the Dacorum Borough Local Plan.

- 7 The approved soft landscape works and those subject to Planning Permission 4/01800/12/MFA shall be carried during the first planting season following the first use of the development hereby permitted. For the purposes of this condition the planting season is between 1 October and 31 March.**

Reason: To ensure that the development is compatible with the setting of the adjoining listed building and the character and appearance of Kings Langley Conservation Area to accord with the requirements of Policies CS10 ,CS12 and CS27 of the Dacorum Core Strategy and the saved Policies 119 and 120 of the Dacorum Borough Local Plan and in the interests of biodiversity and to accord with the sustainable approach to development to accord with Policy CS29 of the Dacorum Core Strategy.

- 8 Any tree, hedge or shrub which forms part of the approved landscaping scheme and also subject to Planning Permission 4/01800/12/MFA which within a period of five years from planting fails to become established, becomes seriously damaged or diseased, dies or for any reason is removed shall be replaced in the next planting season by a tree , section of equivalent hedge or shrub of a species, size and maturity to be approved by the local planning authority.**

Reason: To ensure that the development is compatible with the setting of the adjoining listed building and the character and appearance of Kings Langley Conservation Area to accord with the requirements of Policies CS10, CS12 and CS27 of the Dacorum Core Strategy and the saved Policies 119 and 120

of the Dacorum Borough Local Plan and in the interests of biodiversity and to accord with the sustainable approach to development to accord with Policy CS29 of the Dacorum Core Strategy.

- 9 **Prior to the commencement of the development hereby permitted details /samples of hard landscaping(including boundary treatment, full details of the retained existing boundary wall to Langley Hill Close, permeable surface materials and external drying facilities) shall have been submitted to and approved in writing by the local planning authority. The details of the retained boundary wall shall include a full constructional method statement in relation to the adjoining land within Langley Hill Close with reference to land and wall stability.**

The approved materials shall be used in the implementation of the development and all the approved boundary treatment and any associated hard landscaping shall be carried out / installed prior to the first use of the building or the approved amenity area and thereafter shall be retained at all times.

Reason: In the interests of the character and appearance of the Conservation Area and the setting of the adjoining listed building, biodiversity and in the interests of the residential amenity (especially no. 7 Langley Hill Close with regard to the issues of privacy and noise attenuation) and land stability to accord with the requirements of Policies CS10 ,CS12, CS27 and CS32 of the Dacorum Core Strategy and the saved Policies 119 and 120 of the Dacorum Borough Local Plan.

- 10 **The details of boundary treatment in accordance with Condition 9 shall include a scheme for additional boundary treatment with specific reference to acoustic measures in relation to 7 Langley Hill Close. All the approved boundary treatment and any associated measures shall be installed prior to the first use of any part of the development including the approved amenity area and thereafter the approved boundary treatment shall be retained at all times.**

Reason: In the interests of the character and appearance of the Conservation Area and the setting of the adjoining listed building and in the interests of the residential amenity, especially no. 7 Langley Hill Close with regard to the issues of privacy and noise attenuation to accord with the requirements of Policies CS10 ,CS12 and CS32 of the Dacorum Core Strategy.

- 11 **The development hereby permitted shall not be occupied until the access arrangements and turning facilities shown by Drawing No. 25 Revision A have been provided fully in accordance with the approved details. Thereafter the access and turning area shall be retained at all times and only used for the approved purposes. The access road and turning area shall be constructed so that they are capable of bearing the weight of a 15.5 tonne vehicle and have a gradient of no less than 1 in**

20.

Reason: In the interests of highway safety and to ensure that emergency and service vehicles are able to serve the development at all times in accordance with Policies CS8 and CS12 of Dacorum Core Strategy.

- 12 The development hereby permitted shall not be occupied until all the approved arrangements for vehicle parking (including those for persons with disabilities) shown by Drawing No. 25 and cycle storage shall have been provided, and they shall not be used thereafter otherwise than for the purposes approved and two of the allocated spaces for the Care Home shall at all times be available for the surgery hereby permitted. An additional cycle storage facility shall at all times be installed within the area adjoining the parking area serving the surgery fully in accordance with details submitted to and approved in writing by the local planning authority.**

Reason: To ensure the adequate and satisfactory provision of off-street vehicle parking facilities including persons with disabilities in accordance with Policies CS8 and CS12 of Dacorum Core Strategy and saved Policy 63 of the Dacorum Borough Local Plan.

- 13 Prior to the first occupation of the development hereby permitted a Green Travel Plan shall be submitted to the local planning authority. The Travel Plan shall provide details of measures for reducing car dependency, the need to travel to site by car whilst promoting alternative modes of transport such as walking, cycling and use of public transport. This shall be prepared in accordance with the Guidance Note "Developing a Green Travel Plan" by Hertfordshire Technical Chief Officers. The approved Green Travel Plan shall be carried out fully in accordance with the approved details.**

Reason: In accordance with the sustainable transportation policies of the development plan in accordance with Policies CS8 and CS12 of Dacorum Core Strategy.

- 14 All the windows of the development hereby permitted shall be installed with glazing to limit noise transmission fully in accordance with details submitted to and approved by the local planning authority and any bathroom windows of the development hereby permitted shall be permanently fitted with obscured glass. The development shall be carried out fully in accordance with the approved details and thereafter the approved glazing shall be retained at all times.**

Reason : In the interests of residential amenity to accord with Policies 12 and 32 of the Dacorum Borough Core Strategy.

- 15 All remediation or protection measures identified in the Remediation Statement approved under decision 4/01237/14/DRC, (for the discharge of condition 14 of Planning Permission 4/01800/12/MFA), shall be fully**

implemented within the timescales and by the deadlines as set out in the Remediation Statement and a Site Completion Report which shall be submitted to and approved in writing by the local planning authority prior to the first occupation of any part of the development hereby permitted.

For the purposes of this condition a Site Completion Report shall record all the investigation and remedial or protection actions carried out. It shall detail all conclusions and actions taken at each stage of the works including validation work. It shall contain quality assurance and validation results providing evidence that the site has been remediated to a standard suitable for the approved use.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policies CS31 and CS32 of the Dacorum Core Strategy.

- 16 No part of the development hereby permitted shall not occupied until a scheme for ventilation of the premises, including the extraction and filtration of cooking fumes and the system for laundry has been submitted to and approved by the local planning authority. The approved scheme shall be retained at all times.**

Reason: In the interests of safeguarding the residential amenity of the locality and the character of the Conservation Area to accord with the requirements of Policies CS12, CS27, CS29 and CS32 of the Dacorum Core Strategy and the saved Policy of 120 of the Dacorum Borough Local Plan.

- 17 Details of all exterior lighting to be installed at the application site shall be submitted to and approved in writing by the local planning authority. The exterior lighting shall be installed and thereafter retained fully in accordance with the approved details.**

Reason: In the interests of safeguarding the character and appearance of the Conservation Area, the setting of the adjoining listed building, the residential amenity of the locality, highway safety, biodiversity, access for persons with disabilities and crime prevention/security in accordance with Policies CS12, CS27, CS29 and CS32 of the Dacorum Core Strategy and Policy 113 and Appendix 8 of the saved Dacorum Borough Local Plan.

- 18 The approved facilities for the storage of refuse shall be provided before the development hereby permitted is first brought into use and thereafter shall be retained at all times.**

Reason: To ensure a refuse facility is provided at all times at the site in accordance with Policy CS12 of the Dacorum Borough Local Plan.

- 19 Before the commencement of the development hereby permitted a**

Sustainable Design and Construction Statement shall be submitted to the local planning authority. The development shall be constructed and maintained in accordance with approved scheme.

Reason: To ensure the sustainable development of the site in accordance with Policy CS29 of the Dacorum Core Strategy.

20 No development hereby permitted shall commence until the following are submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority.

- **Details of wheel cleaning facilities for construction vehicles,**
- **A Construction Traffic Management Plan and Access Route (s) ,and**
- **A scheme for on-site parking for construction workers. The scheme shall be implemented throughout the construction period.**

Reason: In the interests of highway safety and residential amenity in accordance with Policies CS8 and CS12 of Dacorum Core Strategy.

21 The development hereby permitted shall be carried out in accordance with the approved surface water drainage assessment carried out by Hydrock reference R/C161599/002.02 dated August 2016, and the following mitigation measures detailed within the Flood Risk Assessment :

- 1. Providing attenuation to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + climate change event.**
- 2. Provision of the drainage to include permeable paving, the attenuation tank and soakaway as indicated on drawing 'Proposed Layout Plan' drawing reference Dwg 35.**
- 3. Carrying out of the appropriate drainage strategy based on infiltration.**

The mitigation measures shall be fully carried out prior to the occupation/ first use of any part of the development hereby permitted and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason: To prevent flooding by ensuring the satisfactory disposal and storage of surface water from the site and to reduce the risk of flooding to the proposed development and future occupants in accordance with the aims of Policies CS12 and CS31 of the Dacorum Core Strategy and to protect groundwater to accord with the requirements of Policies CS31 and CS32 of the Dacorum Core Strategy.

22 No development hereby permitted shall be commenced until a detailed surface water drainage scheme for the site based on the approved Drainage strategy and 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 shall demonstrate the surface water run-off generated up to and including 1 in 100 year + climate change critical storm which shall not exceed the run-off from the undeveloped site following the corresponding rainfall event. The scheme shall subsequently be carried out in accordance with the approved details before the development is completed.

In accordance with the requirements of this condition the submitted details shall include:

- **Detailed engineered drawings of the proposed SuDS features including their size, volume, depth and any inlet and outlet features including any connecting pipe runs.**
- **Final detailed management plan to include arrangements for adoption and any other arrangements to secure the operation of the scheme throughout its lifetime.**
- **Detailed surface water run-off and volume calculations to ensure that the site has the capacity to accommodate all rainfall events up to 1:100 year plus climate change.**
- **Any areas of informal flooding should the system flood above the 1 in 30 year event.**

Reason: To prevent the increased risk of flooding, both on and off site in accordance with the aims of Policies CS12 and CS31 of the Dacorum Core Strategy and to protect groundwater to accord with the requirements of Policies CS31 and CS32 of the Dacorum Core Strategy.

23 Subject to the requirements of other conditions of this planning permission and those relating to Planning Permission 4/01800/12/MFA the development hereby permitted shall be carried out in accordance with the following plans:

Ordnance Survey 1:1250 Location Plan

Drawing Nos. 16, 17, 18, 19 Rev A, 20 , 21, 22 , 23, 24 Rev A, 25 REV A, 26, 27, 28, 29, 30, 31, 32 , 33 and 34

Reason: To safeguard and maintain the strategic policies of the local planning authority and for the avoidance of doubt.

ARTICLE 35 STATEMENT

Planning permission has been granted for this proposal. The Council acted pro-actively through positive engagement with the applicant during the determination process which lead to improvements to the scheme. The Council has therefore acted pro-actively in line with the requirements of the Framework (paragraphs 186 and 187) and in accordance with the Town and Country Planning (Development Management Procedure) (England) (Amendment No. 2) Order 2015.

Informatives

Land Stability

The government advice is that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

Highway Issues

1.Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence. Further information is available via the website <http://www.hertsdirect.org/services/transtreets/highways/> or by telephoning 0300 1234047.

2. It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to willfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence. Further information is available via the website <http://www.hertsdirect.org/services/transtreets/highways/> or by telephoning 0300 1234047.

Advice from Thames Water

1.Legal changes under The Water Industry (Scheme for the Adoption of private sewers) Regulations 2011 mean that the sections of pipes the developer share with neighbours, or are situated outside of the property boundary which connect to a public sewer are likely to have transferred to Thames Water's ownership. Should the proposed building work fall within 3 metres of these pipes TW recommend the Developer sends a scaled ground floor plan of the property showing the proposed work and the complete sewer layout to developer.services@thameswater.co.uk to determine if a building over / near to agreement is required.

2.Surface Water Drainage.It is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0800 009 3921. Reason - to ensure that

the surface water discharge from the site shall not be detrimental to the existing sewerage system.

Advice from Hertfordshire County Council Lead Flood Authority

For further guidance on HCC's policies on SuDS, HCC Developers Guide and Checklist and links to national policy and industry best practice guidance it is recommended there is reference to the LFA'S surface water drainage webpage: <http://www.hertfordshire.gov.uk/services/envplan/water/floods/surfacewaterdrainage/>