

DELEGATED REPORT

APPLICATION No:	N6/2005/0524/FP
DESCRIPTION:	REMOVAL OF EXISTING 36 METRE TELECOMS MAST AND ERECTION OF A NEW 45 METRE MAST WITHIN FENCED COMPOUND
LOCATION:	HERTFORDSHIRE CONSTABULARY, STANBOROUGH ROAD, WGC

THE SITE

The application site is located on the eastern site of Stanborough Road. The site forms the Police Headquarters and has been recently been approved permission for redevelopment which is not commencing on the site.

THE PROPOSAL

The proposal within this application is to replace the existing telecoms mast within the site which is used for police communications and also provides sharing for mobile phone operators.

PLANNING HISTORY

N6/2003/0949/FP - PHASED REDEVELOPMENT OF EXISTING POLICE AUTHORITY HEADQUARTERS INVOLVING PARTIAL DEMOLITION AND CONSTRUCTION OF UP TO A TOTAL OF 20,000 SQUARE METRES OF B1 OFFICE FLOORSPACE, CREATION OF NEW EMERGENCY ACCESS, EXTENSION AND RECONFIGURATION OF EXISTING CAR PARKING, RELOCATION OF EXISTING TELECOMMUNICATIONS MAST AND AERIALS AND COMPREHENSIVE LANDSCAPING. Approved January 2004

SUMMARY OF RELEVANT DEVELOPMENT PLAN POLICIES

Hertfordshire Structure Plan Review 1991- 2011:

- Policy 21 - Telecommunications

Welwyn Hatfield District Plan 2005

- R21 – Telecommunication Development

REPRESENTATIONS

Application advertised by means of notification letter and site notice.

No representations received.

DISCUSSION

The main issues in relation to this application relate to the siting and appearance of the proposal and its impact on the character and appearance of the area. Guidance is provided by policy R21 of the adopted Plan, as well as the relevant policies of the Structure Plan and PPG8.

There are eight requirements under policy R21 and each will be considered in turn in respect of this proposal (a copy of Policy R21 is appended to the rear of this report):

- (i) The site is a replacement for an existing mast on this site. Planning permission was granted in 2004 for the redevelopment of the police headquarters site which involved a phase of development over the existing mast site. The application included the provision for the replacement of the mast however the details of its location and requirement were left to be determined by a separate application which this now forms. The development is therefore not for the construction of a completely new structure, but a replacement for the existing.
- (ii) The mast is already proposed to be used by two mobile phone operators as well as housing the necessary police equipment, and further provision for other operators has been made.
- (iii) A compliance certificate has been submitted in relation to the ICNIRP guidelines.
- (iv) The plans state that the Exclusion Zones conform to the ICNIRP reference levels for limiting RF exposure to members of the general public and appropriate fencing is located around the base station at ground floor level.
- (v) PPG8 in relation to telecommunications development near to schools states that the LPA should consult the relevant bodies and take into account any relevant views expressed. Stanborough School is located approximately 475m from the school. The school has been consulted as part of the application and no comments have been received, and the proposed development is to be located further from the school than the existing mast.
- (vi) The development is required to provide a replacement for the existing mast which is coming to the end of its life and which is to be removed to make way for the redevelopment of the site. The mast is required to provide service for the Police headquarters, but is also utilised for site sharing for mobile phone service providers. Whilst the mast is to be 45 metres in height, 6 metres higher than the existing mast, its new siting is such that the ground level is 5 metres lower in this position and therefore overall the mast will only appear 1 metre higher within the skyline. The mast has been designed to accommodate all the existing

telecommunications equipment on this single facility and will therefore also remove the existing equipment located on the roofs of some of the buildings within the site, improving the overall appearance and clutter within the site.

The development will appear visible within the headquarters, due to the landscaping and other development within the site the mast will not appear unduly dominant in the sites immediate surroundings. The mast will appear visible within area above the skyline of the surrounding vegetation and other buildings. The mast is required to be this height to gain the necessary coverage but also due to the sky slope located near to the site. The mast as only 1)metre higher than the existing mast at the site will not have a greatly increased visual impact and will not appear any more visually prominent. Any slight increased visual impact would however be outweighed by the need and requirements of the proposal.

The plans have also been amended so that landscaping is provided to the areas in front and behind the proposed enclosure. The palisade boarding is acceptable and replicated other fencing used within the site. The site will be largely enclosed at low level by the buildings to the west and east and the landscaping areas to the north and south will provide an effective screen to the enclosure and lowest parts of the structure.

To ensure that the development will not appear visually intrusive once completed and to avoid visual clutter a carefully worded condition will be required to ensure the removal of the existing mast. There will need to be a hand over period between the existing and proposed and this is proposed to be 18 months for the transfer of equipment and to ensure that services are provided to an acceptable degree on the site. This time period is considered acceptable in this case.

- (vii) The site is not within a Conservation Area or in the setting of a Listed Building.
- (viii) The proposal is not on a building.
- (ix) The site is not located within an area designated for their landscape, historic or nature conservation importance. Whilst the site is located close to the boarder with the green belt the proposal as detailed above is not considered to have any increased detrimental impact on the openness of the green belt than the existing mast and the technical requirements for the mast are considered to outweigh any slight harm the development would have.

In relation to concerns in connection with the health risks of mobile phone technology guidance updated in the August 2001 version of Planning Policy Guidance 8 deals with health considerations. Planning Policy Guidance Note 8 states in paragraph 30 that:

"it is the Governments firm view that the planning system is not the place for determining health safeguards. It remains central Governments responsibility to decide what measures are necessary to protect public health. In the Governments view, if a proposed mobile phone base station meets the ICNIRP guidelines for public exposure it should not be necessary for a local planning authority, in processing an application for planning permission or prior approval, to consider further the health aspects and concerns about them."

I am of the opinion that on the balance of the best advice available at the present time, that the 'precautionary approach', which is widely referred to (paragraph 31 of PPG 8), consists of the application of the more stringent ICNIRP Emissions Guidelines for levels of public exposure to RF radiation to telecommunications development. If the ICNIRP guidelines are complied with then the precautionary approach has been satisfied and the Local Planning Authority should not attach greater weight to the health concern as a material planning consideration. As previously indicated the proposal complies with the ICNIRP standards, therefore, I do not believe refusal on health grounds or on the fear of adverse effects would be justified and to withhold planning permission solely on these grounds would be unreasonable.

CONCLUSION

The development is for the replacement of the existing mast for police telecommunications as well as site sharing for mobile phone service providers. The development is required as the mast is coming to the end of its operational life and the redevelopment of the site means that the existing site will be built over.

The mast will appear 1 metre higher within the skyline and this slight increase is not considered to have an unacceptable impact in relation to visual intrusion or the open character of the green belt which is located in close proximity to the site.

A carefully worded condition is required in relation to the removal of the existing mast.

RECOMMENDATION

Recommend approval subject to conditions

CONDITIONS

1. SC01
2. SC09
3. Before the development hereby permitted is commenced the external colour finish of the mast, base station and enclosing fence shall have been agreed in writing with the Local Planning Authority. Thereafter the finish of the installation provided on site shall be in accordance with the details so agreed

Reason

In order to enhance the visual appearance of the mast, base station and fence to comply with Policy R21 of the Welwyn Hatfield District Plan 2005.

4. The enclosure fence to be provided surrounding the mast hereby approved shall be completed in accordance with the details submitted on 9 June 2005, unless otherwise agreed in writing by the Local Planning Authority.

Reason

To ensure the appearance of the site does not appear visually intrusive in line with R21 of Welwyn Hatfield District Plan 2005.

5. The existing mast shall have been dismantled and completely removed from the site and the site restored, no later than 18 months following the commencement of development of the mast hereby approved, unless otherwise agreed in writing by the Local Planning Authority.

Reason

To ensure the accumulation of structures will have an unacceptable visual impact and to avoid visual clutter and in accordance with R21 of the Welwyn Hatfield District Plan 2005.

SUMMARY OF THE REASONS FOR THE GRANT OF PERMISSION/ CONSENT

It is considered that the proposed development does not have an unacceptably harmful impact on the character of the area in which it is located as the development proposed is in keeping with the existing mast to be replaced and will not have a visually harmful impact on the surrounding area.

INFORMATIVES

NONE

DRAWING NUMBERS

H0305-0001 Rev D
H0305-0002 Rev D
H0305-0003 Rev D
H0305-0004 Rev D
H0305-0005 Rev D
Fencing Details

Received 9 Jun 2005

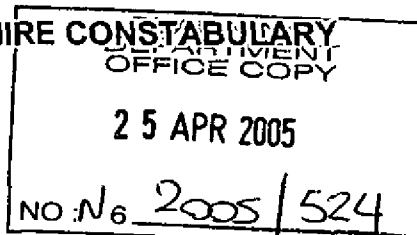
**REPORT TO THE CHIEF PLANNING AND
ENVIRONMENTAL HEALTH OFFICER**

N6/2003/0949/FP

Phased redevelopment of existing police authority headquarters involving partial demolition and construction of up to a total of 20,000 square metres of b1 office floor space, creation of new emergency access, extension and reconfiguration of existing car parking, relocation of existing telecommunications mast and aerials and comprehensive landscaping

POLICE HEADQUARTERS, STANBOROUGH ROAD, WELWYN GARDEN CITY

APPLICANT: HERTFORDSHIRE CONSTABULARY



(Hollybush Ward)

1.0 INTRODUCTION

- 1.1 The application was submitted on the 23rd June 2003 and envisages the redevelopment of the existing County Police Headquarters. The application is one which is being considered under delegated powers, because while the proposal is significant it complies with the policies contained in both the adopted District Plan Alterations Number 1, 1998 and also those contained in the Plan Review Revised Deposit Version June 2002.
- 1.2 The site itself is located in the north of the sailing lake at Stanborough Park. The site is bounded by the park to the south, Stanborough Road (A6129) to the west, Gosling Sports Park to the north and the East Coast Main Line to the east.
- 1.3 The existing buildings on the site predominantly occupy an elevated position on the north west corner. The current buildings are an accumulation of styles, sizes and designs of no particular architectural merit. Parking on the site currently provides severe difficulties for staff and visitors with operational vehicles intermingling with staff and visitor parking.
- 1.4 The main public view of the site is from Stanborough Road up through the existing access. The site on this boundary is a thickly hedged bank containing mainly native species which is bisected by the existing cycleway that links Welwyn Garden City Town Centre with Stanborough Lakes. Long distance views of the existing buildings on the site, some of which are up to four storeys in height, can be obtained from the Jack Oldings Roundabout. There are playing fields used by the police as well as a firing range which are located between the main developed portion of the site and the boundary of it with Stanborough Lakes.
- 1.5 The applicant has submitted a detailed planning and design statement that further elaborates on the application and this should be read in conjunction with the report on this application.

2.0 THE PROPOSAL

- 2.1 The planning application covers two phases of work which are proposed by the applicants and all of the work which is proposed is covered in this application. The proposal envisages the provision of a large number of additional parking spaces which are justified by the explicit operational requirements of the police, for example, in terms of the fact that the proposal effectively requires a doubling up in the parking provided on the site by virtue of the fact that a significant proportion of those travelling to the site and employed there will be arriving using their own vehicle and then doing their job using either police patrol vehicles or undercover vehicles which are kept at the site. The proposal anticipates the construction of some 20,000 square meters of mainly B1 office space and the provision of additional car parking facilities. The first phase of development includes the construction of a county wide operational support building (OSB) and the separation of the operational vehicles from the staff and visitor parking through the construction of additional on-site parking. The building itself would be some 13 metres in height, of a contemporary design and appearance with a domed roof. The materials include brick, render, glass and painted steelwork with a domed metal roof.
- 2.2 The first phase includes a new vehicular access to the site. The Constabulary is required to provide a secondary means of access to the site as part of Home Office requirements which also forms part of the first phase of development. This manifests itself in a new emergency access to be constructed to the south of the existing entrance that would access Stanborough Road by way of a cutting through the existing hedged bank.
- 2.3 The second phase of development anticipates the demolition and replacement of existing buildings to provide for a rationalisation of the existing office accommodation. The buildings within the second phase include three storey structures of up to 15 metres in height and would be of a similar design, appearance and materials as the OSB building. The proposal envisages the replacement of the existing 13,250 square metres of floorspace with the construction of a total of 20,000 square metres of new floorspace.
- 2.4 Two sizeable areas of buildings to the North of the site, including the skid pan, the vehicle workshops and the forensics department remain unaffected by this application.

3.0 PLANNING HISTORY

- 3.1 There have been a number of relatively minor applications for new buildings and the provision of new car parking at the site since the construction of the original buildings in 1969. However there have been no recent applications of note, or of this magnitude.

4.0 RELEVANT PLANNING POLICIES

- 4.1 Hertfordshire County Structure Plan 1998
Policy 25 Car Parking
Policy 46 Open Space within Towns
- 4.2 For the purpose of this report the advanced stage of the Welwyn Hatfield District Plan Review Revised Deposit Version June 2002 means that this development will be assessed using those policies and guidance. For the sake of completeness the policies of the Adopted Plan are stated at paragraph 4.3.

SD1	Sustainable Development
Resources Policies	
M1	Integrating Transport and Land Use
M4	Green Transport Plans
M6	Pedestrian Facilities
M7	Cycle Routes and Facilities
D1	Quality Of Design
D2	Character and Context
D3a	Design for Movement
D5	Design Statements
OS1	Urban open Land
M19	Parking Standards for New Development

Supplementary Design Guidance

Supplementary Planning Guidance produced in relation to Policy 25 of the Structure Plan

- 4.3 Welwyn Hatfield District Plan Alterations No 1 1998
 BEV2
 BEV3
 BEV5
 T3
 T5
 T15
 GEN Criteria 1, 2 and 4

5.0 **REPRESENTATIONS RECEIVED**

- 5.1 The application was advertised by the direct notification of adjoining neighbours by letter, the display of a site notice and press notice.
- 5.2 The application was submitted with letters of support from the Chairman of Hertfordshire Police Authority, The Chief Constable of Hertfordshire and the Constabulary's Director of Support Services. These letters outline the necessity and rationale behind the planned new facilities and why the new buildings are required as part of a strategic review of policing in Hertfordshire.
- 5.3 No letters of support or objection have been received from persons or occupiers of commercial premises or residential property in the vicinity of the site.
- 5.4 The Environment Agency have no objection to the development subject to the application of a number of standard conditions.
- 5.5 Thames Water have similarly no objection subject to standard conditions.
- 5.6 Welwyn Garden City Society have not commented on the application.
- 5.7 Hertfordshire County Council as the Highway Authority have provided a detailed response to the application. The response raises no objection in principle to the application but in order to be acceptable to the Highway Authority a range of issues are required to be addressed and provided for within a Section 106 legal agreement and the response suggests a number of planning conditions should

the Local Planning Authority be minded to resolve to grant consent. In terms of contributions the S106 agreement would need to provide for £30,000 improvements to the cycle network and £18,000 to provide for two bus stops.

- 5.8 WHAG the Welwyn Hatfield Access Group have made their usual representations regarding compliance with the disabled access requirements of the District Plans.
- 5.9 National Air Traffic Services and the Civil Aviation Authority were also consulted principally regarding the proposed helipad. Neither organisation raised an objection but written confirmation has been obtained deleting this element from this application.

6.0 APPRAISAL

6.1 The planning issues presented by this application can be summarised as follows:

1. Firstly the physical impact of the proposed new development and its impact on the character and appearance of the area in terms of the design policies of the District Plan Review. Second in this section is the assessment as to whether or not sufficient consideration has been given with regard to the resources section of the plan for such issues as development on previously developed land, energy efficient buildings and water management.
2. The implications of the proposal on the land to the south of the existing buildings in the light of the recent urban open land designation (policy OS1) within the District Plan Review and the proposed associated enhancements to landscape and the biodiversity of the site.
3. The impact of the proposals on the existing highway network, compliance with the parking standards and the requirements of the Highway Authority in terms of off-site highway improvements, the requirements to provide a green travel plan and the phasing implications for construction and car parking. These requirements mainly stem from the movement section of the District Plan Review.

6.2 **Physical Impact and form of Development.**

The proposal envisages development in two principle phases:

This is firstly the construction of the Operational Support Building (OSB) and secondly the rationalisation of the existing office space and then the construction of the remaining buildings. The provision of car parking numbers and phasing will be dealt with under the highways section later within this report. The entire site lies within the urban area of Welwyn Garden City (which is excluded from the surrounding Green Belt) so there is no objection in principle to the application. The new car park to the South of the site does encroach onto the urban open land recently designated as part of the District Plan Review and I will refer to this aspect of the below.

6.3 The design statement makes clear that the buildings will be BREAMM assessed with the aim of reducing energy consumption and increasing their sustainable function wherever possible. I therefore see no reason to further question this aspect of the development. Turning to the physical impact of the development I would comment as follows. The buildings are of a contemporary modern design and construction with a combination of materials to be used as the site is seen in relative isolation from any local vernacular architecture that means that there is no real built form that is required or necessary to satisfy the character or context of the area. My main concerns are therefore the size and massing of the structures on the site. When seen from the nearest public viewpoint in Stanborough Road the site benefits from good screening because of the wide verge and bank through which the cycleway passes. In most places there are three belts of landscaping comprising of tall hedge and mature trees. In combination this means that there is little public view of the site other than through the existing vehicular access point. The other public views of the site are mainly from Stanborough Lakes and the Oldings roundabout. There are limited views from the Gosling Stadium to the north and the railway to the east but because of their restricted nature these are less of a concern.

6.4 The longer views of the site from Oldings Corner and Stanborough Lakes are important given that the application anticipates an increase in size and bulk of the buildings. The main reason that the existing development on the site is not particularly prominent appears to be the tree planting on a large bank in Stanborough Park. The elevated height of the bank and the mature trees serve to provide a partial screen to these views and this will help screen the additional buildings from these key views. The Council's Landscape advisor has given consideration to the strengthening of the planting on the bank but it is considered that this would be at a cost to the wind requirements of the sailing facility within Stanborough park whose management is extremely reluctant to accede to the request for further structural planting. It should be stressed at this point that the proposal in its final form would replace a diverse collection of buildings with a single over arching design ethos to the benefit of the character and distinctiveness of the area. Given the relative isolation of the site and therefore the lack of any relevant design context I see no reason to question the modernity of the design approach.

6.5 With regard to the repositioning of the radio mast at the site I am mindful that this provides a site sharing facility for mobile telephone operators as well as accommodating the police's communication requirements. The repositioning of the mast itself raises no real issues in terms of the physical appearance but the loss of the facility during the construction process may give rise to a number of temporary structures or even pressure for additional facilities outside the site boundary. Given the difficult nature of accommodating telecommunications operators within Welwyn Garden City my view is that a planning condition to any likely permission that ensured that the new mast be constructed and commissioned before the existing is demolished would be reasonable.

6.6 Having given due consideration to the issues as mentioned above I am of the opinion that the proposed buildings on the site will not be unduly prominent or dominant and that the justification provided within the Planning and Design Statement submitted with the application is sufficiently robust in terms of the design and performance of the individual buildings. Therefore my opinion is that the proposal is acceptable in terms of relevant design policies D1, D2, D3a, D5 and the relevant resources polices R1, R3, R9 of the District Plan Review.

- 6.7 Urban Open Land (UOL 127/128) and Landscape Ecology Considerations**
The purpose of designating Urban Open Land is outlined under Policy OS1 of the District Plan Review. The main encroachment on this land envisaged by this proposal is the new car park area to the south of the site. This is a relatively discreet area of the site in term of the views of the public. My view is that as no actual buildings are anticipated in this area and that provided significant structural planting is provided in the area of the car park, as the applicants have indicated will be the case, the contribution of this area as a break to development in the urban area will be maintained and the integrity of the function of the land as urban open land will be protected.
- 6.8** The development of the site will be accompanied by a landscaping strategy that can be secured by relevant hard and soft landscaping conditions to any planning permission that may be granted. The Council's Landscape and Ecology section have had a preliminary input into the application and the applicant is fully aware of the Council's likely requirements with regard to these matters. It is anticipated that this landscaping strategy will reinforce the function of the UOL designation as mentioned above and introduce opportunities to improve the biodiversity of the site through the introduction of native species and hedgerow wildlife corridors. Therefore I believe that the proposal is compatible with policy OS1 (Urban Open Land), R14 (Trees, Woodlands and Hedgerows) and policy R 15 Biodiversity and development) of the District Plan Review.
- 6.9 Highway and parking issues**
Given that the built form of the application would meet the policies and design criteria of the Adopted and Revised District Plans and that the development can be successfully accommodated within the constraints provided by the Urban Open Land designations I will now turn to the highway issues. The County Council have made clear their requirements with regard to this application within a letter received on the 01/09/2003 to which I shall refer below. As mentioned previously the site lies on the periphery of the urban area of Welwyn Garden City and is served by pedestrian and cycle links to the town centre.
- 6.10** The approach of the Council to highway and associated transport issues is articulated within the movement section of the District Plan Review. This application raises one fundamental question when considering the highway issues associated with this application. This is with regard to compliance with the parking standards where I would comment as follows. The current parking situation on site could be best described as chaotic with operational vehicles intermingling with staff and visitor parking and with the appearance of little or no management of the car parking on site. The applicant proposes to separate out the operational parking of police vehicles from the parking requirements of the existing and proposed floor space of the site. Information has been supplied in confidence to the Council regarding the numbers and detail of the Policy HQ operational parking requirement and it is accepted that motor vehicles themselves would properly be considered to be an essential component of police operations.
- 6.11** I am therefore of the view that the number of operational vehicles at the site, some 279 vehicles, should not be included within the maximum number of parking spaces that would be generated by the existing and proposed floor space

in the light of the maximum parking standards identified by Supplementary Planning Guidance 25. The County Council as the Highway Authority support this view subject to the application of a planning condition limiting the total number of spaces to no more than 991 car parking spaces. In terms of implementation the development is proposed in two phases with the provision of the operational parking (279) and the additional parking for the first phase of development (162) and the reconstruction and rationalisation of the existing parking (398) to yield an initial first phase total of 839. 152 further parking spaces are to be provided following demolition and reconstruction anticipated by the second phase of development. The applicant is agreeable to the parking provision being linked to the phased provision of floor space by way of triggers in the section 106 agreement. The applicant has also indicated a willingness to introduce a car parking management plan as part of the S106 agreement to ensure that the operational, staff and visitor parking is operated efficiently and to attempt to avoid the current problems that exist on the site.

- 6.12 The County Council consider that the application will not have a negative impact on the capacity of the highway network and that there is no requirement for off-site highway improvements. The County require the imposition of a condition to provide and ensure the retention of a 4.5 * 90 metre visibility splay for the emergency access. The County also require the imposition of a planning condition to prevent construction works interfering with the public highway and the provision of 70 covered cycle spaces and 35 secure motorcycle spaces.
- 6.13 The County have made clear that the site needs to be more accessible to other modes of travel. To these ends there is a requirement for the applicant to fund two bus stops (£18,000) and make a contribution to the improvement of the cycle network (£30,000) and the applicant has agreed to these contributions. Furthermore the applicant will be required to develop a "Green Transport Plan" to develop and encourage the use of transport other than the private motor vehicle. The applicant is aware that the development of the GTP will be a component of the S106 agreement.
- 6.14 As mentioned above in 6.11 the development is anticipated in two distinct phases. It is considered that a construction method statement will be required as a condition to any planning permission that identifies areas for contractor's storage and accommodation and the temporary parking arrangements for all users of the site during the construction phases. The method statement will dovetail with the phasing provision of the car parking as required by the s106 agreement.
- 6.15 Subject to the appropriate planning conditions and the S106 agreement (in line with policy IM 2) I believe that the proposal complies with the main relevant Movement Policies M1, M3, M4, M5, M6, and M7 of the District Plan Review.

7.0 CONCLUSION

Having carefully considered the matter I am confident that the application can be successfully assimilated into the local built environment and will not adversely affect the character or appearance of the area. In this respect the application complies with policies contained within both the adopted District Plan and in the Plan Review together with the supplementary design guidance which accompanies the Plan Review. The proposals are substantial, but the site is peripheral to the town and as has been noted is well screened in terms of the

public views which can be gained of it. The proposal has an impact on the designated Urban Open Land but the essential function of it is unaffected by the proposal and with the benefit of additional landscaping it is the opinion of the LPA that the proposal will actually reinforce the function of the Urban Open Land.

8.0 RECOMMENDATION

8.1 It is recommend that planning application N6/2003/0949/FP be approved subject to the completion of a satisfactory Section 106 legal agreement to secure the following:

1. The provision of a commuted sum of £30,000 towards the improvement of cycleways in the vicinity of the site.
2. The provision of a commuted sum of £18,000 for the construction of two bus stops.
3. The provision of a construction plan or construction method statement that includes storage of construction materials, temporary parking and contractors parking during the construction phases.
4. The formulation, introduction and monitoring of a green travel plan for all users of the site.
5. To secure the implementation of a management plan in relation to the visitor, staff and operational parking.
6. To ensure that the car parking on the site is constructed in accordance with the phased implementation of additional floor space.

Subject to the satisfactory completion of the Section 106 Agreement I recommend that Application N6/2003/949/FP be approved subject to the following conditions:

1. SCO1 Standard Time Limit
2. SC19 Materials
3. No development shall take place until full details of both hard and soft landscape works and an implementation programme have been submitted to and approved in writing by the local planning authority. These works shall subsequently be carried out as approved. These details shall include *proposed finished levels or contours; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials and lighting.*

Soft landscape works shall include planting plans; written specifications (*including cultivation and other operations associated with plant and grass establishment*); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate.

All hard and soft landscape works shall be carried out in accordance with the approved details. The works shall be carried out prior to the

occupation of any part of the development or in accordance with the programme agreed with the Local Planning Authority

Reason

In order to safeguard the appearance of the development, reinforce the function of Urban Open Land 128 and to improve the biodiversity of the site.

4. Development shall not commence until details of the on site drainage works have been submitted to, and approved by, the Local Planning Authority in consultation with the sewerage undertaker. No buildings authorised as a result of this permission shall be occupied until the on-site drainage works referred to above have been completed.

Reason

In order to ensure the provision of adequate sewerage capacity.

5. Surface water drainage works shall be carried out in accordance with details which shall have been submitted to and approved by the Local Planning Authority before development commences.

Reason

To prevent the increased risk of flooding.

6. Surface water source control measures shall be carried out in accordance with details which shall have been submitted to and approved by the Local Planning Authority before development commences.

Reason

To prevent the increased risk of flooding and to improve water quality.

7. Before the development is commenced, a detailed site investigation shall be carried out to establish whether the site is contaminated, to assess the degree and nature of the contamination present, and to determine its potential for pollution of the water environment. The method and extent of this site investigation shall be agreed with the Planning Authority prior to the commencement of the work. Details of appropriate measures to prevent pollution of groundwater and surface water, including provisions for monitoring shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall then proceed in strict accordance with the measures approved.

Reason

To prevent pollution of the water environment.

8. No soakaways shall be constructed in contaminated ground

Reason

To prevent pollution of groundwater

9. Prior to the removal or decommissioning of the existing telecommunications mast the replacement mast shall be made fully operational in the position indicated on drawing 5012542AA/0044203 Rev O unless the Local Planning Authority otherwise agrees in writing.

Reason

To avoid any unnecessary proliferation of permanent and temporary telecommunication structures and to comply with Policy BEV21 of the Welwyn Hatfield District Plan Alterations No. 1 1998.

10. All parking, delivery and storage areas associated with the construction of the development, including the access works must be provided on land which is not public highway and the use of such areas must not interfere with the use of the public highway.
Reason
For reasons of highway safety.
11. There shall be no more than 991 car parking spaces provided on the site.
Reason
To ensure that there is no over provision of car parking on the site.
12. Not less than 70 secure covered cycle spaces and 35 secure covered motorcycle spaces shall be provided prior to the development being brought into use.
Reason
In order to promote travel to the site other than by the private motor car.
13. Visibility splays of 4.5*90 metres shall be provided and maintained at the emergency access onto Stanborough Road.
Reason
For reasons of highway safety.

Environment Agency Planning Informatives

Under the terms of the Water Resources Act 1991, the prior written consent of the Environment Agency is required for any discharge of sewage or trade effluent into controlled waters (e.g. watercourses and underground waters), and may be required for any discharge of surface water to such controlled waters or for any discharge of sewage or trade effluent from buildings or fixed plant into or onto ground or into waters which are not controlled waters. Such consent may be withheld.

Thames Water Informative
See attached extract

Approved Drawing Numbers – MARGARET/LIZA please see the attached schedule in relation to what the approved drawing numbers for this application are. (if in doubt speak to Russ/Matt)

REPORT TO THE CHIEF PLANNING AND ENVIRONMENTAL HEALTH OFFICER

N6/2003/0949/FP

Phased redevelopment of existing police authority headquarters involving partial demolition and construction of up to a total of 20,000 square metres of b1 office floor space, creation of new emergency access, extension and reconfiguration of existing car parking, relocation of existing telecommunications mast and aerials and comprehensive landscaping

POLICE HEADQUARTERS, STANBOROUGH ROAD, WELWYN GARDEN CITY

APPLICANT: HERTFORDSHIRE CONSTABULARY

(Hollybush Ward)

1.0 INTRODUCTION

- 1.1 The application was submitted on the 23rd June 2003 and envisages the redevelopment of the existing County Police Headquarters. The application is one which is being considered under delegated powers, because while the proposal is significant it complies with the policies contained in both the adopted District Plan Alterations Number 1, 1998 and also those contained in the Plan Review Revised Deposit Version June 2002.
- 1.2 The site itself is located in the north of the sailing lake at Stanborough Park. The site is bounded by the park to the south, Stanborough Road (A6129) to the west, Gosling Sports Park to the north and the East Coast Main Line to the east.
- 1.3 The existing buildings on the site predominantly occupy an elevated position on the north west corner. The current buildings are an accumulation of styles, sizes and designs of no particular architectural merit. Parking on the site currently provides severe difficulties for staff and visitors with operational vehicles intermingling with staff and visitor parking.
- 1.4 The main public view of the site is from Stanborough Road up through the existing access. The site on this boundary is a thickly hedged bank containing mainly native species which is bisected by the existing cycleway that links Welwyn Garden City Town Centre with Stanborough Lakes. Long distance views of the existing buildings on the site, some of which are up to four storeys in height, can be obtained from the Jack Oldings Roundabout. There are playing fields used by the police as well as a firing range which are located between the main developed portion of the site and the boundary of it with Stanborough Lakes.
- 1.5 The applicant has submitted a detailed planning and design statement that further elaborates on the application and this should be read in conjunction with the report on this application.

2.0 THE PROPOSAL

- 2.1 The planning application covers two phases of work which are proposed by the applicants and all of the work which is proposed is covered in this application. The proposal envisages the provision of a large number of additional parking spaces which are justified by the explicit operational requirements of the police, for example, in terms of the fact that the proposal effectively requires a doubling up in the parking provided on the site by virtue of the fact that a significant proportion of those travelling to the site and employed there will be arriving using their own vehicle and then doing their job using either police patrol vehicles or undercover vehicles which are kept at the site. The proposal anticipates the construction of some 20,000 square meters of mainly B1 office space and the provision of additional car parking facilities. The first phase of development includes the construction of a county wide operational support building (OSB) and the separation of the operational vehicles from the staff and visitor parking through the construction of additional on-site parking. The building itself would be some 13 metres in height, of a contemporary design and appearance with a domed roof. The materials include brick, render, glass and painted steelwork with a domed metal roof.
- 2.2 The first phase includes a new vehicular access to the site. The Constabulary is required to provide a secondary means of access to the site as part of Home Office requirements which also forms part of the first phase of development. This manifests itself in a new emergency access to be constructed to the south of the existing entrance that would access Stanborough Road by way of a cutting through the existing hedged bank.
- 2.3 The second phase of development anticipates the demolition and replacement of existing buildings to provide for a rationalisation of the existing office accommodation. The buildings within the second phase include three storey structures of up to 15 metres in height and would be of a similar design, appearance and materials as the OSB building. The proposal envisages the replacement of the existing 13,250 square metres of floorspace with the construction of a total of 20,000 square metres of new floorspace.
- 2.4 Two sizeable areas of buildings to the North of the site, including the skid pan, the vehicle workshops and the forensics department remain unaffected by this application.

3.0 PLANNING HISTORY

- 3.1 There have been a number of relatively minor applications for new buildings and the provision of new car parking at the site since the construction of the original buildings in 1969. However there have been no recent applications of note, or of this magnitude.

4.0 RELEVANT PLANNING POLICIES

- 4.1 Hertfordshire County Structure Plan 1998
Policy 25 Car Parking
Policy 46 Open Space within Towns
- 4.2 For the purpose of this report the advanced stage of the Welwyn Hatfield District Plan Review Revised Deposit Version June 2002 means that this development will be assessed using those policies and guidance. For the sake of completeness the policies of the Adopted Plan are stated at paragraph 4.3.

SD1	Sustainable Development
Resources Policies	
M1	Integrating Transport and Land Use
M4	Green Transport Plans
M6	Pedestrian Facilities
M7	Cycle Routes and Facilities
D1	Quality Of Design
D2	Character and Context
D3a	Design for Movement
D5	Design Statements
OS1	Urban open Land
M19	Parking Standards for New Development

Supplementary Design Guidance

Supplementary Planning Guidance produced in relation to Policy 25 of the Structure Plan

4.3 Welwyn Hatfield District Plan Alterations No 1 1998

BEV2

BEV3

BEV5

T3

T5

T15

GEN Criteria 1, 2 and 4

5.0 **REPRESENTATIONS RECEIVED**

- 5.1 The application was advertised by the direct notification of adjoining neighbours by letter, the display of a site notice and press notice.
- 5.2 The application was submitted with letters of support from the Chairman of Hertfordshire Police Authority, The Chief Constable of Hertfordshire and the Constabulary's Director of Support Services. These letters outline the necessity and rationale behind the planned new facilities and why the new buildings are required as part of a strategic review of policing in Hertfordshire.
- 5.3 No letters of support or objection have been received from persons or occupiers of commercial premises or residential property in the vicinity of the site.
- 5.4 The Environment Agency have no objection to the development subject to the application of a number of standard conditions.
- 5.5 Thames Water have similarly no objection subject to standard conditions.
- 5.6 Welwyn Garden City Society have not commented on the application.
- 5.7 Hertfordshire County Council as the Highway Authority have provided a detailed response to the application. The response raises no objection in principle to the application but in order to be acceptable to the Highway Authority a range of issues are required to be addressed and provided for within a Section 106 legal agreement and the response suggests a number of planning conditions should

the Local Planning Authority be minded to resolve to grant consent. In terms of contributions the S106 agreement would need to provide for £30,000 improvements to the cycle network and £18,000 to provide for two bus stops.

- 5.8 WHAG the Welwyn Hatfield Access Group have made their usual representations regarding compliance with the disabled access requirements of the District Plans.
- 5.9 National Air Traffic Services and the Civil Aviation Authority were also consulted principally regarding the proposed helipad. Neither organisation raised an objection but written confirmation has been obtained deleting this element from this application.

6.0 **APPRAISAL**

6.1 The planning issues presented by this application can be summarised as follows:

1. Firstly the physical impact of the proposed new development and its impact on the character and appearance of the area in terms of the design polices of the District Plan Review. Second in this section is the assessment as to whether or not sufficient consideration has been given with regard to the resources section of the plan for such issues as development on previously developed land, energy efficient buildings and water management.
2. The implications of the proposal on the land to the south of the existing buildings in the light of the recent urban open land designation (policy OS1) within the District Plan Review and the proposed associated enhancements to landscape and the biodiversity of the site.
3. The impact of the proposals on the existing highway network, compliance with the parking standards and the requirements of the Highway Authority in terms of off-site highway improvements, the requirements to provide a green travel plan and the phasing implications for construction and car parking. These requirements mainly stem from the movement section of the District Plan Review.

6.2 **Physical Impact and form of Development.**

The proposal envisages development in two principle phases:

This is firstly the construction of the Operational Support Building (OSB) and secondly the rationalisation of the existing office space and then the construction of the remaining buildings. The provision of car parking numbers and phasing will be dealt with under the highways section later within this report. The entire site lies within the urban area of Welwyn Garden City (which is excluded from the surrounding Green Belt) so there is no objection in principle to the application. The new car park to the South of the site does encroach onto the urban open land recently designated as part of the District Plan Review and I will refer to this aspect of the below.

- 6.3 The design statement makes clear that the buildings will be BREAMM assessed with the aim of reducing energy consumption and increasing their sustainable function wherever possible. I therefore see no reason to further question this aspect of the development. Turning to the physical impact of the development I would comment as follows. The buildings are of a contemporary modern design and construction with a combination of materials to be used as the site is seen in relative isolation from any local vernacular architecture that means that there is no real built form that is required or necessary to satisfy the character or context of the area. My main concerns are therefore the size and massing of the structures on the site. When seen from the nearest public viewpoint in Stanborough Road the site benefits from good screening because of the wide verge and bank through which the cycleway passes. In most places there are three belts of landscaping comprising of tall hedge and mature trees. In combination this means that there is little public view of the site other than through the existing vehicular access point. The other public views of the site are mainly from Stanborough Lakes and the Oldings roundabout. There are limited views from the Gosling Stadium to the north and the railway to the east but because of their restricted nature these are less of a concern.
- 6.4 The longer views of the site from Oldings Corner and Stanborough Lakes are important given that the application anticipates an increase in size and bulk of the buildings. The main reason that the existing development on the site is not particularly prominent appears to be the tree planting on a large bank in Stanborough Park. The elevated height of the bank and the mature trees serve to provide a partial screen to these views and this will help screen the additional buildings from these key views. The Council's Landscape advisor has given consideration to the strengthening of the planting on the bank but it is considered that this would be at a cost to the wind requirements of the sailing facility within Stanborough park whose management is extremely reluctant to accede to the request for further structural planting. It should be stressed at this point that the proposal in its final form would replace a diverse collection of buildings with a single over arching design ethos to the benefit of the character and distinctiveness of the area. Given the relative isolation of the site and therefore the lack of any relevant design context I see no reason to question the modernity of the design approach.
- 6.5 With regard to the repositioning of the radio mast at the site I am mindful that this provides a site sharing facility for mobile telephone operators as well as accommodating the police's communication requirements. The repositioning of the mast itself raises no real issues in terms of the physical appearance but the loss of the facility during the construction process may give rise to a number of temporary structures or even pressure for additional facilities outside the site boundary. Given the difficult nature of accommodating telecommunications operators within Welwyn Garden City my view is that a planning condition to any likely permission that ensured that the new mast be constructed and commissioned before the existing is demolished would be reasonable.
- 6.6 Having given due consideration to the issues as mentioned above I am of the opinion that the proposed buildings on the site will not be unduly prominent or dominant and that the justification provided within the Planning and Design Statement submitted with the application is sufficiently robust in terms of the design and performance of the individual buildings. Therefore my opinion is that the proposal is acceptable in terms of relevant design policies D1, D2, D3a, D5 and the relevant resources polices R1, R3, R9 of the District Plan Review.

6.7 Urban Open Land (UOL 127/128) and Landscape Ecology Considerations

The purpose of designating Urban Open Land is outlined under Policy OS1 of the District Plan Review. The main encroachment on this land envisaged by this proposal is the new car park area to the south of the site. This is a relatively discreet area of the site in term of the views of the public. My view is that as no actual buildings are anticipated in this area and that provided significant structural planting is provided in the area of the car park, as the applicants have indicated will be the case, the contribution of this area as a break to development in the urban area will be maintained and the integrity of the function of the land as urban open land will be protected.

6.8 The development of the site will be accompanied by a landscaping strategy that can be secured by relevant hard and soft landscaping conditions to any planning permission that may be granted. The Council's Landscape and Ecology section have had a preliminary input into the application and the applicant is fully aware of the Council's likely requirements with regard to these matters. It is anticipated that this landscaping strategy will reinforce the function of the UOL designation as mentioned above and introduce opportunities to improve the biodiversity of the site through the introduction of native species and hedgerow wildlife corridors. Therefore I believe that the proposal is compatible with policy OS1 (Urban Open Land), R14 (Trees, Woodlands and Hedgerows) and policy R 15 (Biodiversity and development) of the District Plan Review.

6.9 Highway and parking issues

Given that the built form of the application would meet the policies and design criteria of the Adopted and Revised District Plans and that the development can be successfully accommodated within the constraints provided by the Urban Open Land designations I will now turn to the highway issues. The County Council have made clear their requirements with regard to this application within a letter received on the 01/09/2003 to which I shall refer below. As mentioned previously the site lies on the periphery of the urban area of Welwyn Garden City and is served by pedestrian and cycle links to the town centre.

6.10 The approach of the Council to highway and associated transport issues is articulated within the movement section of the District Plan Review. This application raises one fundamental question when considering the highway issues associated with this application. This is with regard to compliance with the parking standards where I would comment as follows. The current parking situation on site could be best described as chaotic with operational vehicles intermingling with staff and visitor parking and with the appearance of little or no management of the car parking on site. The applicant proposes to separate out the operational parking of police vehicles from the parking requirements of the existing and proposed floor space of the site. Information has been supplied in confidence to the Council regarding the numbers and detail of the Policy HQ operational parking requirement and it is accepted that motor vehicles themselves would properly be considered to be an essential component of police operations.

6.11 I am therefore of the view that the number of operational vehicles at the site, some 279 vehicles, should not be included within the maximum number of parking spaces that would be generated by the existing and proposed floor space

in the light of the maximum parking standards identified by Supplementary Planning Guidance 25. The County Council as the Highway Authority support this view subject to the application of a planning condition limiting the total number of spaces to no more than 991 car parking spaces. In terms of implementation the development is proposed in two phases with the provision of the operational parking (279) and the additional parking for the first phase of development (162) and the reconstruction and rationalisation of the existing parking (398) to yield an initial first phase total of 839. 152 further parking spaces are to be provided following demolition and reconstruction anticipated by the second phase of development. The applicant is agreeable to the parking provision being linked to the phased provision of floor space by way of triggers in the section 106 agreement. The applicant has also indicated a willingness to introduce a car parking management plan as part of the S106 agreement to ensure that the operational, staff and visitor parking is operated efficiently and to attempt to avoid the current problems that exist on the site.

- 6.12 The County Council consider that the application will not have a negative impact on the capacity of the highway network and that there is no requirement for off-site highway improvements. The County require the imposition of a condition to provide and ensure the retention of a 4.5 * 90 metre visibility splay for the emergency access. The County also require the imposition of a planning condition to prevent construction works interfering with the public highway and the provision of 70 covered cycle spaces and 35 secure motorcycle spaces.
- 6.13 The County have made clear that the site needs to be more accessible to other modes of travel. To these ends there is a requirement for the applicant to fund two bus stops (£18,000) and make a contribution to the improvement of the cycle network (£30,000) and the applicant has agreed to these contributions. Furthermore the applicant will be required to develop a "Green Transport Plan" to develop and encourage the use of transport other than the private motor vehicle. The applicant is aware that the development of the GTP will be a component of the S106 agreement.
- 6.14 As mentioned above in 6.11 the development is anticipated in two distinct phases. It is considered that a construction method statement will be required as a condition to any planning permission that identifies areas for contractor's storage and accommodation and the temporary parking arrangements for all users of the site during the construction phases. The method statement will dovetail with the phasing provision of the car parking as required by the s106 agreement.
- 6.15 Subject to the appropriate planning conditions and the S106 agreement (in line with policy IM 2) I believe that the proposal complies with the main relevant Movement Policies M1, M3, M4, M5, M6, and M7 of the District Plan Review.

7.0 CONCLUSION

Having carefully considered the matter I am confident that the application can be successfully assimilated into the local built environment and will not adversely affect the character or appearance of the area. In this respect the application complies with policies contained within both the adopted District Plan and in the Plan Review together with the supplementary design guidance which accompanies the Plan Review. The proposals are substantial, but the site is peripheral to the town and as has been noted is well screened in terms of the

public views which can be gained of it. The proposal has an impact on the designated Urban Open Land but the essential function of it is unaffected by the proposal and with the benefit of additional landscaping it is the opinion of the LPA that the proposal will actually reinforce the function of the Urban Open Land.

8.0 RECOMMENDATION

8.1 It is recommend that planning application N6/2003/0949/FP be approved subject to the completion of a satisfactory Section 106 legal agreement to secure the following:

1. The provision of a commuted sum of £30,000 towards the improvement of cycleways in the vicinity of the site.
2. The provision of a commuted sum of £18,000 for the construction of two bus stops.
3. The provision of a construction plan or construction method statement that includes storage of construction materials, temporary parking and contractors parking during the construction phases.
4. The formulation, introduction and monitoring of a green travel plan for all users of the site.
5. To secure the implementation of a management plan in relation to the visitor, staff and operational parking.
6. To ensure that the car parking on the site is constructed in accordance with the phased implementation of additional floor space.

Subject to the satisfactory completion of the Section 106 Agreement I recommend that Application N6/2003/949/FP be approved subject to the following conditions:

1. SCO1 Standard Time Limit
2. SC19 Materials
3. No development shall take place until full details of both hard and soft landscape works and an implementation programme have been submitted to and approved in writing by the local planning authority. These works shall subsequently be carried out as approved. These details shall include proposed finished levels or contours; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials and lighting.

Soft landscape works shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate.

All hard and soft landscape works shall be carried out in accordance with the approved details. The works shall be carried out prior to the

occupation of any part of the development or in accordance with the programme agreed with the Local Planning Authority

Reason

In order to safeguard the appearance of the development, reinforce the function of Urban Open Land 128 and to improve the biodiversity of the site.

4. Development shall not commence until details of the on site drainage works have been submitted to, and approved by, the Local Planning Authority in consultation with the sewerage undertaker. No buildings authorised as a result of this permission shall be occupied until the on-site drainage works referred to above have been completed.

Reason

In order to ensure the provision of adequate sewerage capacity.

5. Surface water drainage works shall be carried out in accordance with details which shall have been submitted to and approved by the Local Planning Authority before development commences.

Reason

To prevent the increased risk of flooding.

6. Surface water source control measures shall be carried out in accordance with details which shall have been submitted to and approved by the Local Planning Authority before development commences.

Reason

To prevent the increased risk of flooding and to improve water quality.

7. Before the development is commenced, a detailed site investigation shall be carried out to establish whether the site is contaminated, to assess the degree and nature of the contamination present, and to determine its potential for pollution of the water environment. The method and extent of this site investigation shall be agreed with the Planning Authority prior to the commencement of the work. Details of appropriate measures to prevent pollution of groundwater and surface water, including provisions for monitoring shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall then proceed in strict accordance with the measures approved.

Reason

To prevent pollution of the water environment.

8. No soakaways shall be constructed in contaminated ground

Reason

To prevent pollution of groundwater

9. Prior to the removal or decommissioning of the existing telecommunications mast the replacement mast shall be made fully operational in the position indicated on drawing 5012542AA//0044203 Rev O unless the Local Planning Authority otherwise agrees in writing.

Reason

To avoid any unnecessary proliferation of permanent and temporary telecommunication structures and to comply with Policy BEV21 of the Welwyn Hatfield District Plan Alterations No. 1 1998.

10. All parking, delivery and storage areas associated with the construction of the development, including the access works must be provided on land which is not public highway and the use of such areas must not interfere with the use of the public highway.
Reason
For reasons of highway safety.
11. There shall be no more than 991 car parking spaces provided on the site.
Reason
To ensure that there is no over provision of car parking on the site.
12. Not less than 70 secure covered cycle spaces and 35 secure covered motorcycle spaces shall be provided prior to the development being brought into use.
Reason
In order to promote travel to the site other than by the private motor car.
13. Visibility splays of 4.5*90 metres shall be provided and maintained at the emergency access onto Stanborough Road.
Reason
For reasons of highway safety.

Environment Agency Planning Informatives

Under the terms of the Water Resources Act 1991, the prior written consent of the Environment Agency is required for any discharge of sewage or trade effluent into controlled waters (e.g. watercourses and underground waters), and may be required for any discharge of surface water to such controlled waters or for any discharge of sewage or trade effluent from buildings or fixed plant into or onto ground or into waters which are not controlled waters. Such consent may be withheld.

Thames Water Informative
See attached extract

Approved Drawing Numbers – MARGARET/LIZA please see the attached schedule in relation to what the approved drawing numbers for this application are. (if in doubt speak to Russ/Matt)

Surface Water Drainage

With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, this is the major contributor to sewer flooding. Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of our customers.

Hence, in the disposal of surface water, Thames Water will recommend that the Applicant

a) Looks to ensure that new connections to the public sewerage system do not pose an unacceptable threat of surcharge, flooding or pollution ;

b) check the proposals are in line with advice from the DETR, which encourages, wherever practicable, disposal 'on site' without recourse to the public sewerage system; for example in the form of soakaways or infiltration areas on free draining soils ;

c) looks to ensure the separation of foul and surface water sewerage on all new developments

Where disposal of surface water is other than to a public sewer, then the Applicant should ensure that approval for the discharge has been obtained from the appropriate authorities.

In respect with surface water, It is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving network e.g. through On/Off site storage.

Existing discharge levels should be honoured. If there is to be an increase in these levels, the developer needs to discuss this with Thames Water to ensure sufficient capacity exists within the catchment.

Morgan/
Liza,
please see
water -
continued.