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Development Management
St Albans City & District Council
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16 September 2022

Dear Mr Burgess

PLANNING APPLICATION 5/2022/0927 LAND SOUTH OF CHISWELL GREEN LANE, CHISWELL GREEN

Further to our recent discussions, we are writing on behalf of the Applicants to provide additional information, and in some cases an update, in response to matters raised by consultees on the above planning application.

As noted, the information provided is 'additional' and intended to support reports and plans included in the original submission. It has, where appropriate, been discussed with consultees prior to its formal submission.

Section 106 Heads of Terms

We acknowledge receipt of your document outlining the current Heads of Terms for the Section 106 agreement, should the application be approved. These are agreed in principle and the Applicant's accept that in some cases a financial contribution will need to be paid. In this respect, we note that the figures identified by consultees have been based on the indicative mix and/or up to 391 dwelling figure set out in the outline application. As this could be subject to change at the reserved matters stage, appropriate formula will need to be included in the drafting of the Section 106 agreement to allow a precise figure to be calculated based on the final mix. The amounts requested are therefore seen as maximum figures.

Please also note that the request from HCC Growth & Infrastructure identifies that the terms related to the primary education contribution request and the safeguarded service site for the primary school will need to be subject to further discussions. These are ongoing but are a matter to be addressed through Section 106 drafting, and which we will commence in the lead up to planning committee. We will provide a further update in due course.

HCC Highways

Discussions with the Highway Authority have been ongoing post submission of the application, and agreement reached over a package of measures to mitigate the transport related impacts of the proposed development and encourage a modal shift towards sustainable forms of travel. Enclosed with this letter is an Addendum to the Transport Assessment which provide the detail of these discussions, and the agreed mitigation measures.

National Highways

A Technical Note was issued to National Highways on 11th August 2022 which responded to the comments made by National Highways on the submitted Transport Assessment. As you are aware, further data has

been requested in a meeting held with National Highways held on 16th September 2022 and we are in the process of agreeing an approach to address this as soon as possible.

HCC Public Health

Enclosed with this letter is a supplementary Health Impact Assessment report which has been prepared to assist you in addressing the comments made by the Health Improvement Co-Ordinator on the submitted HIA in your committee report.

HCC Landscape Comments

As you are aware, we met with HCC's Landscape Officer on the 12th September 2022. This was helpful meeting which provided all parties with reassurance that all outstanding matters can be resolved by providing further information now (e.g., addition wireline CGI) or as part of any future reserved matters application(s). Accordingly, the Applicants' response to the comments made by the Landscape Officer in her initial pre-application response is provided in the table appended to this letter. A LVIA Clarification Note has also been prepared which includes the illustration for the new viewpoint and includes the Applicants' response to the Landscape Officer's comments as a standalone document.

Others

The appended table also summarises the Applicants responses to all other comments made by consultees on the submitted application with the intention of assisting you in preparing your committee report.

We trust the contents of this letter and the enclosures are helpful in addressing the majority of the outstanding matters with the submitted application. As discussed, we are hopeful that you will soon receive a positive recommendation from the Highway Authority following submission of the Transport Assessment Addendum. We also look forward to continuing our discussions with respect to addressing the comments made by National Highways.

Yours Sincerely,



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Partner

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Planning Director

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- Enc. Transport Assessment Addendum
- Health Impact Assessment Supplementary Report
- Landscape and Visual Impact Assessment Clarification Note

Chiswell Green – Summary of Consultee Responses (as at 16th Sept 2022)

[last comment on SACDC website: 12th Sept 2022]

Legend:	 = Action Required	 = No Action Required
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Consultee Name:	Consultee Response:	Applicant's Response:
<p>Hertfordshire County Council (HCC) Grow & Infrastructure</p> <p>HCC Children's Services – School Place Planning</p>	<p>Due to the uncertainty currently surrounding the emerging St Albans Local Plan, in relation to an emerging growth scenario and housing target for the district, the county council cannot therefore commit to a timescale regarding the potential delivery for a new primary school and be certain as to when additional places will be needed. Therefore, HCC will be looking to safeguard a site for a new primary school within the application site, as opposed to seeking a detailed application for a new school at the reserved matters stage, should this outline planning application be approved.</p> <p>The county council notes that approximately 2ha of land has been set aside for a 2fe primary school on the north-western portion of the site, with access onto Chiswell Green Lane. Although the size of the site would appear to be in line with the county council's education land specification for a school of this size, it is noted that it has been situated within an area of the application site that is not flat and has existing structures and topographical features within it. In line with the county council's education land specification, HCC would normally only accept a site that has less than a 1:20 gradient and is free of physical landscape, or topographical features, as these may constrain its development and use for its intended purpose. HCC would not therefore be looking to re-use any of the existing structures that are currently on-site as part of any future primary school.</p> <p>Primary Education towards the expansion of Killigrew Primary and Nursery School or any primary school with expansion potential in the area (£3,024,011 index linked to BCIS 1Q2020). Please note that the amount quoted above is for indicative purpose only, it is expected that the final amount to be included in the S106 agreement and the terms and conditions with regards to the safeguarding serviced site will be set out through further discussion.</p> <p>Nursery Education included in the primary school provision above.</p> <p>Secondary Education towards the expansion of Marlborough Science Academy/ Samuel Ryder Academy or any secondary school with expansion in the area (£3,312,434 index linked to BCIS 1Q2020)</p> <p>Special Educational Needs and Disabilities (SEND) towards the delivery of new Severe Learning Difficulty (SLD) special school places (WEST) (£378,030 index linked to BCIS 1Q2020)</p> <p>Library Service towards increasing the capacity of community spaces in St Albans Central Library (£38,000 index linked to BCIS 1Q2020)</p> <p>Youth Service towards re-provision of the St Albans Young People's Centre in a new facility to accommodate larger numbers of young people £105,959 (index linked to BCIS 1Q2020)</p> <p>Monitoring Fees – HCC will charge monitoring fees. These will be based on the number of triggers within each legal agreement with each distinct trigger point attracting a charge of £340 (adjusted for inflation against RPI July 2021). For further information on monitoring fees please see section 5.5 of the Guide to Developer Infrastructure Contributions.</p>	<p>The HOTs are agreed. The Applicants are currently considering the 'up to' figures (£) and will advise in due course.</p> <p>Actions: A separate legal agreement between the Applicants and HCC is being prepared to agree the HOTs for the school land transfer and education contributions (Primary / Nursery, Secondary and SEND).</p> <p>All other HOTs are to be included in another Legal Agreement to be drafted and agreed by the Applicants and SACDC.</p> <p>In the meantime, SACDC can continue to prepare its committee report.</p>
<p>HCC Countryside & ROW</p>	No response received	N/A
<p>HCC as LLFA</p>	<p>Thank you for your application for Land South Of Chiswell Green Lane St Albans. Due to current on-going recruitment challenges in the Lead Local Flood Authority we are unable to respond to any new planning consultations.</p> <p>The LLFA is currently unable to provide our charge for Surface Water Drainage Advisory Service; this includes meetings and written advice, and we cannot respond to any queries, pre-application advice, or correspondence outside of the normal planning consultation process,</p> <p>Advice on what the LLFA expect to be contained within a Flood Risk Assessment / Surface Water Drainage Strategy to support a planning application is available on our surface water drainage webpages. The LLFAs policies on SuDS are contained within the Local Flood Risk Management Strategy 2 (LFRMS2). The Guidance for developers contains a Developers Guide and Checklist for developers to understand LLFA requirements. A climate change allowance note</p>	<p>The Applicants understand that LLFA continue to have resource issues and may not be in a position to respond for at least 6 months.</p> <p>SACDC have introduced a new scheme (from 25th July) whereby a drainage consultant (RAB consulting) will prepare a professional / independent response on the matter.</p> <p>Applicants have instructed RAB Consulting and its updated response is provided below.</p>

	<p>for Hertfordshire is also detailed. These are all available under Policies and Guidance on our website: https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/surface-water-drainage/surface-water-drainage.aspx#</p> <p>All additional drainage / flood risk information in support of an existing planning application that we are already engaged with, should be submitted to the LPA so that we can be re-consulted and provide our formal comments when we are able. Please note, it may take time for us to respond to the LPA.</p> <p>We are unable to take on any new work except in the most exceptional of circumstances so for most planning applications will be unable to provide any comments.</p> <p>If it is another specific query, we will respond as soon as we can, but there may be delays in our ability to respond due to significantly increased workload alongside severe staffing shortages.</p>	
<p>RAB</p>	<p>The proposed development would be considered acceptable to St Albans District Council as the Local Planning Authority if the following planning condition is attached to any permission granted:</p> <ul style="list-style-type: none"> i. No development approved by this planning permission shall take place until a detailed surface water drainage scheme has been submitted to, and approved in writing by, the Local Planning Authority. The scheme shall include the utilisation of above ground attenuation and conveyance sustainable drainage techniques (SuDS), with the incorporation of sufficient treatment trains to maintain or improve the existing groundwater quality, as per the Flood Risk Assessment produced by Glanville (dated March 2022) and updated submission information. The scheme shall also include the following: <ul style="list-style-type: none"> a. No development approved by this planning permission shall take place until such time as a detailed drawing demonstrating the management of surface water runoff during events that may temporarily exceed the capacity of the drainage system has been submitted to, and approved in writing by, the Local Planning Authority. b. No development approved by this planning permission shall take place until such time as detailed hydraulic modelling calculations of the proposed surface water drainage scheme that demonstrate there will be no increased risk of flooding as a result of development between the 1 in 1 year return period event and up to the 1 in 100 year return period event (including the correct allowance for climate change) have been submitted to, and approved in writing by, the Local Planning Authority. c. No development approved by this planning permission shall take place until such time as full details of the proposed methods of treating surface water runoff to ensure no risk of pollution is introduced to groundwater both locally and downstream of the site, especially from proposed parking and vehicular areas have been submitted to, and approved in writing by, the Local Planning Authority. Surface water treatment techniques should include both natural SuDS structures and also proprietary devices, such as advanced vortex separators. d. No development approved by this planning permission shall take place until such time as detailed construction drawings of all proposed SuDS features, including details of flow controls and piped network, have been submitted to and approved in writing by the Local Planning Authority. e. No development approved by this planning permission shall take place until such time as detailed construction drawings of the proposed deep bore soakaway structures have been submitted to, and approved in writing by, the Local Planning Authority. f. No development approved by this planning permission shall take place until such time as a management and maintenance plan for the lifetime of the development has been submitted to and approved in writing by the Local Planning Authority. This plan shall include the arrangements for adoption by an appropriate public body or statutory undertaker, management company or maintenance by a Residents' Management Company and/or any other arrangements to secure the operation and maintenance to an approved standard and working condition throughout the lifetime of the development. g. No development approved by this planning permission shall take place until such time as details for the provision of any temporary drainage during construction has been submitted to and approved in writing by the Local Planning Authority. This should include details to demonstrate that during the construction phase measures will be in place to prevent unrestricted discharge, and pollution to the receiving system. h. No development approved by this planning permission shall take place until such time as detailed construction drawings of the proposed foul water drainage network have been submitted to and approved in writing by the Local Planning Authority. <p>Consequently, we advise that the proposed development is considered acceptable to St Albans District Council if the above planning condition is attached to any permission granted.</p>	<p>The Applicants confirm that they are happy to accept a condition on this matter.</p> <p><u>Action:</u> SACDC are to provide the draft condition for the Applicants' review.</p> <p>In the meantime, SACDC can continue to prepare its committee report.</p>

<p>HCC – Herts Ecology</p>	<p>Summary of advice:</p> <ul style="list-style-type: none"> • I have no objection to the principle of development at this site. • Ecological survey reports provide sufficient information for determination. • The development delivers 10% Biodiversity Net Gain (BNG) as demonstrated in the BNG Assessment report. • A Landscape and Ecological Management Plan (LEMP) should be provided at the relevant stage of the planning process. • Revised BNG metric and calculations will be required at the Reserved Matters / Full application stage when landscaping details are known. <p>Some gain can be achieved onsite; however the remaining shortfall of Biodiversity Units (currently 21.4 BU) needs to be secured with an offsite solution. As this cannot be through habitat creation and land management on local land within the applicant's ownership in this instance, the only other option currently available is through a financial contribution to the LPA to go towards a local biodiversity net gain project.</p> <p>If a financial contribution is acceptable to the LPA, this provides the opportunity to deal with the issue. As this is an Outline application, details of final layout and landscaping plans are not yet known; however in principle it is shown that 10% BNG can be delivered onsite and offsite from the development.</p> <p>Any changes to the proposals in the future are likely to require a revised biodiversity metric and follow the national and local policies at that time, and the calculations and figures should reflect these.</p> <p>To conclude, I have no objection to the principle of development at this site if appropriate and sufficient biodiversity mitigation, compensation, enhancement and net gain measures can be addressed and secured at the relevant stages of the planning process.</p>	<p>The Applicants will accept a condition requiring the submission of a LEMP. The Applicants also accept that a financial contribution will also need to be paid. The Applicants are currently considering the 'up to' figures (£) and will advise in due course.</p> <p><u>Action:</u> SACDC are to provide the draft condition for the Applicants' review.</p> <p>In the meantime, SACDC can continue to prepare its committee report.</p>
<p>HCC – Minerals & Waste</p>	<p><u>Minerals response -dated 6th Sept 2022</u></p> <p>After consideration of the submitted Minerals Resource Assessment (MRA) dated 15th August 2022, the County Council, as the Minerals Planning Authority recognises the limitations to prior extraction of the site due to the proximity to residential land and economical viability. Given this, the County Council, as the Minerals Planning Authority, insists that the applicant explores further the opportunistic use of the deposits across the site should permission be granted. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make for sustainable use of these valuable resources.</p> <p>We would now withdraw our earlier objection subject to the recommendation that the following condition be applied, if officers are minded to approve:</p> <p>Condition: <i>Prior to the commencement of development/excavation or ground works in each phase of the development a minerals recovery strategy for the sustainable extraction of minerals shall be submitted to and approved in writing by the Local Planning Authority, in accordance with the submitted Minerals Resource Assessment dated 15 August 2022. Thereafter, the relevant phase or phases of the development must not be carried out other than in accordance with the approved minerals recovery strategy. The minerals recovery strategy must include the following:</i></p> <p><i>a) An evaluation of the opportunities to extract minerals (sand and gravel, hoggin and other soils with engineering properties); and</i></p> <p><i>b) A proposal for maximising the extraction of minerals, providing targets and methods for the recovery and beneficial use of the minerals; and</i></p> <p><i>c) a method to record the quantity of recovered mineral (re-use on site or off-site).</i></p> <p>REASON: <i>In order to prevent mineral sterilisation, contribute to resource efficiency, promote sustainable construction practices and reduce the need to import primary materials in accordance with Policy 5 of the adopted Hertfordshire Minerals Local Plan Review and the National Planning Policy Framework.</i></p> <p><u>Waste response received on 5th July 2022</u></p>	<p>The Applicants confirm that they are happy to accept a condition on this matter.</p> <p><u>Action:</u> SACDC are to provide the draft condition for the Applicants' review.</p> <p>In the meantime, SACDC can continue to prepare its committee report.</p> <p>The Applicants confirm that they are happy to accept a condition on this matter.</p>

	<p>The County Council, as Waste Planning Authority, would expect commitment to producing a SWMP and for the SWMP to be implemented throughout the duration of the project. The SWMP must be prepared prior to commencement of the development and submitted to the Waste Planning Authority for comments.</p> <p>We would request the following condition be attached to any approved planning permission:</p> <p>Condition: No development shall take place until a Site Waste Management Plan (SWMP) for the site has been submitted to and approved in writing by the Local Planning Authority. The SWMP should aim to reduce the amount of waste being produced on site and should contain information including estimated and actual types and amounts of waste removed from the site and where that waste is being taken to. The development shall be carried out in accordance with the approved SWMP.</p> <p>Reason: This is a pre-commencement condition to promote sustainable development and to ensure measures are in place to minimise waste generation and maximise the on-site and off-site reuse and recycling of waste materials, in accordance with Policy 12 of the Hertfordshire Waste Core Strategy and Development management Policies document.</p>	<p><u>Action:</u> SACDC are to provide the draft condition for the Applicants' review.</p> <p>In the meantime, SACDC can continue to prepare its committee report.</p>
<p>HCC - Highways</p>	<p>With respect to the site south of Chiswell Green Lane, I note from the submitted TA that two access points are proposed to serve the northern land parcel, as noted in paragraphs 5.12 and 5.13, reproduced below:</p> <p><i>5.12 "The proposed site access arrangement for the northern parcel is shown within Appendix G and will consist of two priority T-junctions. These junctions will serve the northern half of the residential development and the primary school."</i></p> <p><i>5.13 "These junctions will be formed as priority T-junctions and will incorporate localised widening of the existing carriageway on Chiswell Green Lane to 6.1m to accommodate the additional flows associated with the development. In addition to this, the northern footway will be widened to 2m outside of numbers 46 and 48 Chiswell Green Lane."</i></p> <p>I note that for the above drawing, the western access is situated nearest to the proposed access for the St Stephens Green Farm site. The length of stagger between the two junctions may be considered acceptable.</p> <p>However, I do note that consideration will need to be given in terms of how the planning applications may work together. For example, the St Stephens Green Farm application shows a narrowing opposite the proposed southern site access point. This would mean that the southern site would need to accommodate (within the site curtilage) such an arrangement, although is feasible in principle. We would seek as a preference for the northern site to deliver their proposals, as set out within paragraph 5.21 of the TA.</p> <p><i>5.21 "The design of the proposed access would also incorporate a shared foot / cycleway measuring 3.0-metres in width on the eastern side of the proposed access road. This would connect to a new shared foot / cycleway running in an easterly direction along the full length of the northern side of Chiswell Green Lane and tie into existing infrastructure either side of the double mini-roundabout junction of the B4630 Watford Road / Tippendell Lane."</i></p> <p>The off-site proposals for cycling as presented by the Land south of Chiswell Green Lane site are considered substandard and do not meet the requirements of Local Transport Note 1/20.</p> <p>I wanted to draw these matters to your attention and also place this note on the formal record, applicable to both planning applications. I note that both planning applications are still to be determined. As per the submitted drawings, should the northern site be determined, the off-site highways works would mean that the southern site could not deliver their proposals as they currently stand. However, this notwithstanding, the southern site would need to make changes to their plans in terms of the cycling infrastructure as presently shown. We are in discussion with the southern site about their off-site cycling proposals to align with the northern site's plans for Chiswell Green Lane (and HCC's longer term proposals for the southern end of Watford Road (towards Watford)). Naturally, two major planning applications that include primary accesses in close proximity, and share similar off-site commitments to infrastructure provision will require clear understanding of how, in practice, each development will be implemented both separately and together.</p>	<p>The Applicants met with HCC Highways on 7th July and are discussing the proposals. HCC have requested some amendments. These amendments are included in the Addendum TA now submitted. The parameter plans do not need to be updated.</p> <p><u>Action:</u></p> <p>The Addendum TA explains how the proposed amendments have resolved HCC Highways comments.</p> <p>SACDC can continue to prepare its committee report.</p>
<p>HCC Landscape</p>	<p>The description of the development within the LVIA doesn't refer to the proposed building heights parameters...Confirmation of the building heights assessed by the LVIA is therefore required.</p>	<p>The LVIA was undertaken based on as assessment of the Parameters Plan:</p> <ul style="list-style-type: none"> Access and Movement Parameter Plan REDC01-MCB-ZZ-ZZ-DR-A-0021-DS-P2

	<ul style="list-style-type: none"> • Building Height Parameter Plan REDC01-MCB-ZZ-ZZ-DR-A-0022-DS-P2 • Land Use Parameter Plan REDC01-MCB-ZZ-ZZ-DR-A-0023-DS-P2 <p>The assessment of effects at Year 1 reflects the proposed building heights set out on the Building Height Parameter Plan.</p> <p>No further action is required from the Applicants.</p>
The LVIA doesn't appear to provide any assessment of the school site...[and] there doesn't appear to be any reference to testing potential options for the location of the school site within the overall development area.	<p>The school is explicitly referenced in the description of the proposed development, and identified on the Parameters Plan, although not explicitly mentioned in the commentary for each of the landscape and visual receptors. The LVIA is based on the Parameters Plans, in particular the Building Height Parameter Plan, which sets out the extent of the development parcels and the height. The school development parcel is identified as being at a maximum height of 15.5m.</p> <p>The Illustrative Masterplan and Landscape Strategy do not show the proposals for a school in any more illustrative detail, as the proposals for a school would be brought forward by others through a reserved matter application (RMA) and has therefore been assessed generically, based on precedent proposals which have been consented in the locality.</p> <p>The proposals for a school will be the subject of a separate RMA and will be required to conform with the Parameters Plans: the location, scale, massing, and design can therefore be considered again through the RMA stage.</p> <p>Table 8.1: Summary of Landscape and Visual Effects includes the assessment of a school on the Site, in accordance with the Building Height Plan Parameter Plan. Proving the school comes forward in conformity with the Parameter Plans, the landscape and visual effects should be no greater than set out in the LVIA.</p> <p>No further action is required from the Applicants.</p>
Despite [some] concern[s], the conclusions of the landscape assessment is broadly supported, providing that effective mitigation is delivered...[However,] the planting shown along [the western] edge is very poor and is not considered sufficient. A much more robust landscape response is therefore required along the western edge of the site.	<p>The existing vegetative buffer along the western site boundary is proposed to be reinforced to a minimum width of 5m, tying into the width of the existing boundary vegetation which in some places is substantially wider. This is secured in the Land Use Parameter Plan.</p> <p>It is noted that there are also landscape features (trees and landscape bunds) located outside of the site that will also help to create a larger landscape buffer.</p> <p>No further action is required from the Applicants.</p>
At the pre-application stage it was suggested that photomontages should be provided to illustrate proposed views, however none have been provided.	<p>An LVIA Clarification Note with the relevant verified wireline has been submitted. A Verified Wireline has been created, due to the outline nature of the Planning Application and Proposed Development. The verified wireline has been created based on the Building Height Parameter Plan, and therefore accounts for a school building of up to 15.5m anywhere within the area of the Site identified for a school. (See Page 7).</p> <p>No further action is required from the Applicants.</p>
[The] approach [in the Landscape Opportunities and Constraints Plan] to densities is not reflected in the emerging masterplan that appears to be of a relatively consistent density throughout.	<p>The approach to densities for each phase of the development would be addressed at the Reserved Matters stage.</p> <p>No further action is required from the Applicants.</p>
The proposal to provide a new north to south pedestrian/cycle route is welcomed, however it is not clear how it branches out into each of the four sub-development areas to provide maximum permeability and priority for pedestrians and cyclists.	<p>The outline application refers to the Parameters Plans and an Illustrative Masterplan. The details requested would be addressed at Reserved Matters stage.</p> <p>No further action is required from the Applicants.</p>
[In the Landscape Framework Plan and Landscape Structure Plan in the DAS] there does not appear to be any meaningful green infrastructure (GI) networks permeating throughout each of the sub-development blocks...There needs to be a much greater balance of structural planting within the public realm and the streetscene, that is not at risk of removal by residents.	<p>The outline application refers to the Parameters Plans and an 'Illustrative' Masterplan. The details requested within the development parcels would be addressed at Reserved Matters stage.</p> <p>No further action is required from the Applicants.</p>
The principle public open spaces, appear to be dominated by SuDS attenuation/retention features.	<p>The outline application refers to the Parameters Plans and an 'Illustrative' Masterplan. The preparation of a detailed refined masterplan would be prepared at the Reserved Matters stage. These comments can be addressed at the Reserved Matters stage.</p>

	<p>The 'community amenity area'...is physically and visually isolated and could be subject to anti-social behaviour, raising issues of security.</p> <p>The [community play] area is enclosed by highways, and there is concern for the potential conflict between people and vehicles crossing the space...This area is not positively fronted or well-overlooked and therefore lacks passive surveillance and security.</p> <p>It is not clear where [the proposed orchards] or the food production areas are.</p>	<p>No further action is required from the Applicants.</p> <p>The outline application refers to the Parameters Plans and an 'Illustrative' Masterplan. The details requested would be addressed at Reserved Matters stage.</p> <p>No further action is required from the Applicants.</p> <p>The outline application refers to the Parameters Plans and an 'Illustrative' Masterplan. The preparation of a detailed refined masterplan would be prepared at the Reserved Matters stage. These comments can be addressed at the Reserved Matters stage.</p> <p>No further action is required from the Applicants.</p> <p>The outline application refers to the Parameters Plans and an 'Illustrative' Masterplan. The preparation of a detailed refined masterplan would be prepared at the Reserved Matters stage. These comments can be addressed at the Reserved Matters stage.</p> <p>No further action is required from the Applicants.</p>
<p>HCC Public Health Department</p>	<p>Public Health notes that the developer consulted the Public Health team at Hertfordshire County Council at the stage of an EIA Scoping Opinion (October 2021). It is positive to see the developer has submitted an HIA (August 2022).</p> <p>After completing a quality assurance review of the submitted HIA, several areas have been identified where the HIA could be strengthened which the developer should address (please refer to Annex 1). Until the areas listed in Annex 1 are addressed, Public Health cannot be satisfied that these issues have been considered robustly as part of the application. Public Health, therefore, would like to recommend for the planning authority to consider for the developer to address the areas identified by Public Health in Annex 1.</p> <p>Reason: To ensure that the impacts on health and wellbeing, both positive and adverse are adequately identified as a result of the proposed development and to demonstrate that the proposed development contributes to reducing the causes of ill-health, improving health and reducing health inequalities within the district.</p> <p>Annex 1 HIA Quality Assurance:</p> <p><u>Strengths</u></p> <ul style="list-style-type: none"> • WHO definition of health has been used • The HIA has considered the health of the existing population of the surrounding areas • Provides a description of the proposed development. • Good to see public health profiles data for St Albans on, child and adult health. • Good information provided on transport, education and open space and recreation, but more data is needed on wider determinants such as unemployment rates, air quality and crime in the area. • Comprehensive section on links to Local policies and strategies • Have acknowledged the positive and neutral impacts of the development, but limited recommendations mitigations or enhances actions have been identified for this impacts. • National policy context is given but it is limited to NPPF only. <p><u>Weaknesses</u></p> <ul style="list-style-type: none"> • No attempt has been made to use the Wales Health Impact Assessment Support Unit (WHIASU) HIA methodology as specified in the Herts County Council HIA Position Statement (2019). • The rapid health impact assessment used does not provide a comprehensive assessment of the potential health impacts. It does not include: the Wider Determinants of Health, such as build environment (noise, air quality, road hazards). • A description of how the quantitative evidence was gathered and analysed were not given and its relevance to the HIA was not justified. • HIA has not identified all the potential vulnerable population groups. • The methodology has not attempted to determine the criteria for sensitivity, magnitude and the significance of effects. • No constraints or limitations in preparing the HIA have been explained. • The assessment does not consider the severity of impact/exposure (intensity, reversibility and impact on vulnerable population groups), the impact magnitude (number of people affected and duration of impact/exposure). • The report does not identify and justify the use of any standards and thresholds used to assess the significance of health impacts. 	<p>The Applicants have taken into account these comments and hereby submit an Addendum HIA which addresses these comments.</p> <p>No further action is required from the Applicants.</p>

	<ul style="list-style-type: none"> HIA has not included a literature review. No cumulative effects of other committed/proposed developments have been identified. Health impacts for the occupants of the proposed development have not been considered. Expertise of the assessor has not been stated in the HIA. To ensure the completeness and quality of the Health Impact Assessment: (a) the developer must ensure that the Health Impact Assessment is prepared by competent experts; and (b) the Health Impact Assessment must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts. There is no clear explanation of the roles and responsibilities in the HIA and the organisations they represent. 	
HCC Spatial Planning & Economy Unit	No response received	N/A
HCC - Water	No response received	N/A
SACDC – Design & Conservation	No response received	N/A
SACDC – Head of Community Services	No response received	N/A
SACDC – Environmental & Reg Services	<p>We have reviewed the CASS ALLEN Noise Assessment RP01-21618-R2 and at this stage would suggest the following conditions in relation to noise, should this application be minded for approval.</p> <p>Condition: Further noise assessment is required at the detailed design stage to demonstrate compliance with BS8233.</p> <p>Reason: To protect the amenities of adjoining development. To comply with Policy 70 of the St. Albans District Local Plan Review 1994.</p> <p>Condition: CASS ALLEN advice in Noise Assessment RP01-21618-R2, which reviews the development design in relation to measured noise levels, provides for potential acoustic design improvements which shall be followed and extended where appropriate to Chiswell Green Lane (North Eastern edge of site) along with Miriam Lane (Western edge of site):</p> <ol style="list-style-type: none"> 1. Configure the internal layouts of the units to minimise habitable rooms overlooking Chiswell Green Lane (North Eastern edge of site) & Miriam Lane (Western edge of site) 2. Acoustically attenuate the facades overlooking the road in these areas to reduce noise levels in habitable rooms. 3. Minimise maximum noise levels in gardens on the North Eastern & Western edge by acoustically screening them from the road with suitable acoustic fencing (close boarded 1.8m high). <p>Reason: To protect the amenities of adjoining development. To comply with Policy 70 of the St. Albans District Local Plan Review 1994.</p> <p>Condition: Sound insulation measures shall be incorporated into the design of the proposed development so that the indoor ambient noise criteria described in BS8233:2014 are achieved within all habitable rooms.</p> <p>Reason: To protect the amenities of adjoining development. To comply with Policy 70 of the St. Albans District Local Plan Review 1994.</p> <p>Condition: A full overheating assessment and specification of suitable glazing and ventilation systems to achieve acceptable internal noise levels with windows open (as per ProPG guidance) will be provided at detailed design stage.</p> <p>Reason: To protect the amenities of adjoining development. To comply with Policy 70 of the St. Albans District Local Plan Review 1994. BS4142: 2014 assessment – Plant and Machinery</p> <p>Condition: Before the use commences a noise assessment should be carried out in accordance with BS4142: 2014 Methods for rating and assessing industrial and commercial sound to establish whether the (plant/machinery/specify) that are to be installed or operated in connection with carrying out this permission are likely to give rise to complaints at any adjoining or nearby noise sensitive premises. All plant, machinery and equipment installed or operated in connection with the carrying out of this permission shall be so enclosed and/or attenuated that noise from the (plant/machinery/specify) does not, at any time, increase the ambient equivalent continuous noise level. The rating level of any plant/machinery/equipment to be used shall not exceed the background sound level.</p>	<p>The Applicants confirm that they are happy to accept a condition on this matter.</p> <p><u>Actions:</u> SACDC to confirm the exact wording of the condition [The Applicants are broadly happy with the condition suggested].</p> <p>In the meantime, SACDC can continue to prepare its committee report.</p>

	<p>Reason: To protect the amenities of adjoining development. To comply with Policy 70 of the St. Albans District Local Plan Review 1994.</p>	
SACDC – Archaeology	<p>Archaeological Recommendation: Archaeological evaluation and follow on excavation:</p> <p>1. Archaeological evaluation and archaeological excavation</p> <p>No development-related works shall take place within the site until an agreed programme defined by a written scheme of archaeological work (WSI) has been submitted to and approved in writing by the Local Planning Authority. This scheme shall include a programme of archaeological evaluation by trial trenching, followed by open area excavation on those areas containing archaeological deposits required, and off-site work such as the analysis, publication, and archiving of the results, together with a timetable for completion of each element. All works shall be carried out and completed in accordance with the approved scheme, unless otherwise agreed in writing by the Local Planning Authority. This must be carried out by a professional archaeological organisation.</p> <p>Reason: To ensure adequate opportunity is provided for archaeological research on this historically important site. To comply with Policy 111 of the St Albans District Local Plan Review 1994 and the National Planning Policy Framework. To ensure the appropriate identification, recording and publication of archaeological and historic remains affected by the development.</p> <p>2. Publication and Dissemination</p> <p>Following the completion of the fieldwork and the post-excavation assessment in Condition 1, appropriate resources will be agreed with the Local Planning Authority for the post-excavation project generated by the archaeological WSI in Condition 1. This will include all necessary works up to and including an appropriate publication and archiving and will include an agreed timetable and location for that publication.</p> <p>Reason: To ensure adequate opportunity is provided for archaeological research on this historically important site. To comply with the National Planning Policy Framework. To ensure the appropriate publication of archaeological and historic remains affected by the development. This is advice is in line with paragraph 205 of the NPPF (2021).</p>	<p>The Applicants confirm that they are happy to accept a condition on this matter.</p> <p><u>Actions:</u> SACDC to confirm the exact wording of the condition [The Applicants are broadly happy with the condition suggested].</p> <p>In the meantime, SACDC can continue to prepare its committee report.</p>
SACDC - Trees	<p>Observations: - The arboricultural tree survey identifies two trees for removal that are subject to a TPO, T5 and G1 on TPO 1348 (T55 on the RPA plans and G8).</p> <p>T5 is a category B tree and G1 is category C.</p> <p>In total 9 trees are proposed for removal and removal/part removal of 5 groups, there are no objections to the removal of these trees to facilitate the current masterplan dwg No REDC01-MCB-ZZ-ZZ-DR-A-0210-D5-P2 dated 27/04/2022.</p> <p>Any revisions to the masterplan which impact upon further removal of trees will need to be considered against the arboricultural survey.</p> <p>The adoption of no-dig construction for the footpaths through the RPA of retained trees is acceptable, this details needs to be forthcoming once the masterplan is approved and can form part of the landscaping details across the site.</p> <p>Landscaping of this development will be commented on by HCC.</p>	<p>The Applicants confirm that they are happy to accept a condition relating to RPZs.</p> <p><u>Actions:</u> SACDC is to confirm the exact wording of the condition.</p> <p>In the meantime, SACDC can continue to prepare its committee report.</p>
SACDC – Housing	<p>As this is a policy compliant scheme. I have no comments on the proposed accommodation split outlined below but would welcome any further discussions on the affordable housing delivery on this site regarding tenure, nominations rights and management.</p>	<p>The Applicants do not consider it necessary to response to this comment.</p> <p><u>Action:</u> SACDC to confirm the exact wording to be included in the S106 Agreement relating to affordable housing tenure, nomination rights and management.</p> <p>In the meantime, SACDC can continue to prepare its committee report.</p>
SACDC - Parking	No response received	N/A

SACDC – Spatial Planning

It is considered clear that a number of significant harms and significant benefits would result from this proposed development. A recent appeal decision in the District allowing permission for residential development in the Green Belt is also significant. The SKM Green Belt Review considered that overall parcel GB 25 does significantly contribute to safeguarding the countryside and maintaining the existing settlement pattern, in addition to making a partial contribution towards preventing merging and preserving setting. It does, however, note that part of the parcel does have urban fringe characteristics.

The site was also taken forward as part of the withdrawn Local Plan – West of Chiswell Green Broad Location.

It is also clear that there is no 5 year land supply and that substantial weight should be given to the delivery of housing. It also clear that there is a need for affordable housing and substantial weight should be given to delivery of affordable housing.

This note is focussed on key policy evidence and issues but recognises that considerable other evidence is relevant. In totality it is considered that this recommendation is neutral.

The Applicants welcome this 'neutral' response. VSC do exist in this case to justify the proposals for the reasons explained in the Planning Statement and Design & Access Statement.

No further action is required by the Applicants or SACDC.

SACDC Infrastructure

The following table provides a summary of the planning obligations that the Council considers it appropriate to request because of the need generated by the proposed development:

Type of Provision	(A) Local Standard of Provision	(B) Cost per square metre	(C) Contribution Per Person	(D) Total Contribution	Project to Which Contribution Will Be Applied
Play Areas	600 m ² per 1000 population (see note 1)	£213 per square metre (see note 2)	£127.80 (excluding 1 beds)	£0	
Parks and Open Spaces	12,000 m ² per 1000 population (see note 3)	£17 per square metre (see note 4)	£204	£0	
Leisure & Cultural Centres	82.58 m ² per 1000 population (see note 5)	£3,908 per square metre (see note 6)	£322.72	£298,355	Greenwood Park Community Centre & Pavilion
Total = £298,355					

Formula is: (A x B) / 1000 = C x Occupancy = D

Note:

1. This figure is based on the Councils Green Spaces Strategy 2016 (section 6, pg105 point 6.2).
2. This figure is based on the development of play areas at Fleetville Recreation Ground (2014) and Cotlandswick Leisure Centre (2015), which were subject to a tender process to achieve best value. Both play areas are 22m x 16m and were built at a cost of £75,000.
3. This figure is based on the Councils Green Spaces Strategy 2016 (section 6, pg105 point 6.2).
4. This figure is based on a landscaping project at London Rd Open Space of 1,169 m², at a cost of £20,000, having obtained three quotes.
5. This figure is based on the Councils Sport & Recreation Facilities Strategy (page 133, section 9, point 9.25).
6. This figure is based on the re-development of Westminster Lodge Leisure Centre in 2012. The centre is 4862sqm in size and cost £19million to build under a tender process.

The £0 'Play Areas' and 'Parks and Open Spaces' contribution requests are agreed by the Applicants.

In terms of the 'Leisure and Cultural Centres' contribution request towards Greenwood Park Community Centre & Pavilion, the Applicants agree to the HOTs. The Applicants are currently considering the 'up to' figures (£) and will advise in due course.

Actions:

Legal Agreement to be drafted and agreed.

In the meantime, SACDC can continue to prepare its committee report.

**Herts & Middlesex
Wildlife Trust**

The site is currently predicted to result in a net loss of 29.39% or 15.97 habitat units. To comply with policy and deliver a biodiversity net gain it must provide a minimum of 21.4 habitat units offsite. This must be sufficient to satisfy the trading rules of the metric and take account of the existing value of the offsite habitat. I have attached an updated biodiversity metric which shows the current situation and what is required by way of offsite compensation – I have populated the offsite habitat tabs to demonstrate what this looks like.

In accordance with the example provided it will require 4.6 hectares of poor condition modified grassland to be converted to 4.1 hectares of other neutral grassland in moderate condition, with an additional 0.5 hectares of scrub. Without an undertaking that this offset must be provided or sourced by the applicant this application is not compliant with policy and cannot be approved. This leaves 2 options.

1. A condition should be applied to the decision that states that no development works can start until details of a legitimate biodiversity offset has been supplied by the applicant and approved by the LPA, that delivers a minimum of 21.4 habitat units of uplift and satisfies the trading rules of the metric. The offset must be fully described with an offset management plan and include existing habitat survey, uplift required to satisfy metric, establishment methodology including species mixes, management strategy, monitoring strategy, contingency strategy, persons responsible for implementing the plan, which should cover a period of at least 30 years.
2. The alternative solution is for the LPA to take on the responsibility for delivering the offset on behalf of the developer. This would involve the developer providing a commuted sum and agreement to create the 21.4 habitat units of uplift. This is a considerable undertaking. The LPA will need to be certain that they have the capacity to do this because if it is not delivered, the proposal will not result in a net gain and will not be compliant with policy. It will need the land or have access to land that can host this substantial offset. The sum that should be negotiated must be enough to create and maintain the habitat for a minimum of 30 years, including contingency if it goes wrong and administration to make sure annual implementation and monitoring of the plan takes place. The Herts biodiversity offset cost calculator has been developed from the Warwickshire calculator to enable a reasonable sum to deliver this offset to be estimated. The estimated cost to create 21.4 habitat units of uplift which satisfies the trading rules from poor quality modified grassland (such as amenity grassland typical of LPA amenity land) is provided below:

This comes to a total of £438,956. But I stress, the LPA must have the land and resources to deliver this or it should not grant planning permission. In short it needs 4.6 hectares of amenity grassland which can be converted into a wildflower meadow with edges of scrub, and the personnel to administer this fund and deliver the work for a minimum of 30 years.

In addition to the offsite net gain situation, the onsite habitat units should be secured by condition and with a biodiversity net gain plan. This is required to deliver the 38.37 habitat units detailed in the metric. A suitable condition is:

Condition

'Development shall not commence until an onsite biodiversity net gain plan has been submitted to, and approved in writing by, the local planning authority. The content of the BNGP shall ensure the delivery of the agreed number of habitat units identified in the NE biodiversity metric as a minimum (38.37 habitat units and 9.14 hedgerow units) to achieve the stated number of habitat units on the development site. The BNGP must include the following:

- a) Description and evaluation of features to be managed.*
- b) Aims and objectives of management.*
- c) Appropriate management options for achieving target condition for all habitats as described in the approved metric.*
- d) Definitive prescriptions for management actions. Actions for habitats must be cross referenced to the appropriate line in the metric.*
- e) Preparation of a rolling 5 year annual work schedule for all habitats, to be implemented in perpetuity, clearly marked on plans.*
- f) Details of the body or organisation responsible for implementation of the plan.*
- g) Ongoing monitoring plan and remedial measures to ensure habitat condition targets in the approved metric are met.*
- h) Details of species and species mixes selected to achieve target habitats, as identified in approved metric, definitively stated and marked on plans.*

The BNGP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery.

The Applicants will accept the need for these conditions. The Applicants also accept that a financial contribution will also need to be paid. The Applicants are currently considering the 'up to' figures (£), will undertake discussions with Herts Ecology / SACDC and then advise in due course on the appropriate response.

Action:

SACDC are to provide the draft condition for the Applicants' review.

In the meantime, SACDC can continue to prepare its committee report.

	<p><i>The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the BNGP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme for its duration.'</i></p> <p><i>Reason: To achieve a measurable biodiversity net gain in accordance with NPPF.</i></p> <p>In addition the ecological report has undertaken to provide integrated bat and bird boxes plus hedgehog highways in the development. This should be secured by condition. A suitable condition is:</p> <p><i>'Development shall not commence until details of the model, and location of 75 integrated bat boxes and 100 integrated swift boxes has been supplied to and approved by the LPA. These should be incorporated into the brickwork of the building, placed as high as possible and orientated predominantly to the south for bats and north for swifts. All gardens must be connected by hedgehog highways. These should be fully described and marked on maps. They shall be fully installed prior to occupation and retained as such thereafter'.</i></p> <p><i>Reason: To conserve and enhance biodiversity in accordance with NPPF</i></p>													
<p>Herts Valley CCG</p>	<p>As stated above, the closest practice to the proposed development is the Midway Surgery. The size of their current building is 524m2 and their patient list as of 1 April 2022 was 13,237.</p> <p>Department of Health's Principles of Best Practice stipulate that a surgery with 13,000 patients is recommended to have approx. 820 m2 NIA (net internal area) of floor space, which is circa 300m2 more than this practice currently occupies, therefore demonstrating significant constraint. It should be noted that the Principles of Best Practice is only concerned with the GP core services and does not provide size guidance for extended services, which most surgeries are offering and the volume of which is set to increase as explained above.</p> <p>It is possible to extend the building in order to cope with an increase in patient population and the practice is currently working up an outline proposal.</p> <p>For this reason a contribution would be sought to make this scheme favourable to the NHS services commissioner and we would like to propose that a charge is applied per dwelling towards providing additional primary care capacity in the area, potentially at the Midway Surgery.</p> <p>391 dwellings x 2.4= 938 new patients 938/ 2,000 = 0.469 GP (based on ratio of 2,000 patients per 1 GP and 199m2 as set out in the NHS England "Premises Principles of Best Practice Part 1 Procurement & Development") 0.469 x 199m2 = 93.331 m2 additional space required 93.331 x £5,410 (build costs including land, fit out and fees) = £504,920.71 £504,920.71 / 391 = £1,291.91 ~ £1,290 per dwelling</p> <p>The formula is based on the number of units proposed and therefore related in scale, not taking into account any existing deficiencies or shortfalls.</p>	<p>The Applicants agree to the HOT. The Applicants are currently considering the 'up to' figures (£) and will advise in due course.</p> <p><u>Actions:</u></p> <p>The Applicants requested SACDC to seek confirmation of this amount from HV CCG in light of the surplus capacity at Brickett Wood Survey (email to George Burgess on 10th Aug 2022).</p> <p>GB confirmed on 30th Aug that he had asked the CCG to respond.</p> <p>Legal Agreement to be drafted and agreed by the Applicants or SACDC</p> <p>In the meantime, SACDC can continue to prepare its committee report.</p>												
<p>East of England Ambulance Service</p>	<p>3.2 EEAST are in a unique position that intersects health, transport and community safety and does not have capacity to accommodate the additional growth resulting from the proposed developments combined with other developments in the vicinity. This development is likely to increase demand upon existing constrained ambulance services and blue light response times.</p> <p>3.3 Table 1 shows the population likely to be generated from the proposed development. The capital required to create additional ambulance services to support the population arising from the proposed development is calculated to be £95,013.</p> <p>Table 1 Capital Cost calculation of additional health services arising from the development proposal</p> <table border="1" data-bbox="587 1654 1308 1745"> <thead> <tr> <th>Additional Population Growth</th> <th>Rate²</th> <th>Ambulance Cost³</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>391 (dwellings)¹ including 40% affordable and 5 self-build</td> <td></td> <td></td> <td></td> </tr> <tr> <td>938</td> <td>0.15</td> <td>£675</td> <td>£95,013</td> </tr> </tbody> </table> <p>1 Calculated assuming 2.4 persons for each dwelling average household 2011 Census: Rooms, bedrooms and central heating, local authorities in England and Wales (rounded to the nearest whole number) 2 Calculated using per head of population in Hertfordshire and West Essex 1996 of 1.4m and emergency activity volume in 2018/19 (203,066) 3 Calculated from EEAST ambulance data</p>	Additional Population Growth	Rate ²	Ambulance Cost ³	Total	391 (dwellings) ¹ including 40% affordable and 5 self-build				938	0.15	£675	£95,013	<p>The Applicants agree to the HOT. The Applicants are currently considering the 'up to' figures (£) and will advise in due course.</p> <p><u>Actions:</u></p> <p>Legal Agreement to be drafted and agreed by the Applicants or SACDC</p> <p>In the meantime, SACDC can continue to prepare its committee report.</p>
Additional Population Growth	Rate ²	Ambulance Cost ³	Total											
391 (dwellings) ¹ including 40% affordable and 5 self-build														
938	0.15	£675	£95,013											
<p>National Highways</p>	<p>Referring to the consultation on a planning application dated referenced above, in the vicinity of the A414/M25 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:</p>	<p>The Applicant's note that this is the 2nd holding response from NH (until 16th Sept 2022).</p> <p><u>Action:</u></p>												

	<p>c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);</p> <p>The site is being promoted through the current St Albans City and District Local Plan Review which has been a protracted review period. The site lies between the A414/M1/M25. The A414/North Orbital Road/ Watling Street Roundabout is of particular interest. National Highways have begun discussions with Glanville, having completed a review of the TA, who are considering our Technical Note at present. Therefore, we request that the application is not determined before 16th September 2022 to allow the discussions to conclude. If we are in a position to respond earlier than this, we will withdraw this recommendation accordingly.</p>	<p>The Applicants are currently undertaking discussions with NH and will update SACDC in due course.</p>
<p>Environment Agency</p>	<p>The site is situated in a vulnerable groundwater area within Source Protection Zone 2 and a principal aquifer. These proposals need to be dealt with in a way which protects the underlying groundwater. Please therefore take note of the following advice.</p> <p>Where land contamination may be an issue for a prospective development, we encourage developers to employ specialist consultants/contractors working under the National Quality Mark Scheme.</p> <p>We recommend that the requirements of the National Planning Policy Framework and National Planning Policy Guidance are followed. This means that all risks to groundwater and surface waters from contamination need to be identified so that appropriate remedial action can be taken. We expect reports and Risk Assessments to be prepared in line with our Approach to Groundwater protection (commonly referred to as GP3) and the updated guide Land contamination: risk management (LCRM). LCRM is an update to the Model procedures for the management of land contamination (CLR11), which was archived in 2016.</p> <p>In order to protect groundwater quality from further deterioration:</p> <ul style="list-style-type: none"> • No infiltration based sustainable drainage systems should be constructed on land affected by contamination as contaminants can remobilise and cause groundwater pollution (e.g., soakaways act as preferential pathways for contaminants to migrate to groundwater and cause pollution). • Piling or any other foundation designs using penetrative methods should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution. <p>The applicant should refer to the following (non-exhaustive) list of sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the groundwater beneath the site:</p> <ol style="list-style-type: none"> 1. Follow the risk management framework provided in the updated guide LCRM, when dealing with land affected by contamination. 2. Refer to the Environment Agency Guiding principles for land contamination for the type of information we require in order to assess risks to controlled waters from the site. The Local Planning Authority can advise on risk to other receptors, such as human health. 3. Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed. The Planning Practice Guidance defines a "Competent Person" (to prepare site investigation information) as: "A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation." For this definition and more please see here. 4. Refer to the contaminated land pages on Gov.uk for more information. 5. We expect the site investigations to be carried out in accordance with best practice guidance for site investigations on land affected by contamination e.g., British Standards when investigating potentially contaminated sites and groundwater, and references with these documents and their subsequent updates: <ul style="list-style-type: none"> • BS5930:2015 Code of practice for site investigations; • BS 10175:2011+A2:2017 Code of practice for investigation of potentially contaminated sites; • BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points; • BS ISO 5667-11:2009, BS 6068- 6.11: 2009 Water quality. Sampling. Guidance on sampling of groundwaters (a minimum of 3 groundwater monitoring boreholes are required to establish the groundwater levels, flow patterns but more may be required to establish the conceptual site model and groundwater quality. See RTM 2006 and MNA guidance for further details); • BS ISO 18512:2007 Soil Quality. Guidance on long-term and short-term storage of soil samples; • BS EN ISO 5667:3- 2018. Water quality. Sampling. Preservation and handling of water samples; • Use MCERTS accredited methods for testing contaminated soils at the site; 	<p>The Applicants note that the EA is not objecting to the proposals. They are advising that groundwater quality needs to be protected where infiltration and/or piling is proposed in contaminated ground.</p> <p>The site investigation for the southern part of the site did not identify any unacceptable contamination. Therefore there is low risk for the northern part of the site.</p> <p>The Applicants know the site is located within a Source Protection Zone so have designed a robust surface water drainage strategy, in accordance with the Environment Agency's Approach to Groundwater Protection guidance, version 1.2 (February 2018), by providing a suitable SuDS management train that will deliver effective contaminant removal from runoff before discharging into the chalk bedrock.</p> <p><u>Action:</u></p> <p>No further action is required by the Applicants or SACDC. That said, the Applicant's expect SACDC to apply a contamination investigation related condition to be applied to any decision notice. SACDC is to confirm the exact wording of the condition for the Applicants' review.</p> <p>In the meantime, SACDC can continue to prepare its committee report.</p>

	<ul style="list-style-type: none"> • Guidance on the design and installation of groundwater quality monitoring points Environment Agency 2006 Science Report SC020093 NB. The screen should be located such that at least part of the screen remains within the saturated zone during the period of monitoring, given the likely annual fluctuation in the water table. In layered aquifer systems, the response zone should be of an appropriate length to prevent connection between different aquifer layers within the system. <p>Final comments Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.</p>	
Natural England	Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.	<p>The Applicants welcome this response.</p> <p>No further action is required by the Applicants or SACDC.</p>
Crime Prevention (Herts Constabulary)	<p>Thank you for sight of this outline application, on which I comment from a crime prevention perspective only. I have read the supplied documentation and I know the area well.</p> <p>Whilst I would have no major concerns with the intention to build substantial housing at this location, I did comment at an earlier stage regarding the need for security to be taken seriously and some form of commitment made in this respect.</p> <p>This was all the more important given the knowledge of neighbouring proposals that will have a cumulative effect in this area making the need security even more necessary.</p> <p>I did stipulate that if this application does go forward, I would certainly be looking for assurances around security in general and Secured by Design (SBD) in particular, and any support given would be very much dependent on this serious matter being given the detail it needs and deserves.</p> <p>It is therefore very reassuring to see the following statement within supplied Design and Access Statement supplied-</p> <p>5.7 SECURED BY DESIGN Following discussions with the Hertfordshire Constabulary Principle Crime Prevention Design Advisor, it is intended that the scheme will be designed to comply with the requirements of 'Secured By Design' and that certification would be applied for as part of the detailed design stage. A number of key principles are outlined below:</p> <p>ACCESS & MOVEMENT The illustrative layout has a simple movement framework that allows for direct, well-lit access to all units for both pedestrians and vehicles. Segregation of routes has been avoided, as have alleyways and short cuts. Rear access to plots will have lockable gates enclosed by 1.8 m fence or masonry walls. The development is proposing to utilize shared surfaces in part to enable the residents to take possession of both footpath and roadway. This method will engender a sense of guardianship over the streets by local residents.</p> <p>STRUCTURE All properties throughout the development will front a defined access route. The number of sides fronting the public realm is reduced and assists in creating 'active frontages' which promote natural surveillance.</p> <p>SURVEILLANCE As previously described the movement framework of the development allows for good natural surveillance. Every opportunity will be taken to avoid 'inactive frontages'. The well defined routes reduce areas for potential criminal activity. Any criminal activity would attract attention, and with many overlooking properties and an established sense of guardianship action is more likely to be taken. Car parking is located in areas under natural surveillance from adjoining properties.</p> <p>OWNERSHIP We envisage that the development as designed will promote a sense of ownership, respect, territorial responsibility and community. By designing clearly defined public, semi-private and private spaces we wish to encourage residents and users to generate a sense of ownership and responsibility for their properties and the development as a whole.</p>	<p>The Applicants welcome this response.</p> <p><u>Action:</u> SACDC is to confirm the exact wording of the relevant Secured by Design accreditation condition for the Applicants' review.</p> <p>In the meantime, SACDC can continue to prepare its committee report.</p>

	<p>I would therefore ask that Secured by Design accreditation be a condition of any future approval.</p> <p>Based on this I would be able to give this application my full support in the knowledge that security will be designed in from the very beginning to the benefit of all future occupants of the new homes.</p>	
<p>Thames Water</p>	<p><u>Waste Comments</u></p> <p>Following initial investigations, Thames Water has identified an inability of the existing FOUL WATER network infrastructure to accommodate the needs of this development proposal. Thames Water has contacted the developer in an attempt to agree a position for foul water networks but has been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission.</p> <p><i>"The development shall not be occupied until confirmation has been provided that either:-</i></p> <ol style="list-style-type: none"> <i>1. All foul water network upgrades required to accommodate the additional flows from the development have been completed; or-</i> <i>2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan."</i> <p><i>Reason - Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning.</i></p> <p><i>Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval."</i></p> <p>The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.</p> <p>There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.</p>	<p>The Applicants submitted a pre-planning enquiry in 2020 to Thames Water in respect of foul capacity for the southern half of the site. Thames Water's response in March 2020 confirmed that there was capacity in the public sewerage network to accommodate foul flows from a residential development of only 190 dwellings with flows split between two Thames Water manholes in Forge End and Long Fallow.</p> <p>Our Foul Drainage & Utilities Assessment report notes at paragraph 4.9 that Thames Water, as local sewerage undertaker, is obliged to accept foul water flows generated by development and fund any network improvements that may be required to provide the necessary capacity via infrastructure charges payable by the developer. As such, foul capacity will not be a constraint to development, although the timing of any network improvements may ultimately influence the development programme.</p> <p>Therefore, Thames Water's comments are as expected and the suggested condition is acceptable.</p> <p><u>Actions:</u> SACDC to confirm the exact wording of the foul water condition [The Applicants are broadly happy with the condition suggested].</p> <p>In the meantime, SACDC can continue to prepare its committee report.</p>
<p>Affinity Water</p>	<p><u>Water quality</u></p> <p>You should be aware that the proposed development site is located within an Environment Agency defined groundwater Source Protection Zone (SPZ) corresponding to our Pumping Station (BRIC). This is a public water supply, comprising a number of abstraction boreholes, operated by Affinity Water Ltd.</p> <p>The construction works and operation of the proposed development site should be done in accordance with the relevant British Standards and Best Management Practices, thereby significantly reducing the groundwater pollution risk. It should be noted that the construction works may exacerbate any existing pollution. If any pollution is found at the site then the appropriate monitoring and remediation methods will need to be undertaken.</p> <p>Any works involving excavations below the chalk groundwater table (for example, piling or the implementation of a geothermal open/closed loop system) should be avoided. If these are necessary, a ground investigation should first be carried out to identify appropriate techniques and to avoid displacing any shallow contamination to a greater depth, which could impact the chalk aquifer.</p> <p>For further information we refer you to CIRIA Publication C532 "Control of water pollution from construction - guidance for consultants and contractors".</p> <p><u>Water efficiency</u></p>	<p>Therefore, Thames Water's comments are as expected and the suggestion for ground investigation condition is acceptable.</p> <p><u>Actions:</u> SACDC to confirm the exact wording of the ground investigation condition for the Applicants' review.</p> <p>In the meantime, SACDC can continue to prepare its committee report.</p>

	<p>Being within a water stressed area, we expect that the development includes water efficient fixtures and fittings. Measures such as rainwater harvesting and grey water recycling help the environment by reducing pressure for abstractions. They also minimise potable water use by reducing the amount of potable water used for washing, cleaning and watering gardens. This in turn reduces the carbon emissions associated with treating this water to a standard suitable for drinking and will help in our efforts to get emissions down in the borough.</p> <p><u>Infrastructure connections and diversions</u> There are potentially water mains running through or near to part of proposed development site. If the development goes ahead as proposed, the applicant/developer will need to get in contact with our Developer Services Team to discuss asset protection or diversionary measures. This can be done through the My Developments Portal (https://affinitywater.custhelp.com/) or aw_developerservices@custhelp.com.</p> <p>To apply for a new or upgraded connection, please contact our Developer Services Team by going through their My Developments Portal (https://affinitywater.custhelp.com/) or aw_developerservices@custhelp.com. The Team also handle C3 and C4 requests to cost potential water mains diversions. If a water mains plan is required, this can also be obtained by emailing maps@affinitywater.co.uk. Please note that charges may apply.</p>	
<p>St Stephen Parish Council</p>	<p>Strong Objection: Development in an unsustainable location in the Green Belt for which Very Special Circumstances do not exist.</p> <p>The developer erroneously claims that the Parish Council would be supportive of the application by misinterpreting the index map in the Neighbourhood Plan. This plan states that policies will apply in the present (as shown below Policy S1) Built Up Area or what, prior to the failure of its Local Plan, the District Council was expected to designate as a Built-Up Area. It does not seek – nor could it – to extend the current Built-Up Area through Green Belt release.</p> <p>Unlike the larger areas proposed for Green Belt release in the District Council’s submitted Local Plan, which were of sufficient size to justify local facilities, this development represents only additional houses in Chiswell Green and should be judged as such. It is, therefore, too dense when compared with the surrounding area, which is characterised by properties on larger plots.</p> <p>There is no present need for a school at the location as the nearby Killigrew Primary School is undersubscribed. The Parish Council notes that directing resources to existing schools via section 106 would not provide the same revenue to HCC as the sale for housing of an unneeded site that had been removed from the Green Belt. It suggests that if the development is permitted to go ahead, the ‘school site’ is retained in Green Belt.</p> <p>The Parish Council is concerned that if the development is permitted, substantial improvements to Chiswell Green Lane and its junction with Watford Road will be required on land outside the applicant’s control.</p>	<p>The Planning Statement and Design & Access Statement demonstrate that VSC do exist in this case to justify the proposals.</p> <p>The Applicants understand that the updated SSNP has now been adjusted to now exclude the Site from the “built up area” on the SSNP’s policies map.</p> <p>The proposal does not just provide additional housing. It also provides land for a school (required by HCC), publicly accessible open space and playspace, self-build homes, a BNG and other benefits highlighted in the Planning Statement. The Applicants’ Design & Access Statement explains why the proposals are appropriate in this location, details of which can be considered at the Reserved Matters Application stage.</p> <p>The Applicants proposals will pay a contribution towards expanding nearby Killigrew School and will also provide land for HCC to meet future demand for schools in this location as a result of other development that may come forward as part of the future local plan.</p> <p>The highway authority will be responsible to undertake these works if they deem it necessary.</p>

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