

NMB PLANNING

Dacorum Borough Council Site Allocations DPD Examination in Public

Response to questions in Inspector's Matter 6: General Site Specific Issues

On behalf of Crest Nicholson (landholding at Red Lion Lane, Hemel Hempstead)

September 2016

Context for response

- 1.1 This response has been prepared by NMB Planning on behalf of Crest Nicholson, whom together with Linden Homes, own land south of Red Lion Lane, Hemel Hempstead, which is within the land area covered by draft Policy SA10: Education Zones in the submitted Dacorum Site Allocations DPD.
- 1.2 Crest Nicholson has responded to earlier consultations regarding the Site Allocations DPD, most recently the Proposed Focused Changes consultation which took place in September 2015.
- 1.3 Crest Nicholson are active house builders in the Borough, with the residential-led redevelopment of a former industrial site on the northern side of Red Lion Lane, Hemel Hempstead ongoing.
- 1.4 A remnant part of the redeveloped site is identified as a potential education site within Education Zone EZ/1: Nash Mills in Policy SA10 of the submitted Site Allocations DPD. The site is under the ownership of Crest Nicholson. Whilst Crest is supportive of the inclusion of the site for potential educational use, it is actively promoting the site as being more suitable for residential development. It is in this context that we respond to the relevant matters and questions raised by the Inspector ahead of the Site Allocations DPD Examination in Public.
- 1.5 Responses have been prepared to questions in Matter 2, 4 and 6.

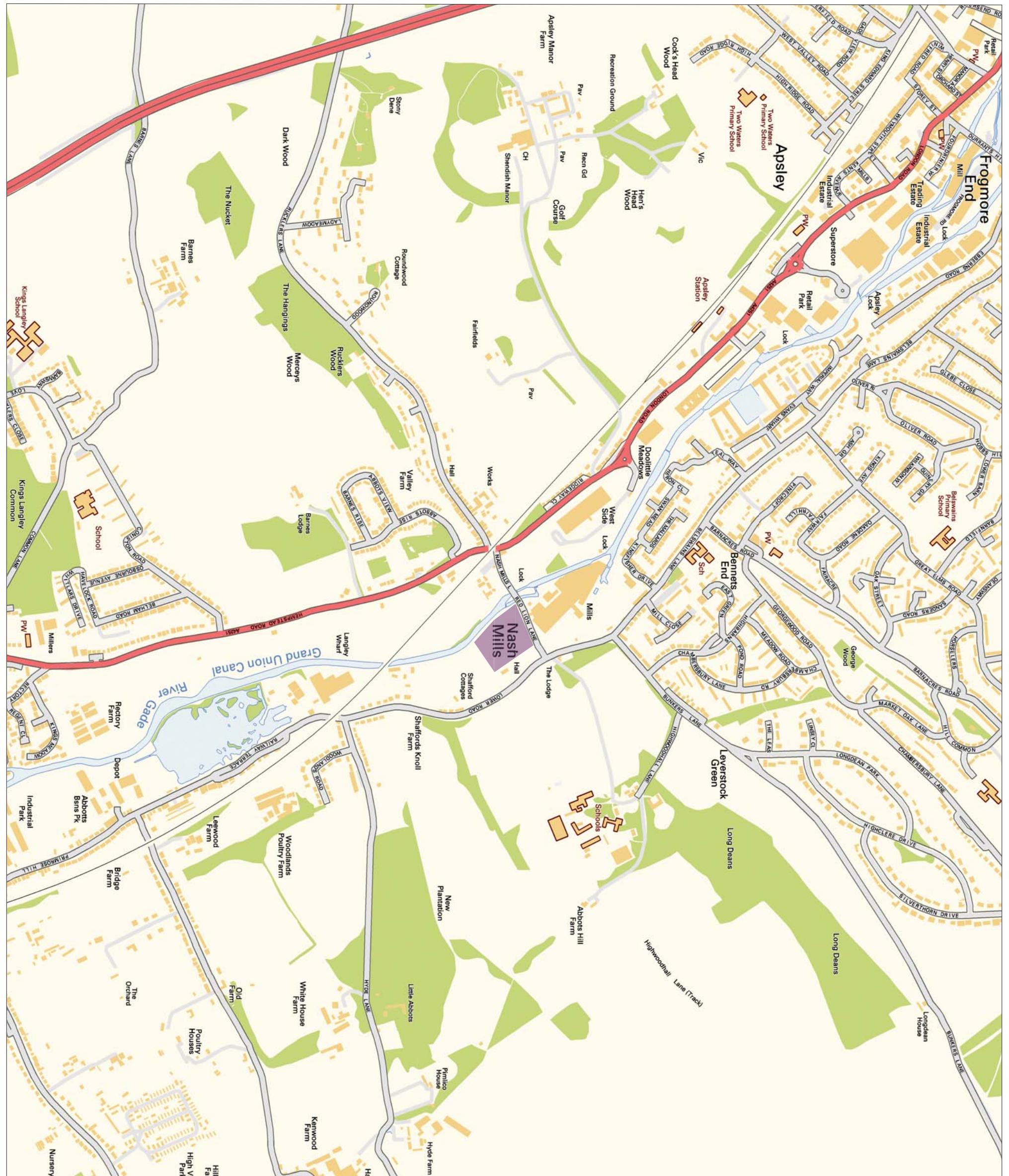
Question 3. If there is a need to identify additional land for housing, are the alternative proposals that have been put forward in representations appropriate and deliverable? Have they been subject to sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?

- 2.1 Our response to the questions in Matter 4 confirm our position that additional housing sites should be identified. In our view, the site south of Red Lion Lane, Hemel Hempstead is suitable and available for housing and could deliver an additional 38 dwellings in the next 5 years.
- 2.2 The site has undergone Sustainability Appraisal testing as part of the evidence gathering stage of the Core Strategy preparation; both as part of the larger Nash Mills site (which has now been developed for 450 dwellings), and as Land at Red Lion Lane. The findings of the assessments are contained within Examination

Document CS11: Dacorum Local Development Framework Core Strategy – Submission Stage Compendium of Sustainability Appraisal Assessments of Potential Strategic Sites and Local Allocations by Settlement, June 2012.

- 2.3 Pages 6 and 7 of document CS11 broadly assesses the wider Nash Mills site as part of the Core Strategies Supplementary Issues and Options Paper: Growth at Hemel Hempstead – November 2006. The main issues raised were the site's flood risk status, with parts of the site being in flood risk zones 2 and 3. The site was also noted for its potential for future sand and gravel extraction.
- 2.4 The wider site was assessed further in 2010 (page 19 of CS11) as part of the Additional Strategic Development Locations and Sites Assessment. The site's sustainable location was highlighted as a positive factor in favour of residential development.
- 2.5 Another assessment carried out in June 2012 (Additional and Amended Local Allocations Assessment; pages 23-26 of CS11) looked at the remaining sites which form part of the Nash Mills redevelopment area; Land at Lower Road and Land at Red Lion Lane. The assessment identified a number of positive 'green' and neutral 'white' impacts which development of the sites would have (including provision of housing, sustainable location, access to services), as well as some unsustainable 'orange' attributes. It should however be noted that the 'orange' impacts are those considered likely to have minor adverse impacts on the SA/SEA objective (our emphasis); the sites were not assessed to have any 'red' or very unsustainable significant adverse impacts.
- 2.6 The outstanding concerns including flood risk, impact of development on biodiversity, sand and gravel presence, Green Belt location/settlement coalescence and fuel pipeline potential were addressed in the information submitted to the Council's 'Call for Sites' consultation in March 2015 to inform an updated SHLAA. This information is attached for the Inspector's information.
- 2.7 In summary, the site specific issues identified in the historical Sustainability Appraisal undertaken for the Red Lion Lane site can be addressed as follows;
- Buffer zones designed to keep development away from the high risk flood zone areas, also serve to maintain a defensible buffer between settlements which would create a permanent revision to the Green Belt in this location. Furthermore, the buffer would provide ecological habitats, thus ensuring the biodiversity objective could be satisfied.

- The research undertaken to inform the Flood Risk Assessment Statement indicate that there is not sand and gravel present on the site. In any case, the site area is of limited size and would not have a material impact on minerals safeguarding in any case.
 - The possible presence of a fuel pipe along the southern site boundary has not yet been confirmed, however it would be protected by the open space buffer on the indicative masterplan.
- 2.8 It is considered that the above information, together with that submitted to the 2015 Call for Sites consultation, and submitted again to the Inspector as part of the Site Allocations DPD Examination demonstrate the suitability of the site South of Red Lion Lane for residential development. If the Inspector considers that additional housing sites are required to be identified, this site should be given due consideration.



NOTES

- This drawing is to be read in conjunction with all relevant documents and specifications.
- Dimensions are not to be scaled.



Site Location

Rev.	Description	Date	Chkd



Client:



Project:
Nash Mills
Red Lion Lane
Hemel Hempstead

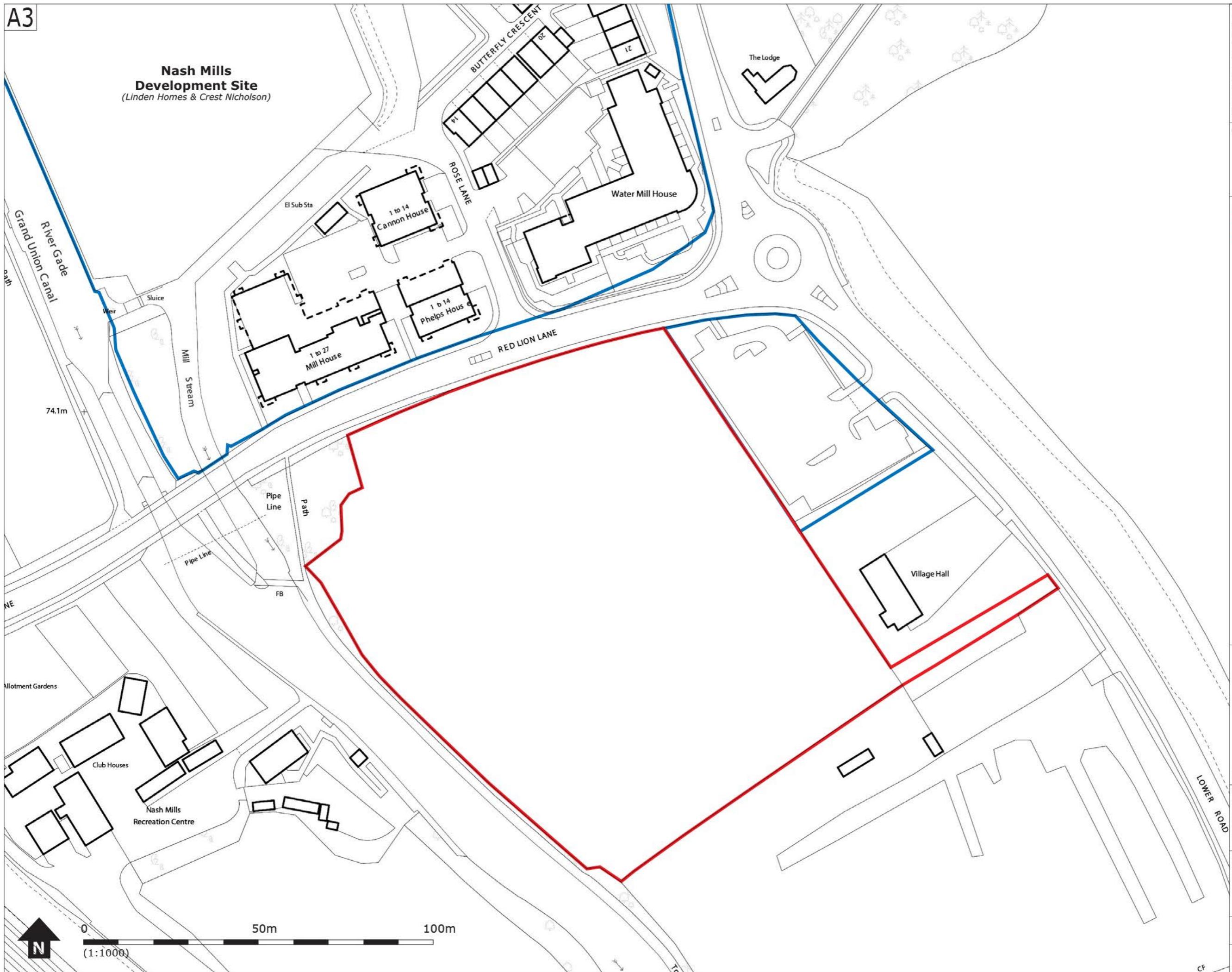
Title:

Site Location Plan

Drawing No.	Figure 1	Rev

Project Engineer: M. Ford Scale: 1:10000 @ A3
Project Director: T. Fozall Date: March 2015
Status:

A3



NOTES
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Contractors, Sub Contractors and Suppliers are to check all relevant dimensions and levels of the site and building before commencing any shop drawings or building work. Any discrepancies should be recorded to the Architect.
Where applicable this drawing is to be read in conjunction with the Consultants' drawings.
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REV	DESCRIPTION	DATE	AUTHOR	CHK'D
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KEY
■ Site boundary
■ Additional land under the control of the owner

thrive.
architects

Romsey Office
Building 300, The Grange, Romsey Road, Michelmersh, SO51 0AE
t: 01794 367703 f: 01794 367276 www.thrivearchitects.co.uk

PROJECT
Red Lion Lane
Hemel Hempstead
For: Linden Homes (Chiltern)

DRAWING
Site Location Plan

SCALE	DATE	AUTHOR	CHK'D
1.1000 @ A3	27.03.15	TB	GR
JOB NO.	DRAWING NO.	REV	
LIND150307	SLP-01	-	

NMB PLANNING

27th March 2015

Strategic Planning
Planning and Regeneration
Dacorum Borough Council
Civic Centre
Marlowes
Hemel Hempstead
HP1 1HH

Dear Sirs,

Re: Land at Nash Mills, Red Lion Lane, Hemel Hempstead HP3 9XF
Call for Sites - 2015

On behalf of Crest Nicholson and Linden Homes, in response to your new 'Call for Site' consultation, please find attached the completed proforma confirming that our site to the South of Red Lion Lane at Nash Mills continues to be available and deliverable for the uses identified in the form.

As you will be aware, the owners of the site, Crest Nicholson Homes Limited, alongside Linden Homes Chiltern Limited, are both house building developers with significant land interests in the Borough. As part of a joint venture they are currently undertaking the development of the former SAPPI site at Nash Mills (to the north of Red Lion Lane) for a mixed use development of 450 dwellings, commercial space and care home. Both Companies have a direct interest in the future planning strategy for Dacorum, and in particular proposals regarding the spatial strategy and housing provision at Hemel Hempstead.

As part of the former SAPPI site – this site has historically been identified in the SHLAA as available for housing development, as surplus land in the same ownership as the former SAPPI site – albeit as a red line site only.

In order to provide further technical information on which to assist the Council in the future review of available sites, we have undertaken some initial technical assessment work. As such, alongside the completed Call for Sites proforma I also attach the following documents:-

- A topographical survey of the site
- A Flood Risk Statement prepared by the Glanville Group
- A Technical Note on Highway access arrangements for the site by Glanville Group
- An Illustrative Masterplan for the site prepared by Thrive Architects.

The survey, alongside the Flood risk and highway assessment work has informed the creation of the illustrative Masterplan for the site, which shows the capabilities of the

site to accommodate 38 residential units. Providing a mix of dwellings sizes, alongside Public Open space and retention of significant trees, respecting the sites greenfield location, whilst abutting the urban development being undertaken at the Nash Mills site.

Given the proximity of the site alongside the River Glade/ Grand Union Canal, part of the site to the SE/SW corner lies within Flood Zone 2 and 3. As such, sequentially more vulnerable housing development has been located outside these flood zones areas, being accommodated within Flood Zone 1 only. Of the gross 1.62ha overall site area, a net 0.87 ha of land is developable within Flood Zone 1.

The Masterplan further indicates a denser flatted form of development at the northern end of the site, fronting onto Red Lion Lane, to reflect the form of development being undertaken on the Nash Mills site opposite. The lowering of density across the site towards the southern POS area along the southern boundary continues to reflect the green belt nature of the site.

It is acknowledged that the site lies within a green belt location, but has previously been lumped together with a large swath of green belt land to the East, as part of Study Area 15 in the Strategic level Stage 1 Green Belt review document prepared by Sinclair Knight Merz on behalf of Dacorum, St. Albans and Welwyn Garden City Councils, published in December 2013.

Whilst the site, on a more strategic level, when coupled with larger parcels of land to the East, is not identified as land which makes the least contribution to the five Green Belt purposes, the report acknowledges that the list of those contributing least, may not be an exhaustive list given the strategic nature of this first level assessment. This is because the Green Belt Review has been undertaken at a strategic level. It is therefore possible that additional potential small-scale boundary changes that would not compromise the overall function of the Green Belt might be identified through a more detailed survey.

The conclusion that the site be discounted from the second stage review for the reasons set out in the Review are further refuted for the following reasons:-

- Development would erode an already narrow strip of Green Belt that separates Hemel Hempstead and Kings Langley and would lead to the merging of settlements.

Response: there is a clear separation which would remain between Kings Langley and Hemel Hempstead. A clear dividing line exists by the existence of the railway line and the Grand Union Canal which sets clear boundaries between the settlements. Indeed, a significant benefit of this site over other Green Belt sites put forward as urban expansions to Hemel Hempstead is the fact that it is not cut off from the main settlement by the railway line. A Green Belt gap will continue to remain between, and protecting the separation of the two settlements, further strengthen by an appropriate buffer shown on the Masterplan.

The Nash Mills site is well located in relation to facilities and is sustainable in transport terms. The site can be brought forward without delay and can provide all the requirements for quality housing, using existing infrastructure or supplementing it as necessary. The site itself can be provided with safe access and is well located at a low point in the landscape with basic tree screening around most boundaries. Furthermore it adjoins an existing development by Linden Homes and Crest Homes.

In securing and identifying additional releases of Green Belt land through the 2nd stage of the Review, the Nash Mills site is considered acceptable as a local smaller parcel of land than that previously consider at a strategic level in Stage 1 of the Review. On its own and not as part of the wider parcel 15, it does fall within the category of 'contributing least' to the Green Belt function and there remains scope to include it in the 2nd stage considerations, alongside its inclusion in the updated SHLAA.

It is considered that the Land South of Red Lion Lane as identified here, aligns more closely with land to the West of the site , Parcel 14B. – which in itself has been identified for further review in the next Part 2 stage of the Green Belt Review. Furthermore, the appraisal work undertaken and presented here in the illustrative masterplan , provides a clear indication that a robust southern buffer can be maintained to secure the retention of the five purposes of Green belt.

It has been noted that the site, as part of a wider zone, (again with neighbouring parcels to the East of the site) , has been identified in the emerging Pre submission Site Allocations DPD as part of Education Zone EZ/1. This Zone identifies a potential area for the delivery of new primary school places in the Nash Mills area. The zone is identified as 'areas of search' for primary school sites. In the first instance, whilst being available, it is to be noted that the overall gross site area is 1.62ha which falls below the aspirational site area for a two form entry primary school set at 2.5ha. The site area, therefore falls short of the initial space standards sought. However, it is also noted that the other land parcels falling within the EZ/1 – exhibit similar size constraints. We await the further finding of the feasibility studies being undertaken by the Education Authority before commenting on this aspect further.

In the interim – we again put this site forward for inclusion in the updated SHLAA, and in light of the further technical information submitted, look forward to its inclusion in Stage 2 of the Green Belt review as part of the evidence base for the Early Partial review of the Core Strategy/Single Local Plan.

Kind Regards

Nicki Broderick MRTPI

NMB Planning Ltd

01753 540919/07966 494998

**DEVELOPMENT ON LAND BOUND BY
RED LION LANE AND LOWER ROAD, HEMEL HEMPSTEAD, HERTFORDSHIRE**

INITIAL FLOOD RISK APPRAISAL

TECHNICAL NOTE

Introduction

This Flood Risk Statement has been prepared by Glanville Consultants on behalf of Linden Homes. The statement considers flood risk associated with a potential development at a site in Nash Mills to the south of Hemel Hempstead.

The site is located to the south of a community centre and car park which can be accessed from Red Lion Road. Red Lion Lane forms the northern boundary of the site. The Grand Union Canal forms the western boundary and an open field is located to the south. The site appears to be relatively flat with a slight fall towards the south. There are a number of mature trees in the north west corner of the site and further trees along the eastern boundary.

National Geological mapping indicates that the site is likely to be underlain with superficial deposits of clay, silt and sand above chalk bedrock formed during the Cretaceous Period. The chalk bedrock is a principal aquifer and the eastern half of the site is indicated to be an outer zone 2, groundwater source protection zone. Environment Agency records also indicate that superficial deposits may be partially classed as a secondary aquifer indicated the potential predominance of sand.

Fluvial Flood Risk

Environment Agency flood maps indicate that the site is located in a mix of flood zones with the majority of the site being located in Flood Zone 1, the lowest risk Flood Zone with a chance of flooding of less than 0.1% in any given year. The southern corner of the site and land adjacent to the canal located in Flood Zone 3, the zone considered at high risk of flooding with a risk of greater than 1% in any given year. A smaller section in the south east corner is located in Flood Zone 2, the zone considered at risk of flooding from between 1% and 0.1% in any given year.

These Flood Zones are shown in detail on the below plan with the area in lilac being Flood Zone 3 and the area in light blue, Flood Zone 2 accordingly. The Environment Agency have confirmed that they do not have detailed flood levels associated with flooding from the canal. The extent of the various Flood Zones are therefore based on broad scale flood mapping, which are generally prepared by the Environment Agency using a precautionary approach and are therefore considered robust.



As such, the masterplan will be developed using a sequential approach to locate more vulnerable development in the lowest risk flood zone. A buffer zone will also be formed adjacent to the canal with only flood compatible amenity space considered for the southern triangle of the site located in higher risk flood zones. As a result, land uses on the site will be considered sequentially to be appropriate in respect of the National Planning Policy Framework.

Finished floor levels will be set such that there are a minimum of 300mm above the extent of flood plain associated with the site, which will be determined by comparing flood zone extents with the detailed topographical survey.

Surface Water Flood Risk

Environment Agency surface water flood maps indicate that the majority of the site is at low risk of flooding from surface water sources. Sections of the site to the north and east are considered at very low risk.

Sewer Flood Risk

The Strategic Flood Risk Assessment (SFRA) prepared for Decorum Borough Council provides information obtained from the local sewage undertaker on recorded flood events from sewers in the last 10 years. The register indicates that there were no incidents of flooding within the HP3 postcode associated with the site and as such, the site is considered to be at low risk from this source.

Ground Water Flood Risk

The SFRA identifies historical flooding from groundwater sources within the borough. This indicates that there are no incidents of groundwater flooding on or in the vicinity of the site. The site is therefore considered to be at low risk from this source.

Historical Flooding

The SFRA identifies historical flooding within the borough and indicates that there have been no incidents of historical flooding affecting the site.

Sustainable Drainage

National and local planning guidance recommends that priority should be given to the use of sustainable drainage systems as they are designed to control surface water run-off where it falls and mimic natural drainage as closely as possible. Sustainable drainage systems also provide opportunities for the following:

- Reduce the causes and impacts of flooding;
- Remove pollutants from urban run-off at source; and
- Combine water management with green space with benefits for amenity, recreation and wildlife.

SuDS encompass a wide range of drainage techniques intended to minimise the rate of discharge, volume and environmental impact of run-off and include:

- Permeable pavements;
- Swales and basins;
- Green roofs and rainwater reuse;
- Infiltration trenches and filter drains; and
- Ponds and wetlands.

Infiltration based techniques are high up in the hierarchy of techniques available due to the ability for close to source dispersion of surface water. These techniques are considered the closest solution to mimic the natural drainage of undeveloped sites. As well as allowing infiltration and attenuation, permeable paving also degrades pollutants such as hydrocarbons, which thereby improves the quality of surface water to ground.

As the site is underlain by porous bedrock, it is considered likely that the proposed development can be drained via the use of infiltration based techniques subject to achieving acceptable offset distances from buildings. Surface water storage will be considered as part of the design to cater for the worst case 1:100yr + 30% rainfall event. This will mitigate against the risk of surface water flooding effecting the site and will reduce flood risk from this source to an acceptable level.

The exact nature of the proposals will need to be informed by an intrusive site investigation which will include investigation of groundwater levels, potential infiltration rates and testing of sub soils.

Conclusion

An examination of potential sources of flood risk has identified that majority of the site is at low risk from fluvial sources on the site with the triangle of land in the south of the site at potentially high risk and the rest of the site at low risk. The development will therefore be planned accordingly with water compatible uses considered for the areas considered at high risk and more vulnerable proposals located in the area of the site at low risk from this source.

Assessment of other risks of flooding has identified that there is a low risk from all potential sources.

It is considered that a suitable drainage strategy can be prepared using infiltration drainage techniques subject to the recommendations of an intrusive geo-environmental investigation.

It is considered that the site can be developed for the proposed use subject the appropriate mitigation measures detailed above such that the more vulnerable elements of the development are considered at low risk of flooding and there is no increase in flood risk elsewhere.

A3



NOTES

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REV	DESCRIPTION	DATE	AUTHOR	CHK'D



thrive.
architects

Romsey Office
Building 300, The Grange, Romsey Road, Michelmersh, SO51 0AE
t: 01794 367703 f: 01794 367276 www.thrivearchitects.co.uk

PROJECT
Red Lion Lane
Hemel Hempstead
For: Linden Homes (Chiltern)

DRAWING
Illustrative Masterplan

SCALE 1.1000 @ A3 **DATE** 25.03.15 **AUTHOR** TB **CHK'D** GR
JOB NO. LIND150307 **DRAWING NO.** IMP-01 **REV** -