



DEVELOPMENT MANAGEMENT COMMITTEE

Thursday, 7th January, 2016

7.30 pm

Town Hall

Publication date: 22 December 2015

CONTACT

If you require further information or you would like a copy of this agenda in another format, e.g. large print, please contact Ishbel Morren in Democracy and Governance on 01923 278375 or by email to legalanddemocratic@watford.gov.uk .

Welcome to this meeting. We hope you find these notes useful.

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SPEAKING AT DEVELOPMENT MANAGEMENT COMMITTEE

Only one person will be permitted to speak on behalf of objectors and one in support of a proposal. Precedence to speak in support of the proposal will be given to the applicant or their representative.

In order to speak, a person must register before 12 noon on the day of the meeting by contacting the Democratic Services Team. The contact details are available on the front of this agenda.

If a speaker wishes the Development Management Committee to consider any documentation at the meeting, then it must be submitted to the Democratic Services Team by 12 noon on the day of the meeting.

COMMITTEE MEMBERSHIP

Councillor R Martins (Chair)
Councillor G Derbyshire (Vice-Chair)
Councillors S Bashir, N Bell, S Johnson, I Sharpe, M Turmaine, M Whitman and
T Williams

AGENDA

PART A - OPEN TO THE PUBLIC

1. **APOLOGIES FOR ABSENCE/COMMITTEE MEMBERSHIP**
2. **DISCLOSURE OF INTERESTS (IF ANY)**
3. **MINUTES**

The minutes of the Development Management Committee held on 10 December 2015 to be submitted and signed.

Copies of the minutes of this meeting are usually available seven working days following the meeting.

All minutes are available on the Council's [website](#).

CONDUCT OF THE MEETING

The Committee to take items in the following order:

1. All items where people wish to speak to the Committee and have registered to do so by telephoning the Democratic Services Team.
 2. Any remaining items that the Committee agrees can be determined without further debate.
 3. Those applications where the Committee wishes to discuss matters in detail.
4. **15/01300/OUTM WARNER BROS. STUDIOS LEAVESDEN, WARNER DRIVE, LEAVESDEN** (Pages 5 - 106)

Hybrid application to include full planning permission for sound stages, workshops, post production facility and extension to the studio tour car park, together with outline planning permission for extension to the studio tour, workshops, production support building, studio parking deck, studio cafe extension, studio support facilities and associated works.

(Duplicate application to Three Rivers District Council)

5. **15/01539/FULM 36, CLARENDON ROAD** (Pages 107 - 136)

Erection of six storey building to provide 2,746 sqm of office (Class B1a) floorspace and 107sqm of floorspace for Class B1a/A2/A5 floorspace with associated car parking, cycle and bin storage and landscaping.

6. 12/01263/EXT 35-37 MARLBOROUGH ROAD, WATFORD (Pages 137 - 144)

Application to modify Section 106 planning obligations pursuant to planning permission 12/01263/EXT.

7. 15/01160/ADV WATFORD MARKET, WATFORD HOUSE LANE (Pages 145 - 162)

Application to install 11 advertising panels with market graphics above the containers in the existing market.

Agenda Item 4

PART A	
Report of: DEVELOPMENT MANAGEMENT SECTION HEAD	
Date of Committee:	7th January 2016
Site Address:	Warner Bros. Studios Leavesden, Warner Drive, Leavesden
Reference Number:	15/01300/OUTM
Description of Development:	Hybrid Application to include full planning permission for sound stages, workshops, post production facility and extension to the Studio Tour car park together with outline planning permission (matters reserved: appearance and landscaping) for extension to the Studio Tour, workshops, production support building, Studio parking deck, Studio cafe extension, Studio support facilities and associated works. (Duplicate application to Three Rivers District Council).
Applicant:	Warner Bros. Studios Leavesden
Date Received:	10th September 2015
13 week date (major):	10th December 2015 (extended to 29th January 2016)
Ward:	Woodside

1.0 SITE AND SURROUNDINGS

- 1.1 The site lies immediately to the north of Watford just within the M25 and north of Hunton Bridge M25 spur roundabout. The residential area of Leavesden is to the

east, with Abbots Langley to the north and Watford to the south. To the west of the site are open fields with some residential roads and individual properties.

- 1.2 Leavesden Studios has been used for film making since the mid 1990s and from 2000 by Warner Bros. for the Harry Potter series of films, amongst others. The Studios comprise the main part of the original Leavesden Aerodrome dating back to the 1930s and operated from 1967 to 1994 when the site was occupied by Rolls Royce for aero engine manufacture.
- 1.3 Unlike previous applications, the current application includes the Island Site. This is a separate parcel of land to the south east of the main Studios site which essentially forms a triangle between Aerodrome Way, Ashfields and Gadeside. It is also owned by Warner Bros. The total application site area is approximately 69 hectares.
- 1.4 The majority of the site lies within Three Rivers District. The only parts of the site within Watford Borough are the southern part of the Island Site (2.14 hectares) and a strip of land along the northern side of North Western Avenue/Gadeside (5.7 hectares).

2.0 PROPOSED DEVELOPMENT

- 2.1 The current proposal is a hybrid planning application for new sound stages, workshops, post production facility, Studio Tour extension and associated car park extension, production support building, Studio parking deck, Studio café extension, Studio support facilities and associated works with some elements in detail and some in outline (access, layout and scale to be determined with appearance and landscaping reserved matters) associated with the continued use of the land and buildings for film production and associated activities (including use of Stages J & K for the storage and public exhibition of film sets and artefacts (Studio Tour) and hospitality events).

2.2 The various detailed and outline elements proposed under this application are listed below, identifying which elements are within Watford Borough and which are within Three Rivers District:

Detailed elements:

1. L Stage Workshop (7,033 sqm) located adjacent to existing L Stage in the south-west corner of the site. This would comprise up to 10 self-contained workshop units and would replace existing temporary workshop structures at the backlot. It would be approximately 160m long and 30m wide. The roof would be pitched with a ridge height of 10.3m. (WBC and TRDC)
2. P Stage (3,693 sqm) located on the northern part of the site, opposite N & O and M Stages. This area is wooded in part but also includes a boiler house and storage buildings. This would be a new permanent sound stage. The Stage would be approximately 78m x 44m. It would have the appearance of a hanger building (similar to M Stage) with a maximum height of 22m and straw and grey coloured cladding. (TRDC)
3. Q and R Stages and ancillary production offices (6,173 sqm) within a new permanent sound stage with three storey offices attached to the northern elevation. This would be sited to the west of C Stage. The Stage would be approximately 78m x 44.5m, with the attached offices 73m x 11.2m. It would have the appearance of a hanger building with a maximum height of 19m and straw and grey coloured cladding. (TRDC)
4. Post production facility (6,271 sqm) to the south of the main Studio buildings. This would include re-recording stages, cutting rooms and a preview theatre. It would have an overall width of 55m and maximum depth of 72m. The roof would be predominantly flat and staggered in height, with the highest element being 16m. Materials would consist of brick, steel profiled sheeting and glazing. (TRDC)
5. Studio Tour Extension Car Park to the south of the Studio Tour buildings. The existing bunding in this area would be levelled. The extension would provide an additional 503 visitor car parking spaces resulting in a total of 1,350 spaces. 24 coach / minibus parking spaces are also to be provided. Access

would branch off the existing mini roundabout along the existing access road, with a new toilet building proposed adjacent. (TRDC)

Only the southern half of the L Stage Workshop, which straddles the borough boundary, is within Watford Borough.

Outline elements:

6. Studio Tour Extension (13,935 sqm). This new stage would extend from the southern elevations of J & K Stages onto part of the existing visitor car park. It would have a maximum height of 21m. This extension would also include additional single storey staff accommodation located around K Stage, with a maximum height of 10m. It is intended that Studio Tour will be designed to accommodate a maximum of 9,000 visitors per day. (TRDC)
7. Workshop (4,134 sqm) on an existing hardstanding area to the north of the site, known as Car Park 5 (CP5). This would be up to 11m in height. (TRDC)
8. Studio Café Extension (743 sqm) to meet enhanced catering needs. Materials would match the existing building (brick and aluminium glazed). It would be single storey and up to 8m high. (TRDC)
9. Production Support Building (3,234 sqm) adjacent to the backlot and proposed Q & R Stages, to be used for arrange of support activities including workshop, wardrobe, make-up and special effects. It would be up to 19m in height. (TRDC)
10. Studio Parking Deck (10,940 sqm) to be constructed on the existing surface level Studios car park, providing approximately 2,250 car parking spaces for staff. This would have a maximum of 5 levels and maximum height of 16m. Access is to be as per the existing car park. (TRDC)
11. Island Site development (Studio Support, 18,580 sqm). This would provide accommodation for a range of Studio support facilities such as workshops and production services together with supporting office accommodation. The maximum height of development would be 15m (amended from 18m). 480 car parking spaces are proposed and access would be via a new arm on the

existing Aerodrome Way/High Road/Ashfields Way signalised junction. (WBC and TRDC)

Only the southern half of the Island Site, which straddles the borough boundary, is within Watford Borough. This includes the proposed new access junction on Aerodrome Way.

2.3 The proposal also includes a Landscape Planting Strategy. Substantial new planting is proposed along the western edge of the backlot, to the south of the L Stage Workshop and in and around the Studio Tour car park extension.

2.4 The application is accompanied by the following supporting information:

- Planning, Design and Access Statement
- Landscape and Visual Appraisal
- Flood Risk Assessment and Drainage Strategy
- Arboricultural Appraisal
- Earthworks Strategy
- Economic and Social Assessment
- Ecological Appraisal and Management Plan
- Contamination Assessment
- Acoustic Appraisal
- Planning Policy Analysis
- Heritage Statement
- Transport Assessment
- Sustainability and Waste Management Strategy
- C-Plan Energy Statement and Sustainability Checklist (TRDC)
- Local Biodiversity Checklist
- Section 106 Heads of Terms
- CIL form
- EIA Screening Request

2.5 Additional information has been received as part of the application process, including technical highways reports and additional flood risk / drainage information. Amended plans have also been submitted showing amendments to P Stage and landscaping as well as a reduction in the height (and thus floorspace) of the buildings on the Island Site.

3.0 RELEVANT PLANNING HISTORY

3.1 The site has been subject to numerous planning permissions over the past 20 years in relation to its temporary and permanent use as film studios. Many of these permissions relate only to Three Rivers District. The main planning permission covering the permanent use of the site for film studios and the Harry Potter Studio Tour is:

3.2 10/00051/FUL (TRDC ref. 10/0080/FUL) - Continued use of land and buildings for film production and associated activities including retention and refurbishment of existing studios to accommodate stages, backlot, workshops, offices, production facilities, canteen /commissary and ancillary studio facilities and services, replacement and extended workshops, stage and offices. Two new stages (approx. 13,000 sqm floorspace) for the storage and public exhibition of film sets and artefacts (including cafe and gift shop), new accesses from Aerodrome Way, revised internal road layout and parking, extended backlot, landscaping and associated works. Approved with a S106 Agreement. This consent has been implemented.

3.3 The various consents granted by Watford Council and Three Rivers District Council covering the whole site permit the following development and uses:

- i) The continued use of the land and buildings for film production and associated activities including the retention and refurbishment of existing studio buildings.
- ii) Erection of a replacement 'Mill' building and new workshop building to the

northern part of the site.

- iii) Erection of two new stages (J and K) for the storage and public exhibition of film sets and artefacts, including cafe and gift shop, located between the main studio complex and Aerodrome Way. These new stages house the 'Warner Bros. Studio Tour London: The Making of Harry Potter', and have since been extended.
- iv) Two new accesses from Aerodrome Way, with cessation of the previous access onto South Way.
- v) Revised internal road layout and parking, new gatehouses, extended backlot, landscaping including new bunding and associated works.
- vi) Consent for an external water tank used to film water based scenes.
- vii) Construction of additional workshops, two new sound stages and production offices (M, N and O).
- viii) Additional Studio Tour and Studio parking
- ix) Studio Tour hospitality events

3.4 Three Rivers District Council considered an application relating to the majority of the site that falls within their District on 10th December 2015 for the following:

15/1852/FUL - Hybrid Application to include detailed approval of new sound stages, workshops, post production facility and extension to the Studio Tour car park together with outline approval (matters reserved: appearance and landscaping) of extension to the Studio Tour, workshops, production support building, Studio parking deck, Studio cafe extension, Studio support facilities and associated works as well as continued use of land and buildings for film production and associated activities (including use of Stages J & K for the storage and public exhibition of film sets and artefacts (Studio Tour) and hospitality events).

A resolution was made to grant conditional planning permission subject to completion of a Section 106 Agreement, referral to the National Planning Casework Unit (representing the Secretary of State for Communities and Local Government) and amendments to various conditions. The Secretary of State has confirmed that he does not wish to call in the application for his own determination and Three Rivers District Council can proceed to grant conditional planning

permission.

4.0 PLANNING POLICIES

Development plan

4.1 In accordance with s.38 of the Planning and Compulsory Purchase Act 2004, the Development Plan for Watford comprises:

- (a) *Watford Local Plan Core Strategy 2006-31*;
- (b) the continuing “saved” policies of the *Watford District Plan 2000*;
- (c) the *Hertfordshire Waste Core Strategy and Development Management Policies Document 2011-2026*; and
- (d) the *Hertfordshire Minerals Local Plan Review 2002-2016*.

4.2 The *Watford Local Plan Core Strategy 2006-31* was adopted in January 2013. The *Core Strategy* policies, together with the “saved policies” of the *Watford District Plan 2000* (adopted December 2003), constitute the “development plan” policies which, together with any relevant policies from the County Council’s *Waste Core Strategy* and the *Minerals Local Plan*, must be afforded considerable weight in decision making on planning applications. The following policies are relevant to this application.

4.3 Watford Local Plan Core Strategy 2006-31

- WBC1 Presumption in favour of sustainable development
- SS1 Spatial Strategy
- SD1 Sustainable Design
- SD2 Water and Wastewater
- SD3 Climate Change
- SD4 Waste
- EMP1 Economic Development
- EMP2 Employment Land
- T2 Location of New Development

- T3 Improving Accessibility
- T4 Transport Assessments
- T5 Providing New Infrastructure
- INF1 Infrastructure Delivery and Planning Obligations
- UD1 Delivering High Quality Design
- GI1 Green Infrastructure
- GI2 Green Belt
- GI3 Biodiversity

4.4 **Watford District Plan 2000**

- SE7 Waste Storage, Recovery and Recycling in New Development
- SE24 Unstable and Contaminated Land
- SE27 Flood Prevention
- SE28 Groundwater Quality
- SE36 Replacement Trees and Hedgerows
- SE37 Protection of Trees, Woodlands and Hedgerows
- SE39 Tree and Hedgerow Provision in New Development
- SE40 Landscape Character Assessment
- T10 Cycle Parking Standards
- T21 Access and Servicing
- T22 Car Parking Standards
- E2 Employment Use Outside Identified Employment Areas
- E5 Environmental Considerations

4.5 **Hertfordshire Waste Core Strategy and Development Management Policies Document 2011-2026**

No relevant policies.

- 1 Strategy for the Provision of Waste Management Facilities
- 2 Waste Prevention and Reduction
- 12 Sustainable Design, Construction and Demolition

4.6 **Hertfordshire Minerals Local Plan Review 2002-2016**

No relevant policies.

4.7 Supplementary Planning Documents

The following Supplementary Planning Documents are relevant to the determination of this application, and must be taken into account as a material planning consideration.

4.8 *Watford Character of Area Study*

The Watford Character of area Study was adopted in December 2011. It is a spatial study of the Borough based on broad historical character types. The study sets out the characteristics of each individual character area in the Borough, including green spaces. It is capable of constituting a material consideration in the determination of relevant planning applications.

4.9 National Planning Policy Framework

The National Planning Policy Framework sets out the Government's planning policies for England. The following provisions are relevant to the determination of this application, and must be taken into account as a material planning consideration:

Achieving sustainable development

The presumption in favour of sustainable development

Core planning principles

Section 1 Building a strong, competitive economy

Section 4 Promoting sustainable transport

Section 7 Requiring good design

Section 9 Protecting Green Belt land

Section 10 Meeting the challenge of climate change, flooding and coastal change

Section 11 Conserving and enhancing the natural environment

Decision taking

5.0 CONSULTATIONS

5.1 Neighbour consultations

Notification letters were sent to 433 properties within Watford Borough.

One letter of reply has been received. This raises an objection to the multi-storey decked car park proposed at the main entrance to the studio site and is an element of the scheme that is solely within Three Rivers District.

5.2 **Statutory publicity**

The application was publicised by 6 site notices posted within Watford Borough on 18 September 2015 and by advertisement in the Watford Observer published on 18 September 2015. The site notice period expired on 09 October 2015 and the newspaper advertisement period expired on 09 October 2015.

5.3 **Technical consultations**

The following responses have been received from technical consultees. Only those comments relevant to the elements of the scheme within Watford Borough have been included. More extensive comments have been received by Three Rivers District.

5.3.1 Environment Agency

The submitted Contaminated Land Assessment (prepared by: Ramboll Environ; dated: 7 September 2015; reference: UK11-21699, issue: 4) shows that further investigation of the stockpile areas is required. The site is located in Source Protection Zone 2, therefore these proposals need to be dealt with in a way which protects the underlying groundwater.

We are currently operating with a significantly reduced resource in our Groundwater and Contaminated Land Team in Hertfordshire and North London Area. This has regrettably affected our ability to respond to Local Planning Authorities for some planning consultations. We are not providing specific advice on the risks to controlled waters for this site as we need to concentrate our local resources on the highest risk proposals.

We recommend however that the requirements of the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG) are still 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. This should be additional to the risk to human health that your Environmental Health Department will be looking at.

We expect reports and Risk Assessments to be prepared in line with our 'Groundwater protection: Principles and practice' document (commonly referred to as GP3) and CLR11 (Model Procedures for the Management of Land Contamination).

In order to protect groundwater quality from further deterioration:

- No infiltration based sustainable drainage systems should be constructed on land affected by contamination as contaminants can remobilise and cause groundwater pollution.
- Piling or any other foundation designs using penetrative methods should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution.

5.3.2 Herts. County Council - Lead Local Flood Authority

Initial comments:

In the absence of an acceptable FRA we object to the grant of planning permission and recommend refusal on this basis for the following reasons:

The FRA carried out by Quattro Consult reference 4302 dated September 2015 submitted with this application does not comply with the requirements set out in the Planning Practice Guide (as revised 6 April 2015) to the National Planning Policy Framework. The submitted FRA does not therefore provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

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

1. Justification of the implementation of SuDS measures, giving priority to above ground attenuation techniques and source control
2. Provide a minimum of 2 SuDS treatment stages prior to the final discharge point into the River Gade
3. Demonstration of the feasibility of infiltration measures through undertaking BRE Digest 365 testing
4. Overall drainage strategy to outline overall final discharge rates and volumes and how each part of the development site attenuates to achieve the overall discharge rate and volumes from the development site.
5. Location of existing SuDS measures, which of these measures is to be upgraded and which SuDS measures will remaining confirming their capacity and condition.
6. Consideration of the EA National Surface Water Flood Maps

Whilst we appreciate that the applicant is proposing a reduction in existing run-off rates, it is not clear what this rate is intended to be for the entire redevelopment of the site to understand how each part of the development contributes towards the reduction of this overall discharge rate. This also includes the overall required storage volume to be achieved to meet the overall discharge rate. It is stated that a rate of 6.5/s/ha will be provided, however elsewhere in the FRA it refers to a rate of 5l/s. The applicant should clarify which rate is being proposed and whether this rate relates to each part of the site that is being put forward for development or the overall discharge rate at the discharge point into the River Gade.

Whilst it is mentioned in the FRA that the use of permeable paving will be provided, it is unclear where this is located on the drainage plans, how large these areas are and what areas the permeable paving will be catering for in relation to surface water run-off. We acknowledge that permeable paving provides a source control treatment stage for the part of the site they are proposed, however as stated in our previous response, there should be an implementation of a minimum of 2 SuDS treatment stages. Petrol interceptors and trapped gullies are not considered as part of the SuDS treatment train and priority should be given to providing above ground storage keeping the water at the surface and within the site for as long as possible

to provide attenuation, water quality and biodiversity benefits. Please refer to the SuDS Guide for Hertfordshire for more information (see link below).

The use of attenuation tanks should be considered as a last resort where it has been demonstrated all other SuDS options have been considered and discounted for technical reasons only. Tanks lie at the bottom of the SuDS hierarchy as they do not offer any additional benefits and require increased maintenance and placed underground.

It is mentioned in the FRA that infiltration tests have been undertaken, however the results of these have not been provided and an assumed rate has been provided within the FRA. It is also stated that if it should be found that infiltration is not possible, contractors could provide an attenuation tank instead during construction. This is not an acceptable approach; the feasibility of a drainage scheme should be established at the outset, allowing sufficient space, optimum opportunities for betterment and other opportunities to be achieved prior to planning permission. Infiltration tests should be carried out in accordance with BRE Digest 365 to demonstrate if the method of infiltration is feasible and allow any proposed SuDS measures to be designed and sized correctly at the outset. Alternatively if the infiltration tests cannot be provided up front a scheme based on attenuation giving priority to above ground solutions should be provided.

As this is a hybrid application, an overall drainage scheme should be provided indicating on a plan which areas of the site are for full planning and which is for outline. Those that are seeking full planning permission will require a full detailed drainage scheme for each part of the site. For those covered under the outline planning part of the site, a conceptual drainage scheme should be provided based on feasible principles and outline how the drainage for each outline site will achieve the overall proposed surface water run-off rate and volume discharging into the River Gade. Each part of the site should be annotated with the required volume and discharge rate for that part of the site or where it will be providing a feasible infiltration measure based on BRE Digest 365 tests.

It is stated in the FRA that there is an intention to maintain some of the existing drainage infrastructure but some of this may be upgraded during construction. This should be clearly marked on a plan where these changes will be made and how it relates to the overall drainage scheme and confirmation that the existing/ upgraded drainage pipe network can cater for the design rainfall event. There should be no flooding from the pipe network below and up to the 1 in 30 year event. Where there is flooding from the system above this event, these areas should be clearly shown on a site plan, showing the extent of flooding and depth of flooding, ensuring that it can be contained within the site for up to the 1 in 100 year climate change event.

Any existing SuDS within the areas of re-development to be maintained should be able to cater for the design rainfall event. If it is shown they cannot perform to current standards, these SuDS should be identified on a plan and proposals to upgrade or implement additional SuDS within that part of the site should be provided to ensure they can perform for the development's lifetime and provide the required discharge rate and volume prior to discharge into the River Gade.

The FRA refers to flood risk from other sources, however there is no consideration of the EA National Surface Water Flood Maps. These maps provide an indication of the potential risk of flooding from surface water and therefore should be assessed further as part of this FRA and demonstrate that any areas at high to medium risk of flooding can be managed within the site and not increase flood risk elsewhere.

Comments (05/11/15) following receipt of additional information:

Based on the additional information received from Quattro Consult contained within a letter dated 16 October 2015 and associated appendices, we can confirm that we maintain our objection. The following information should be provided to demonstrate the proposed drainage scheme is feasible and the development will not increase flood risk to the site and the surrounding area;

1. Assessment of potential flood risk from surface water based on the EA National Surface Water Flood Maps
2. Justification of the proposal to increase surface water overflow run-off rates.

3. Detailed drainage information including surface water drainage calculations for those sites being developed under full planning permission
4. Outline drainage calculations for those sites being developed under outline planning permission including

Overcoming our objection:

1. We previously required the applicant to take into account existing flood risk from surface water as indicated on the EA National Surface Water Flood Maps. We cannot find any evidence in the latest information that this has been assessed.
2. Based on the summary overflow calculations which we understand will only occur above the 1 in 100 year + climate change rainfall event, this shows an increase in an overflow rate from 303 l/s to 481/s, please explain why there is an increase when all areas being developed are restricting the flow to pre-development greenfield run-off rates which will eventually flow into the River Gade.
3. Drawing 1184-PL-1011 provides details on which parts of the development site will be permitted under full planning permission. We provide a response based on each of those areas and outline the information required (*selected comments given*):

L – Stage (drawing 4315-005-L) - Please provide full detailed drainage calculations for all SuDS features and pipe-runs demonstrating the proposed drainage can cater for all rainfall events up to and including the 1 in 100 year + 20% for climate change event.

4. Drawing 1184-PL-1011 provides details on which parts of the development site will be permitted under outline planning permission. We provide a response based on each of those areas and outline the information required:

Island Site (drawing 4302-ISL-002 Conceptual) - We note the intention to utilise permeable paving for the whole car park site, please provide outline drainage calculations for all SuDS features and pipe-runs demonstrating the proposed drainage can cater for all rainfall events up to and including the 1 in 100 year + 20% for climate change event.

Informative to the LPA:

The proposed drawing scheme is intending to utilise downstream flow defenders and other underground engineering solutions. The products are not considered as 'treatment' stages within the hierarchy of best practice SuDS. The LPA will need to satisfy itself that the discharge from the development site into the River Gade will not have any detrimental impact to the water quality and ecological status of the River Gade in line with the Water Framework Directive.

The LPA will also need to satisfy itself that the proposed drainage scheme can be adopted and maintained for its lifetime.

Final comments (23/11/15) following further clarification:

Based on the additional information received from Quattro Consult, we can confirm that the information provided in the letter dated 12 November 2015 and associated attachments; 4315-005-RevA, App A EA Flood Map, App Bi 4302-CP-005, App Bii 4302-PP-005, App Biii 4302-QR-002 and App Biv 4302-TE-004 Rev C in support of the planning application now satisfies the concerns raised in our letter dated 05 November 2015.

We acknowledge that the proposals will provide a betterment to existing surface water run-off rates by proving pre-development overflow greenfield run-off rates for events above the 1 in 100 year + climate change and infiltration for rainfall events below the 1 in 100 year + climate change.

We therefore recommend the following conditions to the Local Planning Authority should planning permission be granted:

LLFA position:

The proposed development will only meet the requirements of the NPPF if the following measure(s) as detailed in the following documents, which have been submitted with this application are implemented and secured by way of a planning condition on any planning permission.

- FRA carried out by Quattro Consult reference 4302 dated September 2015 and attached appendices.
- Quattro Consulting letter dated 12 November 2015
- Amended drawings 4315-005-RevA, App A EA Flood Map, App Bi 4302-CP-005, App Bii 4302-PP-005, App Biii 4302-QR-002 and App Biv 4302-TE-004 Rev C

Condition 1 - Areas of development with full planning permission:

The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment carried out by Quattro Consult reference 4302 dated September 2015, Quattro Consulting letter dated 12 November 2015, 4315-005-RevA, App A EA Flood Map, App Bi 4302-CP-005, App Bii 4302-PP-005, App Biii 4302-QR-002 and App Biv 4302-TE-004 Rev C and the following mitigation measures detailed within the FRA:

1. Limiting the surface water run-off generated by the 1 in 100 year + climate change critical storm so that it will not exceed the run-off from the undeveloped site and not increase the risk of flooding off-site.
2. Providing infiltration where possible through the use of infiltration trenches
3. Limiting any surface water overflow into the existing piped drainage system above the 1 in 100 year + climate change event to pre-development greenfield run-off rate of 5l/s.

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied

within the scheme, or within any other period as may subsequently be agreed, in writing, by the Local Planning Authority.

Reason: To prevent flooding by ensuring the satisfactory storage of and disposal of surface water from the site.

The proposed development will be acceptable if a planning condition is included requiring the following drainage details.

Condition 2- Areas of development with outline planning permission:

No development shall take place until a surface water drainage scheme for the site, based on the principles set out in the FRA carried out by Quattro Consult reference 4302 dated September 2015, Quattro Consulting Letter dated 12 November 2015 and attached appendices, sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the local planning authority. The drainage strategy should demonstrate the surface water run-off generated up to and including the 1 in 100 years plus climate change critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

The scheme shall also include:

1. Detailed drainage plan to confirm final drainage design and location of proposed SuDS features and pipe-runs.
2. Detailed surface water drainage calculations for all rainfall events up to and including the 1 in 100 year + climate change event
3. Undertake final infiltration tests prior to the installation of the infiltration trenches to confirm infiltration rates

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

5.3.3 Thames Water

Amended comments following receipt of additional information:

Waste Comments: With the information provided, Thames Water has been unable to determine the waste water infrastructure needs of this application. Should the Local Planning Authority look to approve the application ahead of further information being provided, we request that the following 'Grampian Style' condition be applied - "Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed". Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community.

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 a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

5.3.4 Highways England

Initial comments:

Our view is that the proposed development may result in severe harm to the M1 Motorway. We need further information from the applicant to establish whether this is the case. The information we require is: Traffic Impact Assessment of the M1 Junction 6.

In order to sufficiently assess the proposed development's impact upon the Strategic Road Network (SRN), we require a traffic impact assessment of the development on this junction, The Transport Assessment has provided flows at the Leavesden Green Interchange and sufficient vehicles (79 in the 2022 PM peak) are heading north along the A405 to warrant further investigation on the potential impact on M1 Junction 6. Therefore, we would ask the applicant to look further at the junction and provide a traffic impact analysis through to full occupation in 2022. Additionally, we would ask the applicant to compare the overall forecast demand to the ability of the existing network to accommodate traffic over a period up to ten years after the date of registration of the planning application.

Further comments (19/11/15) following receipt of M1 Traffic Impact Assessment:

We have reviewed the Technical Note providing an assessment of M1 Junction 6. In the development traffic flows 2022 PM peak scenario (figure 8) it is shown that 72 Passenger Car Units (PCU) are travelling north along the A405 North Orbital Road towards M25 J21a. These flows are sufficient to warrant further investigation on the potential impact on M25 Junction 21a, this assessment should consider the ability to accommodate traffic over a period of 10 years after the date of registration of the planning application. Highways England have recent surveys, an existing ARCADY and future LINSIG model that can be made available to support the assessment.

Final comments (10/12/15) following receipt of impact assessment on M25 Junction 21a:

In the transport assessment work provided, the applicant's consultant outlined the development will generate an additional 76 Passenger Car Units in the PM peak that will access M25 Junction 21a.

The development is split into 11 plots, two of which (6 and 11 – Studio Tours Extension and the Island Site) have an impact of 31 and 21 vehicles in the PM peak. As a result of the trips generated, the performance of Junction 21a will be

adversely affected. It is therefore considered that mitigation at Junction 21a will be necessary for Plots 6 and 11.

Modelling has also been undertaken on a scheme shown on drawing no. 11012495/PHL/01 Rev B (planning application at St Albans District Council – SADC/5/2009/0708) which highlights that sufficient mitigation could be provided at J21a, however, as yet has not been committed. Therefore, before commencement of either plots 6 or 11, Highways England will require an assessment to be carried out and should the assessment identify the need for mitigation, a contribution will be required to be paid towards the mitigation of the impact of the assessment scheme on the capacity of M25 Junction 21a.

Notice is hereby given that Highways England's formal recommendation is that we recommend that conditions should be attached to any planning permission that may be granted (*only 1 condition is requested*):

“No development of Plots 6 or 11 (Studio Tours Extension or the Island Site) shall take place until an assessment has been carried out of the capacity at M25 Junction 21a having regard to the illustrative drawing no. referenced 11012495/PHL/01 Rev B (planning application SADC/5/2009/0708) and such assessment has been submitted to and approved in writing by the Local Planning Authority, in consultation with Highways England. Should the assessment identify the need for mitigation, a contribution will be required to be paid towards the mitigation of the impact of the assessed scheme on the capacity of M25 Junction 21a.

Reason: To ensure that the M25 Junction 21a is designed and constructed to the appropriate standards enabling the junction to continue to be an effective part of the Strategic Road Network in accordance with Circular 02/2013: The Strategic Road Network and the Delivery of Sustainable Development.”

5.3.5 Herts. County Council – Highways Authority

Initial comments:

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

- A traffic impact assessment of the M1 Junction 6 through to full occupation in 2022 is required. Highways England have also requested the applicant to compare the overall forecast demand to the ability of the existing network to accommodate traffic over a period up to ten years after the date of registration of the planning application;
- Collision data is necessary for the surrounding network and also for the existing access arrangements;
- Existing trip generation data needs to be revised to consider the morning peak Studio Tour Visitors;
- Junction modelling needs to consider the revised morning trip generation;
- Further information on the internal layout of the proposed car parking arrangements is required including a swept path analysis for the proposed parking areas; and
- A Stage 1 Safety Audit is required for the proposed junction improvement for the Ashfields/ Aerodrome Way/ High Road signalised junction in order to ensure problems are resolved at an early stage in the design process.
- Further justification is required for visitor trip distribution.

Both a Transport Assessment (TA) and a Design and Access Statement have been submitted with the application. This level of assessment is consistent with the guidance provided in Roads in Hertfordshire highway design guide 3rd edition.

Road safety:

The TA does not provide any assessment of incident data within the vicinity of the site or at key junctions.

Existing trip generation:

The TA has provided information on surveys for a number of junctions in the surrounding area which were undertaken in April 2014. The applicant has undertaken a review of the change in traffic flows as a result of the proposals. The junctions are listed below in their respective Borough:

Watford:

- Leavesden Green Interchange grade separated junction: operating within capacity
- Ashfields/ Courtland Drive/ North West Avenue roundabout: exceeds capacity
- Ashfields/Aerodrome Way/ High Road signalised junction: operating within capacity

Three Rivers:

- A41/Bridge Road/ Langleybury Lane signalised junction: operating within capacity
- Langley Lane/ South Way/Aerodrome Way/Abbey Drive roundabout junction: operating within capacity
- Aerodrome Way/ Hill Farm Avenue signalised junction: operating within capacity
- Aerodrome Way/ Hercules Way signalised junction: operating within capacity
- Aerodrome Way/ Warner Drive/ Hercules Way - northern access roundabout: operating within capacity
- Aerodrome Way/ Studio Tour Drive/ Dowding Way- southern access roundabout: operating within capacity

Each of the above junctions has been modelled using either LINSIG or ARCADY and the observed 2014 traffic flows. The junction models are based on those used in the original TA supporting the Studio or those within the TA that supported the more recently consented residential development to the north of the site.

Table 3.9 of the TA presents the data for the Ashfields / Courtland Drive / North West Avenue roundabout for 2014 (WBC). The North West Avenue arm presents a

Ratio of Flow to Capacity (RFC) of 0.99 in the am peak and a RFC of 1.06 in the evening peak. Additionally, the Ashfields arm presents a RFC of 0.87 in the evening peak. Courtland Drive presents a RFC of 1.08 in the am peak and 1.1 RFC in the pm peak. Therefore, the roundabout is already over capacity and exceeding the standard threshold of 0.85 RFC. As stated above all other junctions were operating within capacity based on 2014 traffic flows.

Proposed trip generation:

The TA has quantified the trip generation individually for each of the land uses for the proposal:

- General Studios Staff
- Studios Tour Staff
- Studio Tour Visitors

General Studios Staff Trip Generation (Located in both Three Rivers and Watford):

The applicant has derived trip rates for the proposal from the trip generation from the existing use on site. This is deemed appropriate as there are no comparable sites in the TRICS database and is consistent with the approach used in the original TA. To obtain a trip rate for the Studios, the applicant has taken observed entry/exit flows at the site access and divided these by the studio floor space at the time of the survey to obtain a typical trip rate per 100sqm GFA. The surveys of the site access point were undertaken in 2012 when the existing floor space on site was 55,169sqm.

These rates have then been applied to the proposed land uses based on the increase in floor area of 30,538sqm at the Studios and 18,580sqm at the Island Site. However, the TA states that the Studios floor area is reduced to account for the fact that the L Stage Workshop is replacing existing workshops which are currently operational, meaning a net increase in studio floor area of 23,505sqm. The trip generation set out in the TA stated that the general studio staff trip rate would result in a trip rate per 100sqm of 0.178 into the site and 0.056 out of the site in the morning peak generation. The results for the evening peak indicated a trip

rate per 100sqm of 0.054 into the site and 0.520 out. The total anticipated trips for the studio staff was 99 two way trips in the AM peak and 242 trips in the evening peak.

Studio Tour Staff (Located in Three Rivers):

The TA includes an estimate of staff numbers associated with the Studio Tour and their anticipated shift pattern. Table 5.2 of the TA states that there will be a total of 78 studio tour employees. The TA states that based on this information the original TA formulated a trip rate per employee along with the anticipated number of Studio Tour staff trips assuming a pro-rata increase (57%) in staff for the proposed Studio Tour expansion. The studio staff trip rate was 0.050 into the site and 0.003 out of the site in the AM peak. The results for the PM peak indicated a studio staff trip rate of 0.003 into the site and 0.050 out of the site. The results presented in the TA indicated 19 studio staff trips into the site and 1 trip out in the morning peak. The evening peak results were 1 trip into the site and 19 out of the site.

Studio Tour Visitors (Located in Three Rivers):

The TA states that there is a daily maximum limit of 5,728 visitors per day on a normal weekday. The TA states that the current Studio Tour operates on the basis of pre-booked tickets for specific time-slots. The TA states that at present tours are limited to a maximum of 131 visitors per tour, with each tour starting at 12 minute intervals from 10am, with the site closing at 10pm. However, current information displayed on the Warner Bros Studio Tour website indicates that tours can start at 9am. Therefore, further justification is required before HCC can consider this trip rate to be appropriate. The TA states the extended Studio Tour will result in additional visitor numbers at the Studio. These will be set at a maximum of 9,000 visitors per day, a 57% increase. Opening hours and tour intervals will remain unchanged. On this basis, there would be a pro-rata increase to a maximum of 206 visitors per tour and approximately 1,030 per hour, an increase of 375 visitors.

Total Trip Generation for Proposals: Based on the above trip generation the proposal will generate a total morning peak two way vehicle movement of 119 and a total two way evening peak vehicle movements of 396. However, as stated above

the morning peak data provided for the Studio Tour Visitors is inaccurate and therefore the applicant will need to revise the trip generation to consider tours starting at 9am or provide further justification.

Traffic growth:

The TA states that the development is anticipated to be fully occupied by 2022, but some parts of the proposals will be completed and occupied before this. To account for any growth in background traffic that may occur between 2014 and the relevant assessment years the TA applies a growth factor to the 2014 observed traffic. The TA states that National Traffic Model (NTM) growth factors, adjusted using TEMPRO local growth factors, have been applied to the observed 2014 traffic flows. These are indicated as:

2014 - 2017: morning peak 1.003, evening peak 1.034

2014 - 2018: morning peak 1.047, evening peak 1.049

2014 - 2019: morning peak 1.066, evening peak 1.063

2014 - 2022: morning peak 1.103, evening peak 1.107

Committed developments:

The TA includes the estimated traffic flows for the committed development of north of the site for the introduction of 425 residential units, ancillary retail, café and community space, which is currently being delivered but which was not fully occupied at the time of the traffic surveys. The current TA states that the original TA that was produced in support of the planning application for this development proposal has been reviewed and the morning and evening peak traffic movements have been extracted. The TA notes that construction was well under way and a number of dwellings were occupied at the time the surveys were undertaken including the full traffic flows from the residential TA.

Trip distribution:

The TA states that trip distribution onto the local highway network has been based on observed turning movements which were recorded in the April 2014 traffic surveys. This is considered a reasonable assumption for staff trip distribution. However, further justification is required for visitor trip distribution as they are likely to come from a wider catchment, as stated in the previous 2010 TA.

Junction modeling:

The TA sets out the impact of the development proposals on the capacity of the local highway network adjacent to the site, using junction models that were included within the original TA to support the original application or, for the Aerodrome Way signal junctions with Hill Farm Avenue and Hercules Way, those included in the TA which supported the residential development to the north. The assessment considered the impact of the proposals on a weekday. The TA states that this is when background traffic flows during the traditional morning and evening peak hours are at their highest. However, due to the land use of the proposal the weekends are likely generate the high trip rates and should also be included in the assessment.

The 2014 surveys covered the following junctions and are listed below in the respective Borough.

Watford:

Hunton Bridge (M25 J19) roundabout: This junction was not reviewed as the proposed trip generation was compared against the baseline traffic flows and did not produce a greater than 5% increase for any arm of the junction.

Ashfields/ Aerodrome Way/High Road signalised junction: Exceeds capacity

Ashfields/ Courtland Drive/ North West Avenue roundabout: Exceeds capacity

Leavesden Green Interchange grade separated junction: Operating within capacity

A41/ A412 The Dome roundabout: This junction was not reviewed as the proposed trip generation was compared against the baseline traffic flows and did not produce a greater than 5% increase for any arm of the junction.

Three Rivers:

A41/Bridge Road/ Langleybury Lane signalised junction: Operating within capacity
Langley Lane/ South Way/ Aerodrome Way/ Abbey Drive roundabout: Operates within capacity in the 2022 Without Development evening peak but exceeds capacity in the 2022 With Development evening peak with 0.87 RFC on the Aerodrome Way arm.

Aerodrome Way/ Hill Farm Avenue signalised junction: Operating within capacity

Aerodrome Way/ Warner Drive/ Hercules Way - northern access roundabout:

Operating within capacity

Aerodrome Way/ Studio Tour Drive/ Dowding Way- southern access roundabout:

Operating within capacity

These junctions were modelled to 2022. However, the TA has not consistently modelled both morning and evening peak for all the junctions. For example, the Langley Lane/ South Way/ Aerodrome Way/ Abbey Drive roundabout junction is only modelled for the evening peak. As stated above the Warner Bros Studio Tour website states that tours can begin as early as 9am. Therefore, the TA should take into account morning peak periods for all junction modelling.

The TA states that for Aerodrome Way for 2022 Without Development evening peak will have an RFC of 0.83 which will increase to an RFC of 0.87 in the 2022 With Development evening peak. This exceeds the 0.85 RFC threshold.

Ashfields/ Aerodrome Way/ High Road Signalised Junction:

As noted above, the TA presents the 2019 traffic flow with the existing junction layout with a degree of saturation in excess of 90% in both peak periods, with and without development traffic. The performance in the evening peak is materially worse than in the morning, with degrees of saturation well in excess of 100%. For example table 6.9 of the TA states the following degree of saturation traffic flows for the evening peak without development:

Ashfields Ahead Right Left: 113.5%

Aerodrome Way Left Ahead Right: 111.9%

High Road Right Left Ahead: 113.3

Table 6.9 of the TA states the following degree of saturation traffic flows for the evening peak with development:

Ashfields Ahead Right Left: 119.1%

Aerodrome Way Left Ahead Right: 118.5%

High Road Right Left Ahead: 117.5%

The addition of development traffic will make the performance of the junction in both peaks worse. As such, the applicant proposes to introduce improvements to the junction to offset the impact of the development in 2019. This is shown in drawing 14-041-002 which includes the following measures to increase capacity at the junction:

Ashfields - Increase flare length to 90m

Aerodrome Way - Introduction of a left turn/ ahead lane of 120m

High Road - Increase flare length to 50m

The junction improvements are deemed achievable in principle. However, a Stage 1 Road Safety Audit is required to resolve any potential safety problems at an early stage in the design process.

The results presented in table 6.10 of the TA indicate that the result the proposed improvements results in the junction with the development in place performing better than in the 2019 baseline scenario without the improvements.

Table 6.11 of the TA presents the 2022 traffic flows of the junction with improvements and states that the proposed layout operates within capacity with the additional development traffic during the morning peak periods but during the evening peak degrees of saturation (DoS) in excess of 90% with the DoS% of each arm ranging between 98.9% and 101.7%. This is an improvement to the baseline traffic without improvements.

Ashfields/ Courtlands Drive/ North West Avenue:

The TA states that the Ashfields/ Courtlands Drive/ North West Avenue junction operates over capacity during the 2022 baseline scenario without development, with North West Avenue and Courtlands Drive having RFCs over 0.85. Table 6.13 of the TA states the following traffic flows for the 2022 without development in the evening peak:

Ashfields: 0.80 RFC

Courtlands Drive: 1.08 RFC

North West Avenue: 0.99 RFC

The TA states that the following traffic flows for the above junction for the 2022 with development peak:

Ashfields: 0.87 RFC

Courtlands Drive: 1.1 RFC

North West Avenue: 1.06 RFC

Site Access:

Access to the various facilities is taken from two existing roundabout junctions on Aerodrome Way (in Three Rivers), with the southern junction providing access to the Studio Tour via Studio Tour Drive and the northern junction providing access to the production areas via Warner Drive. The TA does not include an assessment of the existing accesses. However, the two roundabout junctions on Aerodrome Way were modelled as part of the previous TA. The results from this analysis indicated that the (then proposed) accesses would function well within capacity. However, as stated earlier the applicant will need to provide incident data. This information is required for the site access to ensure that the intensification of its use does not impact on the road safety of the existing access arrangement.

Internal Layout:

The applicant has not provided any detailed information on the internal layout of the development proposals. In order to assess the proposals the applicant will need to

provide a swept path analysis for each proposed car park to justify there is sufficient manoeuvring space for standard vehicles, tour bus vehicles as well as service and delivery vehicles.

As part of the proposed studio tour car park (located on the west of Studio Tour Drive) the TA states that access will be taken from a new arm of the internal roundabout junction, immediately opposite the access to the existing visitor car park. However, no further information is provided in the TA on the design of the proposed internal junction. Therefore, the feasibility of the internal layout cannot be assessed.

The applicant also needs to provide justification that the internal layout for all the proposals provides a safe access for pedestrians when they are travelling from their car to the pedestrian access whilst walking through the car park. As such, further information is required to demonstrate that these proposals are designed in accordance with Hertfordshire County Council's highway design guide Roads in Hertfordshire.

Parking:

The applicant proposes a significant amount of additional parking as part of the development. The proposed parking arrangements are located in Watford and Three Rivers. The parking arrangements for both council areas are as follows:

Watford:

- L Stage Workshop: 20 - 30 parking spaces
- Island Site (studio support): 480 parking spaces.

Three Rivers:

- P Stage: 20 parking spaces
- Q and R Stages and production offices: 20 spaces
- Post Production Facility: Studio Parking Deck

Studio Tour surface car park: 1350 total (existing + proposed, an increase of 503 spaces)

Studio Tour extension: Studio Tour surface car park

Studio café extension: Studio parking deck

Production support building: Studio parking deck

Studio parking deck: 2,250 (including replacement of lost surface car parking)

The TA does not specify the percentage of disabled parking to be provided to the proposed car parks. Additionally, the TA does not include any swept path analysis of the proposed car parks. Therefore, the layouts of the proposed car parks cannot be assessed.

The TA also states that a total of 24 bus/ coach parking spaces are to be provided as part of the re-designed Studio Tour car park. However, more information on the layout is required to determine the feasibility of the parking arrangement.

The parking provision for the development will be required to adhere to the standards set out in the Watford Borough Council Local Plan and the Three Rivers Local Plan and it will be the responsibility of the appropriate LPA to determine the appropriateness of the level of parking provided. However, HCC will require further information to determine the safety and feasibility of the parking layout.

Studio and Studio Tour Cycle Parking:

The TA states that cycle parking provision for the non-tour elements of the development proposal will be provided at 1 space per 500 sqm of GFA provided.

The TA states that cycle parking for the Tour extension will meet the requirements of local planning policy.

It will be for WBC and TRDC to determine the appropriateness of the level of cycle parking provided. However, HCC will require further information as to the dimensions and details of the stands to ensure all spaces are suitable and usable

but this can be secured via condition. It should be noted that all cycle store doors should either slide or open inwards.

Accessibility:

Rail Services:

Watford Junction station is 3km southwest of the site and Kings Langley station is 2.5km to the north.

Bus Services:

Existing public bus services run past the site frontage along Aerodrome Way, providing access to and from Watford and neighbouring residential areas. Other services can be accessed by South Way or Leavesden High Road and Ashfields, and these form part of the extensive Watford local bus network.

A local company, Mullanys Coaches, operates a regular shuttle bus to take visitors to the Studio Tour to and from Watford Junction station to encourage its visitors to travel by public transport rather than by private car. The TA states that approximately 25% of visitors to the Studio Tour take the Mullanys shuttle bus and a further 25% come by private bus or coach. As the new proposals are an extension of an existing use, the site already has a bus service and existing pedestrian and cycle facilities that can be utilised and expanded on. The applicant has stated that a Travel Plan is already in place for the existing Studios and Studio Tour and this will be expanded to cover the proposed additional uses.

Cycle Accessibility:

In terms of local cycle infrastructure, TRDC classify the road network and cycle routes according to a Cycle Skills Network Audit, with Level 1 routes being accessible to all levels of cycle ability and Level 3 routes being accessible to advanced cyclists only. Aerodrome Way as it passes the site frontage is classified as a Level 3 road, however off-street cycle routes running parallel with Aerodrome Way are suitable facilities for all levels of cyclist and thus mitigate this road classification. Similarly, off-street routes and road routes through quieter residential

estates satisfy east-west demand, thereby mitigating the barrier that the A405 has to safe cycle movements

Pedestrian Accessibility:

All pedestrian routes to and from the site and the surrounding residential areas consist of lit footways, with pedestrian crossing facilities incorporated into the majority of the signal controlled junctions within close proximity of the site, including the Aerodrome Way junctions with Ashfields, the Leavesden Park access and Hill Farm Avenue. North of the Studio Tour roundabout access north/ south pedestrian movements are accommodated adjacent to the eastern kerb line within a shared use pedestrian/ cycle facility, for which there are crossing facilities at the site access junctions. South of the Studio Tour roundabout access there are shared use footway/cycleways adjacent to the site boundary. There is also a facility along the western boundary to the Island Site, with tactile paving on the splitter islands at the roundabout junction to accommodate crossing movements between these two locations. A shared use facility also exists on the eastern side of the Island Site, adjacent to Ashfields, which terminates at the signalised junction with Aerodrome Way, forcing pedestrians and cyclists to an alternative provision along the eastern side of the carriageway using the signalised crossings.

The accessibility of the site is considered acceptable. However, due to the size of the development a Travel Plan is required in alignment with the expansion.

Servicing and Deliveries:

A servicing area is to be provided to the rear of the extended Studio Tour. The TA states that each of the other elements of the development proposals will be accessible by service vehicles. However, the applicant has not provided a swept path analysis to justify this is feasible. This is required to ensure that the required sites within the proposal are able to accommodate for service, refuse and delivery vehicles.

Travel Plan:

The TA states that a Travel Plan is already in place for the existing Studios and Studio Tour and this will be expanded to cover the proposed additional uses. The updated Travel Plan will need to be developed in accordance with HCC Guidance.

Construction Management:

The TA states that a Construction Environmental Management Plan will be submitted at an appropriate time to support each of the master plan proposals. This will be designed to minimise disturbance during construction and will be adhered to throughout the construction period. The plan will set out hours of working; ensure that construction and delivery vehicles are routed away from residential roads and will ensure that wheel-washing facilities are provided on site. A Construction Logistics Plan should therefore be secured via a Section 106 Agreement.

Comments (19/11/15) following submission of M1 Junction 6 Traffic Impact Assessment and additional Technical Note to cover the additional information requested:

M1 Junction 6:

HCC requested a traffic impact assessment of the M1 Junction 6 through to full occupation in 2022. Highways England also requested the applicant to compare the overall forecast demand to the ability of the existing network to accommodate traffic over a period up to ten years after the date of registration of the planning application. The applicant has submitted a technical note to address this request.

The technical note identifies that the AM peak increase in two-way traffic flow on the A405 south of Junction 6 as a result of development is 10 PCU's which is below the threshold required for a junction capacity assessment to be undertaken. As such, the applicant has not undertaken further analysis of the impact in the AM peak and HCC consider this to be acceptable.

The technical note states that the PM peak increase in two-way traffic flow on the A405 south of Junction 6 (as a result of development) is 99 PCU's and therefore the applicant has undertaken further assessment for the PM peak.

The technical note states that the PM peak increases on the M1 slip roads are all below 30 PCU's and therefore no merge / diverge assessments have been undertaken. Of the two junctions between the A405 and M1 slip road links only the junction with the M1 northbound slip roads experiences an increase in flow of more than 30 PCU's and this has therefore been assessed using ARCADY.

The ARCADY model indicates that under all scenarios tested (2014 and 2022 and 2025 with and without development) the junction operates with RFC's less than 0.85. Table 1 of the Technical Note states the following junction performance for the A405 / M1 Northbound Slip Road Link:

- A405 North: RFC 0.26
- A406 South: RFC 0.67
- M1 Slip Link: RFC 0.81

The above is considered reasonable justification that the development would not have a severe adverse impact on the M1 J6. However, the applicant will need to consult directly with Highways England to ensure that the above analysis is acceptable to Highways England.

Collision Data:

The applicant has provided incident data for the time period July 1st 2010 to June 30th 2015. However, the data recorded in the TA only identifies incidences that occurred on Aerodrome Way, in which there was a total of 24 collisions, 3 were of serious injury and the rest were of slight injury.

However, considering the size of the proposal and the observed turning movements recorded in the April 2014 traffic surveys, further information is required on the nearby surrounding network.

The applicant will need to provide a more robust assessment of the incidences within the surrounding network to determine if the likely trips to be generated by the development will impact on highway safety. The collision data should be obtained for the network consistent with the trip distribution determined in the TA and support documents for both visitor and staff movements.

Morning Peak Trip Generation:

Previously comments provided by HCC requested further justification on the morning peak trip generation due to the TA not taking into account tours starting at 9.00am.

The additional information provided by the applicant states that tours will commence at 9am during school holidays, agreed floating days (maximum of 15 days per year) and Saturdays. The applicant states that floating days are a maximum of 15 days per year and can only be days that are both within five working days of any school holiday and not in consecutive sequence of more than 5 such days.

The applicant has provided a Transport Statement (TS) produced by SKM in 2012 which provides further details on the extended opening hours. As stated in the TS the applicant has undertaken directional traffic counts on the road network surrounding the site during a school holiday period and on a Saturday.

The TS states that the traffic generation observed for the Studio Tour between 09:00 and 10:00 was added to the 08:00-09:00 observed holiday and Saturday flows. These flows were then compared to the with development traffic flows for the AM peak period from the Transport Assessment that supported the original planning application. This demonstrated that the traffic flows between 08:00 and 09:00 during school holidays and on Saturdays with the Studio Tour starting at 9am were lower than those considered in the original Transport Assessment. This is considered acceptable for Saturdays and Public Holidays. However, the applicant

will also need to assess the AM peak trip generation for weekdays as there will be up to 15 floating days per year which could have tours starting from 09:00am. This will also need to be included in the AM peak junction capacity assessment to ensure that a worst case scenario has been reviewed.

Internal Layout and Vehicle Swept Paths:

As stated in the TA applicant proposes a significant amount of additional parking as part of the development which will cross over both WBC and TRBC boundaries. The parking arrangements for both Boroughs are as follows:

Watford Borough Council:

- L Stage Workshop: 20 – 30 parking spaces
- Island Site (studio support): 480 parking spaces.

Three Rivers District Council:

- P Stage: 20 parking spaces
- Q and R Stages and production offices: 20 spaces
- Post Production Facility: Studio Parking Deck
- Studio Tour surface car park: 1350 total (existing + proposed, an increase of 503 spaces)
- Studio Tour extension: Studio Tour surface car park
- Studio café extension: Studio parking deck
- Production support building: Studio parking deck
- Studio parking deck: 2,250 (including replacement of lost surface car parking)

As part of previous correspondence HCC requested vehicle swept path information. The applicant has stated that it is not the intention that any of the internal road network within the site be adopted. It will remain private and under the control of the Studios. The applicant has provided additional information on the parking areas which are accessible to the public.

The applicant has not undertaken a swept path analysis for all of the proposed Studio Tour car parking. However, Drawing No 14-041-005 shows the dimensions of car parking spaces and car park aisles. The drawing details that that all aisles are at least 6m wide and all car parking spaces are at least 2.4m wide by 4.8m long, this is consistent with the standards set out in Manual for Streets (Department for Transport, 2007).

Drawing No. 14-041-003 shows the swept paths of a 15m long coach entering and exiting the coach parking spaces in the designated coach parking area. The drawing also demonstrates that a 15m coach can undertake a three point turn in the area at the end of the coach park. This is considered acceptable.

Drawing No 14-041-004 shows the swept paths of a 15m long coach using the access route to enter and exit from the coach park and a 12m long bus using the bus stop facility that will replace the existing stops after the implementation of the Studio Tour Extension. This is considered acceptable.

The additional information does not specify the percentage of disabled parking to be provided to the proposed car parks. The parking provision for the development will be required to adhere to the standards set out in the Watford Borough Council Local Plan and the Three Rivers Local Plan and it will be the responsibility of the appropriate LPA to determine the appropriateness of the level of parking provided. However, the applicant will need to provide the dimensions and location of the disabled parking to ensure it can be accommodated within the proposed parking layout.

Road Safety Audit:

HCC previously stated Stage 1 Safety Audit is required for the proposed junction improvement for the Ashfields / Aerodrome Way / High Road signalised junction in order to ensure problems are resolved at an early stage in the design process. The applicant has stated that a Stage 1 Road Safety Audit of the layout changes

proposed in Drawing No 14-014-002 has been commissioned and will be provided as soon as possible. It is assumed that this is a spelling error and the applicant is referring to drawing 14-041-002 which is referred to in the TA. However, as previously mentioned before HCC can formally comment on the junction improvements the RSA is required.

Visitor Trip Distribution:

HCC previously commented on the visitor trip distribution and states that trip distribution onto the local highway network has been based on observed turning movements which were recorded in the April 2014 traffic surveys. This is considered a reasonable assumption for staff trip distribution. However, HCC requested further justification for visitor trip distribution as they are likely to come from a wider catchment, as stated in the previous 2010 Transport Assessment.

The applicant has provided further justification on the visitor trip distribution stating that when the 2010 TA was submitted there was no visitor facilities at the site and therefore the visitor trip distribution were not based on observations. As the Studio Tour is now open, the applicant has based the visitor trip distribution on observation from the turning movements at the Tour site access. This is considered reasonable justification for determining visitor trip generation and is consistent with the approach taken for determining staff trip distribution.

The below results state the existing capacity results for the highest capacity arm of each junction.

- A41/Bridge Road/Langleybury Lane signalised junction: DoS 73%
- Langley Lane/South Way/Aerodrome Way/Abbey Drive roundabout junction: RFC 0.72
- Aerodrome Way/Hill Farm Avenue signalised junction: DoS 75.1%
- Aerodrome Way/Hercules Way signalised junction: DoS 64.8%

- Aerodrome Way/Warner Drive/Hercules Way – northern access roundabout: RFC 0.45
- Aerodrome Way/Studio Tour Drive/Dowding Way – southern access roundabout: RFC 0.49
- Ashfields/Aerodrome Way/High Road signalised junction: DoS 99.3%
- Ashfields/Courtland Drive/North West Ave roundabout: RFC 1.1
- Leavesden Green Interchange grade separated junction: RFC 0.82

Each of the above junctions have been modelled using LINSIG and ARCADY and the observed 2014 traffic flows. The data from the TA states that the Ashfields / Aerodrome Way signals and the Ashfields / Courtlands Drive / North West Avenue Roundabout exceed capacity under existing traffic flows.

The applicant has stated that no mitigation measures will be applied to the Ashfields/Courtlands Drive/ North West Avenue Roundabout. However, data presented in the TA indicates that the junction operates over capacity in the 2022 baseline scenario. It is predicted that the proposed development will result in the following increase in the 2022 with development scenario for this junction:

- Ashfields will increase from 0.80 RFC to 0.87 RFC
- North West Avenue will increase from 0.99 RFC to 1.06 RFC
- Courtlands Drive will increase from 1.08 RFC to 1.1 RFC

The increase in queue lengths over the junction as a whole will take the queues at this junctions to unacceptable levels. Therefore, HCC is likely to seek that the applicant provide mitigation measures in the form of an updated Travel Plan developed in accordance with HCC Guidance, to ensure that queues do not exceed the baseline queue lengths and the degree of saturation is taken to the baseline.

The Travel Plan should also set out the programme of measures and how the allocated money is to be spent also including a monitoring and penalties programme.

A monitoring fee will be agreed and secured through a Section 106 agreement; this will be paid to HCC to cover the costs of using the monitoring system and for monitoring the output data.

Summary:

- The applicant will need to consult directly with Highways England to ensure that the above analysis on the M1 J6 is acceptable to Highways England.
- The applicant will need to provide a more robust assessment of the incidences within the surrounding network to determine if the likely trips to be generated by the development will impact on highway safety.
- The applicant will also need to assess the AM peak trip generation for tours starting at 9:00am for standard weekdays, as there will be up to 15 floating days per year which could have tours starting from 09:00am. This will also need to be included in the AM peak junction capacity assessment to ensure that a worst case scenario has been reviewed.
- The swept path analysis and details on the internal parking layout are deemed reasonable. However, further information is required on the location of disabled parking within the site.
- The justification for visitor trip distribution is considered reasonable.
- HCC is likely to seek that the applicant provide mitigation measures for the Ashfields/Courtlands Drive/ North West Avenue roundabout in the form of an updated Travel Plan developed in accordance with HCC Guidance, to ensure that queues do not exceed the baseline queue lengths and the degree of saturation is taken to the baseline.

Final comments (24/11/15) following further submission of further information:

The comments below address the additional information provided by the applicant to overcome the above concerns.

M1 Junction 6:

HCC previously requested that the applicant consult directly with Highways England to ensure that the analysis on the M1 J6 is acceptable to Highways England.

Highway England have since stated that the development traffic flows presented in the TA warrant further investigation on the potential impact on M25 Junction 21a, this assessment should consider the ability to accommodate traffic over a period of 10 years after the date of registration of the planning application. Highways England have recent surveys, an existing ARCADY and future LINSIG model that can be made available to support the assessment. The applicant has stated that they have contacted Highways England for this information and it is currently being obtained.

HCC do not wish to comment further on this matter.

Collision Data:

The applicant previously provided data for the following locations:

- Langley Lane/South Way/Aerodrome Way/Abbey Drive
- Aerodrome Way/Hill Farm Avenue
- Aerodrome Way/Hercules Way
- Aerodrome Way/Warner Drive/Hercules Way
- Aerodrome Way/Studio Tour Drive/Dowding Way
- Ashfields/Aerodrome Way/High Road
- Ashfields / Courtland Drive / North West Avenue

The data provided by the applicant for the above junctions was considered acceptable. However, due to the size of the proposal HCC requested that the applicant provide a more robust assessment of the incidences within the surrounding network consistent with the assessed junctions and the trip distribution.

The applicant has since provided the below additional collision data:

- A41 Watford Road / Langlebury Lane Signals: There were a total of 8 accidents at this junction in the 5 year period covered, 6 of which resulted in slight injuries and 2 serious injuries. There were no fatalities.
- Leavesden Green Interchange: There were a total of 18 accidents at this junction in the 5 year period covered, 17 slight and 1 serious. There were no fatalities.
- M1 J6: There were a total of 48 accidents recorded at this junction, five serious and 43 slight. There were no fatalities.
- M25 J21a Roundabout: A total of 30 accidents over the 5 year period, 2 serious and 28 slight. There were no fatalities.

The additional data is considered acceptable and does not indicate any road safety issues due to highway layout.

Morning Peak Trip Generation:

Previously comments provided by HCC requested further justification on the morning peak trip generation due to the TA not taking into account tours starting at 9.00am.

The applicant has since stated that as this is an operational matter which can be controlled by condition, they have agreed that rather than undertaking the analysis work required now, they will deal with this as part of the Reserved Matters submission for the Tour extension. If the analysis indicates a problem, then the applicant has stated they would accept a condition that prohibits the Tour extension opening before 10am. HCC consider this acceptable.

Disabled parking:

HCC previous requested further information on the location of disabled parking within the site. The applicant has submitted an additional plan (drawing: 1241/SC/001) which details the location of the disabled parking. This is considered acceptable.

Road Safety Audit:

As part of the HCC's original comments a Road Safety Audit was requested to support the proposed junction improvements for the Ashfields/Aerodrome Way/High Road signalised junction in order to ensure problems are resolved at an early stage in the design process.

A Stage 1 Road Safety Audit has been submitted (reference Q30119/RSA/09). Nine problems have been raised and are summarised below:

1. Illustrative Master Plan shows site access route as being short and therefore there is potential for queuing on the short access resulting in driver frustration.
2. Absence of pedestrian phase on exit from junction into Ashfields (east)
3. Swept path assessment not provided.
4. Continuity of cycle routes
5. Two lane southbound merge on exit it two short
6. Southbound vehicles in the junction may strike the central island of the east arm.
7. Provision of short length of cycle lane on left turn lane from Ashfields.
8. Aerodrome Way southbound approach to junction late lane changing by drivers increasing risk of sideswipe collisions
9. Ashfields northbound approach to the junction late lane changing by drivers increasing risk of sideswipe collisions

A designer's response has been provided to address these issues. The responses are considered acceptable and matters can be dealt with at the detailed design stage.

Summary:

The additional information submitted by the applicant addresses the concerns raised by HCC. Therefore, HCC has no objections to the proposed development.

However, as previously stated, HCC is likely to seek that the applicant provide mitigation measures for the Ashfields/Courtlands Drive/ North West Avenue roundabout in the form of an updated Travel Plan developed in accordance with HCC Guidance, to ensure that queues do not exceed the baseline queue lengths and the degree of saturation is taken to the baseline.

Additionally, the applicant will need to ensure that the issues raised by Highways England are addressed.

Section 278 Agreement:

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

Section 106 Agreement:

A S106 Agreement will be required to secure any Construction and Logistics Plan Planning Obligations.

Section 38 Agreement:

Any internal roads that are intended to be adopted by HCC should be designed in accordance with the RiH and subject to a S38 Agreement.

5.3.6 Herts. County Council - Archaeology

Initial comments:

Please note that the following advice is based on the policies contained in the NPPF.

The site covers a large area formerly part of RAF Leavesden and a WWII aircraft factory (Historic Environment Record: 9041). An Iron Age and Roman settlement (Historic Environment Record: 10048) was recorded immediately east of the site during the construction of a housing estate.

The site has already been subject to several phases of archaeological work. A trial trench evaluation in 2000 (Cotswold Archaeological Trust) recorded archaeological features along the eastern edge, centre and southern areas of the site. Subsequent strip map and record work (Cotswold Archaeology) identified part of a potential enclosure in the centre of the site and isolated features of pre-historic date. Historic building recording was also undertaken and recent geophysical survey results (Richardson 2015 – Stratascan) from an area in the southern part of the site were interpreted as modern services.

The Heritage Statement that accompanies the application (Trehy & Davenport, 2015 – Terrance O'Rourke Ltd) suggests that further archaeological work is unwarranted due to the results of previous work, however the following should be considered further, in relation to the 'Areas' detailed in the application:

Area 1: (*L Stage Workshop*) Has not been subject to archaeological work and lies some distance from previous work towards the River Gade;

Area 2: Lies outside of any areas previously investigated on the site and superficially appears undisturbed, being close to, but outside of the main confines of the aircraft factory buildings or any recent development. The Historic Building Report (Davenport & Leung, Cotswold Archaeology, 2011) mentions buildings on this part of the site which were related to the aircraft factory (possibly munitions and armaments stores) that were not properly identified or recorded during the survey;

Area 3, 4 & 9: Are adjacent to areas opened during trial trenching and the strip map and sample, which produced pre-historic features and finds including a possible enclosure ditch (Haines, Cotswold Archaeology, 2011);

Area 5: The north-eastern half of this lies in an area of archaeological potential as identified in the 2000 evaluation (Cotswold Archaeological Trust) and the supplied Heritage Statement;

Area 11: (*Island Site*) Has been the subject of a geophysical survey which recorded modern services and areas of made ground. The results should be tested by trial trench evaluation to ensure reliability as advised by Heritage England in their advice document, Geophysical Survey in Archaeological Field Evaluation (2008, EH)

Given the general potential for the site and the results of previous archaeological work, the proposed development is likely to have an impact on heritage assets. I would recommend that the following provisions be made, should you be minded to grant consent:

1. a) The archaeological recording of any historic standing structures affected by this proposal (or example those in Area 2) in their present form, *before* any demolition/conversion/development commences. Furthermore, any original features/equipment to be altered, demolished, or removed as part of the proposed development should also be recorded. The resultant archive should then be deposited at an appropriate location in order to form a long-term record.
- b) The archaeological monitoring and recording any ground disturbance associated with the demolition of the buildings eg floors, foundations, service trenches etc (also including a contingency for the preservation or further investigation of any remains then encountered).
2. An archaeological trial trench evaluation of Areas 1, 2, 3, 4, 9 and 11 *before* any development commences and to inform further mitigation.
3. An archaeological strip, map and sample of the north-eastern half of Area 5, but not including the runway area, *before* any development commences.
4. Such appropriate mitigation measures indicated as necessary by the evaluation. This may include:
 - a) the preservation of any remains *in situ*, if warranted,

- b) appropriate archaeological excavation of any remains before any development commences on the site, with provisions for subsequent analysis and publication of results,
- c) archaeological monitoring of the groundworks of the development (also including a contingency for the preservation or further investigation of any remains then encountered),
- d) and such other provisions as may be necessary to protect the archaeological interests of the site.

I believe that these recommendations are both reasonable and necessary to provide properly for the likely archaeological implications of this development proposal. I further believe that these recommendations closely follow the policies included within Policy 12 (para. 141, etc.) of the National Planning Policy Framework. In this case an appropriately worded condition on any planning consent would be sufficient to provide for the level of investigation that this proposal warrants.

Historic England's *Historic Environment Good Practice Advice in Planning* suggests the following wording:

No demolition/development shall take place/commence until a written scheme of investigation (WSI) has been [submitted to and] approved by the local planning authority in writing. *For land that is included within the WSI, no* demolition/development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives; and:

- The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. *This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI.*

I understand that this was negotiated and agreed with DCLG. I'm not sure yet how it will work in practice, or whether LPAs will want to still have 2 conditions, the pre-commencement part covering the WSI. If planning consent is granted, I will be able to provide a design brief detailing the requirements for the investigations and provide information on professionally accredited archaeological contractors who may be able to carry out the investigations.

5.3.7 Herts. County Council - Minerals and Waste Planning

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

Most recently, the Department for Communities and Local Government published its *National Planning Policy for Waste (October 2014)* which sets out the following: *'When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:*

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

- the handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities, and minimises off-site disposal.'

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

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

Policy 2: Waste Prevention and Reduction: &

Policy 12: Sustainable Design, Construction and Demolition.

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

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

SWMPs should be passed onto the Waste Planning Authority to collate the data. The county council as Waste Planning Authority would be happy to assess any SWMP that is submitted as part of this development either at this stage or as a requirement by condition, and provide comment to the District Council.

The hybrid application includes detailed and outline elements of development with the detailed aspects totalling 23,170sqm and the outline elements totalling

40,626sqm of development. The need to manage waste effectively is therefore of importance for such a development.

In terms of the accounting for waste management in the proposed development, it is noted that there is a statement of intent to complete a Site Waste Management Plan and a template will be used, with reference to the District Councils waste policies and the need to accord with EU and national legislation, all stated within the Sustainability and Waste Management Strategy which has been submitted as part of the application.

The Waste Planning Authority is keen to see a Site Waste Management Plan for this proposal. Whilst it is acknowledged that a fully completed Site Waste Management Plan cannot be submitted at this stage, there is the need to ensure that waste has been considered in the overall design of the development as early as possible, including the design incorporating building materials made from recycled and secondary sources. The Plan should be written at the construction design stage and should be maintained during the whole project.

The County Council seeks to ensure that waste materials are managed effectively, waste is disposed of legally and material recycling, reused and recovery is maximised through the most appropriate means. The Plan must provide estimated quantities of waste types that may arise during the course of the development and the destination of the waste for management. If a standard template is used, this will require such details and will include a section for comparing the forecasted waste with the actual arisings upon completion of the project.

With regards to hazardous waste, whilst there is not expected to be significant contaminated materials to deal with from this development, section 7 of the Design and Access Statement states that there will be some residual contamination in the soil. In addition, the developer is expecting a certain amount of hazardous waste as the application states that asbestos is relatively commonplace in brownfield development as asbestos detections have been reported. The Sustainability and Waste Management Strategy goes on to state that this will be managed

appropriately as hazardous waste. Such details would be expected to be included within a Site Waste Management Plan.

In terms of the site's location within the sand and gravel belt, there are unlikely to be significant mineral (sand and gravel) deposits within the area in question, however, the relevant Policy 5 within Hertfordshire Minerals Local Plan Review 2002-2016, adopted March 2007 states that mineral extraction will be encouraged prior to other development taking place where the mineral would otherwise be sterilised.

On this basis, development may give rise to 'opportunistic' use of some limited or poorer quality minerals at the site that could be utilised in the development itself. Examination of these opportunities would be consistent with the principles of sustainable development.

5.3.8 Herts Constabulary - Crime Prevention Design Advisor

Detailed elements:

No comments relevant to L Stage Workshop.

Outline elements:

Island Site (Studio Support):

- a) On site car parking is shown around the edge of the site. There should be good natural surveillance from the buildings on site over these parking areas. If there will be large vehicles with expensive equipment on board then these should be protected in a secure service yard area or within the buildings behind roller shutters to a security standard.
- b) Will the site be behind a weldmesh fence helping to secure the site and provide separation from the public space?
- c) Because the buildings will hold valuable equipment or electronic equipment with valuable material thereon, the buildings should be built to a security standard and consideration of fitting monitored alarms (or at least put in the wiring to assist with later fitting of monitored alarms).

5.3.9 Hertfordshire Ecology

Warner Bros. Studios contains two parts of one Local Wildlife Site (LWS), known as Leavesden Aerodrome North and South (our reference: 75/030/01). These grassland areas are designated for their flora interest. There are two adjacent Local Wildlife Sites, which are not affected by these proposals.

An Ecological Appraisal and Management Plan, dated September 2015, by Terrence O'Rourke Ltd has been submitted with this application.

Key points from the report:

- The whole Warner Bros Studios site (not just the application site) was surveyed in 2015 and found to include mixed habitats of little change since previous surveys.
- Some previously suggested management recommendations from 2010 have been revised to ensure maximum biodiversity benefit.
- The LWS within the site will be managed sympathetically to retain its wildlife interest.
- Badgers are using the site and monitoring is required, as will a licence from Natural England to undertake works within 30 meters of sett entrances.
- Biodiversity enhancements are suggested in the form of native tree and shrub planting, wildflower grass sowing in suitable areas, installation of bat and bird boxes and invertebrate log pile.

Hertfordshire Ecology comments and recommendations:

1. A very thorough series of surveys, management recommendations, monitoring, and re-evaluation has been undertaken by the ecological consultants.
2. The Baseline Information in section 2.1 mentions the Herts & Middlesex Wildlife Trust as a data provider and I believe this should say the Hertfordshire Environmental Records Centre.

3. Strictly speaking, only one Local Wildlife Site falls within the site – although I acknowledge that this one site has two parts to it (a northern part and a southern part). Hutton Park Woodland is adjacent to the site, as is The Bothy Chalk Mine Area (although this does have an indefinite boundary as a species LWS - to generally include nearby habitat relevant for that species).
4. The Ecological Management Plan should be followed as a Condition of Approval, or similar.
5. To avoid harm to protected species I advise the following Informatives are added to any permission granted:

Protected Species - It is an offence to take or disturb the breeding or resting location of protected species, and precautionary measures should be taken to avoid harm where appropriate. If protected species, or evidence of them, is discovered during the course of any development, works should stop immediately and advice sought as to how to proceed.

For birds, the removal of trees & shrubs should be avoided during the breeding season (March to September inclusive). If this is not possible then a search of the area should be made by a suitably experienced Ecologist and if active nests are found, then clearance must be delayed until the nesting period has finished.

For reptiles and amphibians, stored materials (that might act as temporary resting places) are raised off the ground e.g. on pallets or batons; and any rubbish is cleared away to minimise the risk of animals using the piles for shelter. Caution should be taken when moving debris piles or building materials as any sheltering animals could be impacted on.

Trenches should have escape ramps to provide an escape opportunity for any animals that may have become trapped.

5.3.10 Herts and Middlesex Wildlife Trust

The submitted ecological information demonstrates that the development will conserve and enhance biodiversity in accordance with NPPF. In order to ensure compliance with the ecological prescription for the site, the following condition is recommended which has been adapted from the British Standard on planning and biodiversity (BS 42020 Biodiversity: Code of practice for planning and development):

Condition: All ecological measures and/or works shall be carried out in accordance with the details contained in; Ecological Appraisal and Management Plan, Terrance O'Rourke Sept 2015, as submitted with the planning application and agreed in principle with the local planning authority prior to determination. Details of ecological monitoring of proposed measures for 2, 5 and 10 years following establishment must be supplied to the LPA. If monitoring reveals that the site is failing to achieve the desired condition, as stated in the management plan, remedial action will be required.

Reason: To ensure biodiversity is conserved and enhanced in accordance with NPPF.

5.3.11 Planning Policy

Development within the Green Belt:

The NPPF is clear that, notwithstanding the specific exemptions listed in para 89, buildings constitute inappropriate development in the Green Belt, and as such are harmful to the Green Belt (para 87). Inappropriate development should only be approved in very special circumstances. In demonstrating very special circumstances, it must also be demonstrated that any potential harm to the Green Belt is outweighed by other considerations. Policy SS1 of the Watford Core Strategy also refers to a general presumption against inappropriate development in the Green Belt. The current applications contain several buildings which fall within the Green Belt. Within Watford's boundary these are part of the Studio Support at

the Island Site (outline application), and the L stage workshop (detailed application). It is therefore important to consider whether very special circumstances have been demonstrated.

The applicant sets out what they consider to be “very special circumstances” in Chapter 6 of the Planning, Design and Access Statement, which can be briefly summarised as:

1. The national significance of the Studios.
2. Economic and social benefits (including the Harry Potter Studios tour bringing visitors to the UK)
3. Operational need for the development to be located at the existing site, - co-location of services and facilities (lack of alternatives).
4. Risk to the UK film industry if investment here does not continue.

For the purposes of considering whether these are sufficient to outweigh any harm to the Green Belt you may also wish to consider how the site currently contributes to the purposes of the Green Belt. Watford’s internal review of sites undertaken in 2014 found that the Island sites did not contribute to any of the 5 purposes of the Green Belt:

Parcel Name	1. Check the unrestricted sprawl of large built-up areas.	2. Prevent neighbouring towns merging into one another.	3. Assist in safeguarding the countryside from encroachment.	4. Preserve the setting and special character of historic towns (heritage assets).	5. Assist in urban regeneration by encouraging recycling of derelict and other urban land (PDL).
Leavesden	<u>No contribution</u> – site	<u>No contribution</u> – site	<u>No contribution</u> – site is not	<u>No contribution</u> to this	<u>No contribution</u> – site

	contains major road junction.	contains major road junction & is surrounded by urban area.	functioning as countryside – major road junction prevents access.	purpose.	contains major road junction.
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The second consultation draft of Watford’s Local Plan Part 2 (Dec 2014-Feb 2015) identified the Island Site as a location for development for Leavesden Studios Operations, and for removal from the Green Belt. Although this policy has not yet reached the formal “publication” stage, it is consistent with a Green Belt boundary change already made by Three Rivers for the adjoining part of the Island Site. No objections have been received to this proposal.

Part of the L stage workshop also falls within the Green Belt – this part of the site has not been proposed for removal and has been assessed as making more of a contribution to the Green Belt.

Parcel Name	1. Check the unrestricted sprawl of large built-up areas.	2. Prevent neighbouring towns merging into one another.	3. Assist in safeguarding the countryside from encroachment.	4. Preserve the setting and special character of historic towns (heritage assets).	5. Assist in urban regeneration by encouraging recycling of derelict and other urban land (PDL).
Leavesden	<u>Significant contribution</u> – major road provides good boundary to	<u>Significant contribution</u> - development of the site would	<u>Contribution</u> – site is not publicly accessible but does contain	<u>No contribution</u> to this purpose.	<u>Contribution</u> – site may be preferable for development

	the built up area.	narrow an important gap between Watford and Abbots Langley.	mature and TPO trees.		but is surrounded by GB in neighbouring Three Rivers DC.
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The “very special circumstances” test is equally applicable to this part of the site. When considering the principle of the proposed uses, it is considered that the national significance of the film industry, the significance in terms of local employment and the lack of alternative locations due to the need for co-location represent very special circumstances which would outweigh the harm to the green belt. However, the harm should still be minimised as far as possible by careful and appropriate design – this is considered separately below.

Employment:

The Core Strategy sets a target of an increase in at least 7,000 jobs over the period 2006-2031. More recent employment forecast suggest a much higher job requirement. The Island Site is identified as an employment location in the emerging Local Plan Part 2, specifically for development linked to the operation of Leavesden Studios.

Chapter 5 of the planning statement (5.8) suggests that the proposed development could create a further 3,500 jobs (direct and indirect) and £120 million per year to the national economy. Of these over 1,000 jobs and £32million are expected to be local (Watford and Three Rivers), plus a further 50 local construction jobs (plus 470 temporary) and £15 million added value. The direct impact is an additional 465 jobs in Watford and Three Rivers. Thus it is expected that the proposed development will contribute towards the job target.

Design Comments:

The two areas which lie within WBC are part of the Island site and the workshop to support L Stage.

L Stage Workshop (detailed):

The design of this workshop building follows the design of other buildings on the main site and has been located and designed to minimise its visibility from the surrounding area – combination of topography and tree screens. It will read as smaller than the L Stage in the landscape. Attention has been paid to the colour of the cladding – changing grey for the sandy colour on the most exposed elevation. This building will replace temporary workshop space currently located elsewhere on the site and will provide much needed workshop space for the users of the stage.

I am satisfied that efforts have been made to minimise the impact of this building on the landscape and the design rationale is the same as that employed elsewhere on the site so that the building is recognised as part of the studio operations. It is important that the tree screens and colour changes proposed are implemented to ensure that the impact is minimised.

Island Site (outline):

This proposals for this site are in outline but do include layout; scale and access. All other matters will be the subject of reserved matters applications. The comments provided here respond to that and do not speculate about the detailed design of the building. The use identified for the buildings is Studio support; this is not really clearly defined anywhere and whilst there is a need for it there is no evidence to show that the amount proposed is needed. The size of the proposed buildings follows the scale of the buildings on the main site which does cause some concern and it would be better to restrict the height to that set by the office buildings on this side of the main road currently occupied by BT. This would ensure that a distinction remains between the two sides of the road and that there is a better relationship to the residential properties in this area.

The site contains a significant amount of car parking and the detailed design of this should include as indicated a serious approach to the landscape structure of the site. The approach of a street will work well internally but care will be needed to ensure that the “back” of the buildings has high quality design as well and some

active uses. As it stands I think that the height and thence the building envelope should be reduced on the Island Site. This is likely to mean a reduction in floorspace for the Studio. Whilst the principle of expansion onto this site in design terms is acceptable, the scale and massing of the buildings should be appropriate for the location and without more detail about the proposed uses and need it is difficult to justify buildings of this height on this site.

6.0 APPRAISAL

6.1 Main issues

The main issues to be considered in the determination of this application are:

- (a) Need for the development
- (b) Economic benefits
- (c) Principle of the development and the Green Belt
- (d) Design and Impact to Neighbouring Amenity
- (e) Highways and Access
- (f) Parking and Servicing
- (g) Trees and Landscaping
- (h) Ecology
- (i) Flood Risk, Drainage and Contamination

6.2 (a) Need for the development

The original vision for the site set out in the 2010 planning application (10/00051/FUL, TRDC 10/0080/FUL) has been realised and demand from the film and TV industries has resulted in a review of the future needs of the Studios. The proposed new developments are intended to reinforce the position of the Studios and Studio Tour in the long term. The aim is to:

- Increase the capacity of the Studios to accommodate more film production, especially the bigger budget blockbuster films. In particular, the demand for larger film stages is consistently high.

- Increase the variety of productions that can be made at WBSL, such as creation of high-end TV productions.
- Enable WBSL to offer a broader set of supporting services including post-production facilities that can see a production through from development to release. The existing workshops and production support spaces are oversubscribed on a regular basis.
- Rationalise the amount of temporary buildings that are currently used for studio support facilities by providing purpose built, fully serviced buildings.
- Enhance the Studio Tour, showcasing sets and artefacts from other film productions.

The new vision is set out in an overall masterplan that forms this hybrid application. The detailed elements of the application comprise those where the design can be fixed to meet the immediate needs of the productions wishing to come to WBSL. Outline elements have also been identified to give a comprehensive view of the future vision of the site. These are required to meet the long term needs of the Studios in a flexible manner. Permission is sought for scale, layout and access to be approved for these outline elements, with all other matters (appearance and landscaping) reserved for later approval.

6.3 (b) Economic benefits

The submitted Planning, Design and Access Statement and Economic and Social Assessment outline the success of Warner Bros. Studios Leavesden (WBSL). Over £150 million has been invested since 2010 to create ‘*world-class*’ film making facilities alongside the Warner Bros. Studio Tour London – The Making of Harry Potter, which ‘*showcases the craftsmanship, skill and artistry of the people behind the film franchise and promotes UK film-making talent*’.

These two facilities have generated numerous jobs and significant economic value. It is stated that nationally the net direct and indirect impacts currently support approximately 7,500 jobs whilst the current direct and indirect contribution of WBSL’s activities to the economy is over £240 million per year. Of this, 1,300 jobs

are stated to fall within Three Rivers and Watford areas and it is estimated that £43 million of value is added to the local economy.

The success of WBSL has had wider positive effects for local firms such as printers, transport companies and hotels. WBSL also carries out outreach work with local schools and colleges, runs an active training and apprenticeship programme and provides ongoing support for local charities such as Watford Mencap and Peace Hospice Care.

It is estimated that the development now proposed could create a further 3,500 jobs and contribute £120 million per year to the national economy when completed. In addition there would be a temporary boost through construction activity of around 470 jobs and £146 million in gross value added (GVA) nationally. The local share of this is thought to be 1,000 jobs and £32 million of GVA for the Three Rivers and Watford areas supported through WBSL, with another 50 jobs and £15 million of GVA being generated by the construction activity.

The proposal would be consistent with the aims of Hertfordshire LEP's Strategic Economic Plan to promote and develop film/TV in south west Hertfordshire as part of a wider cluster with a footprint that includes London and Buckinghamshire. Overall it is considered that the proposed development would bring significant benefits to the local, regional and national economy.

6.4 (c) Principle of the development and Green Belt

Paragraph 79 of the NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and notes that the essential characteristics of Green Belt land is its openness and its permanence. The purpose of Green Belts is:

- To check the unrestricted sprawl of large built up areas.
- To prevent neighbouring towns from merging into one another.
- To assist in safeguarding the countryside from encroachment.
- To preserve the setting and special character of historic towns.

- To assist in urban regeneration by encouraging the recycling of derelict land and other urban land.

Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The NPPF goes on to note that *'very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations'* (para. 88).

The Site Allocations Local Development Document (LDD) of Three Rivers District Local Plan has removed the built areas of WBSL from the Green Belt together with the northern part of the Island Site that falls within Three Rivers District. This document states:

'In order not to compromise the ability of the Leavesden Studios to contribute to the economic growth of the District over the Plan period, the site is to be allocated specifically for Leavesden Studios Operations with the Backlot being retained in the Green Belt (Site GB2).'

Policy SA8 of this document goes on to state that *'development on this site must be in relation to the Leavesden Studios operations and associated uses'*.

However, the southern part of the Island Site within Watford Borough remains in the Green Belt. The Council's Local Plan part 2 – Second Consultation has proposed the removal of the southern part of the Island Site from the Green Belt, in the same way that the northern part has been removed by Three Rivers. The justification for this is that it will provide for the future expansion of Leavesden Studios, which is acknowledged to be of national economic significance, and to ensure a consistent approach with Three Rivers. Nevertheless, at the present time, it remains in the Green Belt and the proposed development of the site constitutes inappropriate development in the Green Belt and must be assessed accordingly.

Furthermore, the L Stage Workshop is also located within the Green Belt (both within Watford and Three Rivers) and also, therefore, constitutes inappropriate development in the Green Belt.

It is therefore incumbent upon the applicant to demonstrate that 'very special circumstances' exist for these elements of the application.

The Planning, Design and Access Statement submitted with the application sets out the following factors as constituting, individually and cumulatively, 'very special circumstances' in respect of these elements of the development proposals:

- WBSL is already of national significance and brings economic and social benefits. The site makes a substantial positive direct and indirect contribution to the economy each year (see above) and there is significant risk to the UK film industry if the investment is not encouraged. The risk to WBSL should the development not go ahead would result in a loss of talent and job opportunities.
- There are no viable alternative sites that could be developed that would meet the additional requirements of the Studios. Key to the success of the Studios is the comprehensive range of film making activities that can be undertaken on a single site. This is important due to the reactive nature of film production. Locating facilities and services off site would be unattractive and unsustainable, requiring significant additional staff trips and services duplicating those at WBSL (e.g. security, catering, IT/data, etc).
- WBSL's backlot is a major attraction to both British and overseas filmmakers as it affords an expansive on-site outdoor area for large set-building with a 180 degree clear horizon for shooting.
- There would be no significant adverse effect on the openness or visual amenities of the Green Belt. The buildings have been designed to reflect the character of the wider site in terms of building height, scale and massing. Furthermore, landscaping will work to soften the visual appearance of each element.

- The development will not significantly affect the amenity of neighbouring properties, or otherwise result in demonstrable harm.

In assessing the role each of the two parcels of land within Watford play in the purposes for including land within the Green Belt, and therefore the level of harm to the Green Belt that would result from their development, the Planning Policy team have undertaken an initial assessment of each site. This assessment is detailed in Section 5.3.11 above.

The Island Site is isolated from other land within the Green Belt by Gadeside and is entirely surrounded by Gadeside and Aerodrome Way. It is considered that this site makes no contribution to the purposes of including land in the Green Belt. It is for this reason, that in the emerging Local Plan Part 2 it is proposed to remove this land from the Green Belt.

The site of the L Stage Workshop is considered to make some contribution to the Green Belt and the purposes of including land within it. The site is located to the north of North Western Avenue which forms a strong boundary between the Green Belt to the north and the urban area of Watford to the south. The site is also isolated from the main complex of studio buildings some 750m to the north-east. It is, however, adjacent to the existing L Stage building and will be visible from only limited viewpoints to the west along the M25 corridor. The southern boundary to North Western Avenue is marked by a significant embankment. The western elevation of the building, which is the only elevation that is visible from outside the site, will be seen in the context of the existing L Stage building and is to be coloured grey (the same colour as the roof) to further reduce its visual impact. Existing tree planting along the western boundary will be retained and additional tree planting will be undertaken as part of the strategic landscape plan for the overall site.

To help in the assessment of the impact of the proposed development on the openness of the Green Belt, the Landscape and Visual Appraisal provides a useful assessment of predicted views, both locally and from further afield. It identifies a 2.5km zone of visual influence (ZVI) where the development may have an effect on

visual amenity. However, the visual envelope is relatively small largely due to the dense urban development of Watford and Abbots Langley. The main long distance views are from the west but a combination of topography and vegetation reduces the extent of this area of visibility and it does not extend beyond the M25 transport corridor.

Effects on views are predicted at 8 local viewpoints. Of these the magnitude of change is expected to be greatest at the following points relevant to the development in Watford:

- Open space area opposite Studio Tour entrance on Aerodrome Way. The Studio Tour extension and associated car park, post production facility, offices, production support building and Q & R Stages would result in expansion of the immediate built form. It would '*change the overall balance and composition of the view*'. The development would, however, be viewed in the context of existing built development and would be no higher than the existing buildings. New bunding and landscaping is proposed to soften the view and partially screen some of the development, particularly the surface level car park. The Island Site development would also be very apparent, although this is allocated for Studio related development and no longer lies within the Green Belt. (*Note: these comments are correct only for the northern part of the site within Three Rivers*).
- Ashfields bridge over the A41. Largely due to development of the Island Site, the new development would result in a substantial change to the view but would be visible in the immediate context of large-scale infrastructure and existing built development. It is not considered to be a location of high sensitivity in terms of views.

The proposal development of the L Stage Workshop and the Island Site would not, therefore, result in any significant harm to the openness of the Green Belt and visual amenities of the area. The main areas of visual change would be from

viewpoints that are generally already affected by built development, with the new buildings read in conjunction with the existing Studio buildings.

With regard to the purposes of including land within the Green Belt, given the location of the Studios between settlements, and that the development in the Green Belt would still retain a large backlot area which by its nature is to remain undeveloped, with open fields beyond, it is not considered that the proposal would constitute unrestricted sprawl of large built up areas, would not merge into neighbouring towns and would not encroach into the countryside.

Overall, whilst the proposal would amount to inappropriate development in the Green Belt the 'very special circumstances' demonstrated, on balance, are considered to outweigh the harm of the proposal on the Green Belt, by virtue of its inappropriateness and any other harm. However, under the Town and Country Planning (Consultation) (England) Direction 2009, where a Local Planning Authority proposes to approve inappropriate development within the Green Belt of 1000m² or more, the application must be referred to the Secretary of State for Communities and Local Government before any planning permission can be issued. The Secretary of State has the power to call-in the application for his own determination. As the proposed development falls within this criteria, the application will need to be referred to the Secretary of State under this Direction.

6.5 (d) Design and Impact to Neighbouring Amenity

The L Stage workshop would be lower in height than L Stage itself (11m compared to 14m) and would follow the design and materials of existing workshop buildings on the main studio site. It will also complement the design of L Stage. The main external material will be profiled metal cladding in Straw colour for the north, east and south elevations. The west elevation is to be in Pure Grey colour, to match the roof, in order to minimise its visual impact on more distant views from the west. Additional tree planting along the western boundary of the site will also help to minimise the impact of this building on the landscape. There are no residential properties in close proximity to this proposed building and it will have no adverse impacts on residential amenity.

With regard to the Studio Support facilities on the Island Site the Urban Design and Conservation Officer commented that:

'The size of the proposed buildings follows the scale of the buildings on the main site which does cause some concern and it would be better to restrict the height to that set by the office buildings on this side of the main road currently occupied by BT. This would ensure that a distinction remains between the two sides of the road and that there is a better relationship to the residential properties in this area. The site contains a significant amount of car parking and the detailed design of this should include as indicated a serious approach to the landscape structure of the site. The approach of a street will work well internally but care will be needed to ensure that the "back" of the buildings has high quality design as well and some active uses. As it stands I think that the height and thence the building envelope should be reduced on the Island Site. This is likely to mean a reduction in floorspace for the Studio. Whilst the principle of expansion onto this site in design terms is acceptable, the scale and massing of the buildings should be appropriate for the location and without more detail about the proposed uses and need it is difficult to justify buildings of this height on this site.'

Consequently, as a result of these comments, amended plans were received that show a reduction in maximum building heights on the Island Site from 18m and 16m (as originally proposed) to 15m. The overall floorspace remains at 18,580 sqm.

Although the development of the Island Site will constitute a significant change in the immediate locality, as the current site comprises grass and scattered small trees, this scale of commercial development is seen on the southern side of Aerodrome Way to the north-east. The Leavesden Park office development sited 500m to the north-east comprises four 4 storey office buildings at approximately 15m height. These buildings are sited adjacent to the main Studio entrance and in relatively close proximity to existing residential development at Huntonbury (to the

south) and the recently completed development to the north.

The development of the Island Site, adjacent to the Studio Tour entrance, will be opposite existing residential development at Jordan Close, Ashfields and Poundfield. The proposed siting of the buildings will be 120m from the nearest property in Jordan Close, 90m from the nearest property in Ashfields and 90m from the nearest property in Poundfield. These distances are more than sufficient to ensure the proposal will have no adverse impacts on the amenity of these properties. Furthermore, the eastern side of Aerodrome Way at this point contains a belt of mature trees that provides effective screening to Poundfield and a landscaped area of land adjacent to Jordan Close, planted as part of the construction of Aerodrome Way. These areas of existing landscaping will help to effectively mitigate views of the proposed development.

6.6 (e) Highways and Access

The application was supported by a detailed Transport Assessment. This considered the existing situation on the surrounding highways arising from the current use of the main Studio site and the Studio Tour. The additional traffic generation from the proposed expansion of the Studio use and the Studio Tour was then predicted and the impact of this additional traffic modelled on a number of junctions on the surrounding road network. The key factor in traffic generation was considered to be the increase in the capacity of the Studio Tour, proposed to have a maximum number of 9,000 visitors a day, an increase of 2,617 during peak periods (i.e. weekends) and 3,272 on a normal weekday.

Both Highways England and Herts. County Council as the Highway Authority raised a number of issues and concerns in their review of the Transport Assessment. As a result, the applicant's transport consultant submitted additional data and assessments for consideration, including traffic impact assessments on Junction 6 of the M1 and Junction 21a of the M25, the key strategic junctions giving access to the site. As a result of this additional information, both Highways England and the Highway Authority are generally satisfied that the impacts on the highway network and on the strategic junctions are acceptable, with the only exceptions being

Junction 21a of the M25 and the Ashfields/Courtlands Drive/ North Western Avenue roundabout.

Highways England have identified that some mitigation of Junction 21a may be required, subject to further assessment being undertaken. However, they are satisfied that appropriate mitigation is possible (as a result of work undertaken in relation to a previous planning application in St Albans District) and have requested a financial contribution in the event that this is found to be required. Three Rivers District Council will secure any necessary financial contribution through the Section 106 Agreement that will form part of their grant of planning permission. The other issue of concern requiring some further mitigation is the increased traffic flows at the Ashfields/Courtlands Drive/ North Western Avenue roundabout, to ensure that queues do not exceed the baseline queue lengths and the degree of saturation is taken to the baseline. The proposed mitigation is in the form of an updated Travel Plan, to be developed in accordance with HCC Guidance. This can be secured by condition but will need to be included in the planning permission granted by Three Rivers District Council as the existing Travel Plan relates to the main Studio site and the Studio Tour. There is no justification to include this in relation to the development within Watford Borough.

The proposals include a new access junction to the Island Site from Aerodrome Way. This is proposed to be taken as a new arm from the existing signal controlled junction with Ashfields. The Highway Authority requested a Stage 1 Safety Audit for the proposed junction improvement in order to ensure problems are resolved at an early stage in the design process. A Stage 1 Road Safety Audit has been submitted which raises potential issues such as the site access route being short, which could result in queuing; the absence of a pedestrian phase on exit from the junction into Ashfields (east); and approaches resulting in late lane changes. A designer's response has been provided to address these issues. The Highway Authority have stated that the responses are considered acceptable and that any outstanding matters can be dealt with at the detailed design stage. The principle of this new junction is therefore acceptable.

6.7 (f) Parking and Servicing

Parking for the L Stage Workshop will be accommodated within the general provisions, as proposed, of the main Studio site. One of the outline elements within Three Rivers is for a multi-storey decked car park (2,250 spaces) at the entrance of the Studio site, together with other surface level spaces within the site (28 of these spaces are provided at L Stage Workshop), to provide a total of 2,318 spaces. This will comprise 1610 spaces to replace existing spaces on the site and 708 additional spaces to accommodate the parking requirements of the expanded Studios.

The proposed new floorspace within the Studio site (excluding the Studio Tour and Island Site) is 31,281 sqm (23,170 sqm detailed and 8,111 sqm outline). The Council's maximum standard for mixed B class uses (B1/B2/B8), which is considered the most appropriate standard for the Studio use, is 1 space per 40 sqm. The site lies within Car Parking Zone 4 where the acceptable level of provision is 75-100% of the maximum standard. On this basis, the level of provision for the proposed new floorspace should be 586-782 spaces. The actual provision of 708 spaces is therefore acceptable.

For the Island Site, the proposed floorspace is 18,580 sqm. The exact nature of the uses proposed is unclear but if they are to be operational support uses to the main Studio, the uses are likely to be Class B1 (office/research/light industry). Applying a maximum standard of 1 space per 30 sqm (office use) to this floorspace would give a maximum of 619 spaces. A mixed B1 use at 1 space per 35 sqm would give a maximum of 530 spaces. Applying a reduction of 25% in each case to provide an operational minimum level of provision in accordance with the parking standards (the site falls within Parking Restraint Zone 4), would give figures of 464 and 397 spaces respectively. As submitted, 480 spaces are to be provided. This level of provision is within the operational minimum and maximum levels allowed by the Council's parking standards and is acceptable.

Servicing of L Stage Workshop will take place via the main Studio entrance with a large servicing apron in front of the building (57.6m deep) and a large rear servicing yard (34m deep) to the rear. Servicing of the Island Site will take place via the new

access junction on Aerodrome Way. Details of the actual servicing arrangements within the site will need to be submitted at detailed reserved matters stage.

6.8 (g) Trees and Landscaping

The application is accompanied by an Arboricultural Appraisal, which includes a Tree Protection Plan, as well as a Landscape Planting Strategy. No existing trees around the L Stage Workshop will be removed but additional native woodland planting is proposed to the west of the service yard and along the western boundary of the site to enhance the existing boundary trees.

Within the Island Site, there are only 2 trees of any significance, an oak and a field maple, neither of which are protected. The site otherwise comprises open grassland with scattered, small trees and bushes. Both the oak and field maple are shown to be retained although one is sited within the proposed car park circulation area and it may not be practicable to retain this tree at detailed stage.

Nevertheless, significant new boundary tree planting is proposed which would more than off-set the loss of this tree.

6.9 (h) Ecology

The site is not covered by any international or national ecological designations. The Leavesden Aerodrome Studios County Wildlife Site (75/030) comprises two areas, one to the north in Three Rivers and one to the south which straddles the boundary with Watford. The southern area is sited to the east of L Stage. This is an area of neutral grassland.

The application is accompanied by a Biodiversity Checklist and a report comprising an Ecological Appraisal, Phase 2 Surveys and an Ecological Management Plan.

Herts Ecology has commented that the surveys, management recommendations, monitoring and re-evaluation undertaken by the ecological consultants is very thorough. Herts and Middlesex Wildlife Trust has confirmed that the submitted ecological information demonstrates that the development will conserve and enhance biodiversity in accordance with NPPF. It is recommended that the

Ecological Management Plan be followed; this would be controlled by condition. Informatives relating to protected species are also suggested.

With regard to the County Wildlife Site, the management recommendations include the selective removal of encroaching scrub to maintain the condition of the grassland.

As part of the new Studio Tour car park, the existing earth bund along the southern boundary of the site with Gadeside is to be reformed and reprofiled. On the submitted drawings, the western end of the proposed bund is shown to encroach into the County Wildlife Site. This is not considered acceptable and there would appear to be no particular reason for this to occur. Notwithstanding what is shown on the submitted drawings, a condition can be imposed to require further details of the siting, height and profile of the bund to ensure that it has no adverse impact on the County Wildlife Site.

With regard to the Island Site, the main ecological interest is the presence of 3 badger setts on the site, two on the western boundary with Gadeside and one on the northern corner close to the roundabout on Aerodrome Way. These appear to be small setts comprising only a single hole or two holes. It is unlikely these 3 setts will be able to be retained with the proposed development of the Island Site, however, as the development of this site is not planned for the short term there is ample time for a mitigation strategy to be agreed with Natural England and appropriate licences obtained. This could include the temporary or permanent closure of the setts and, if appropriate the creation of an artificial sett.

6.10 (i) Flood Risk, Drainage and Contamination

The site lies within Flood Risk Zone 1 which has the lowest probability of flooding but, due to the size of the site, the application is accompanied by a Flood Risk Assessment (FRA) and Surface Water Drainage Strategy. A Contamination Assessment has also been provided. These documents conclude that there is a low risk of flooding; that the proposed drainage system (to consist of attenuation tanks or stone aggregate course under porous paving with infiltration voids) would

manage and treat surface water runoff appropriately; and that groundwater is at considerable depth below the site and previous remediation measures have minimised risks of contamination to groundwater.

Section 5.3.3 sets out in detail the consultations with Herts County Council as the Local Lead Flood Authority (LLFA) regarding the proposed surface water drainage scheme. The LLFA are a statutory consultee for all major applications. Following the submission of the requested additional information, the proposed surface water drainage scheme is considered to be acceptable and will reduce the risk of flooding downstream. Conditions are suggested to ensure that the detailed elements of the scheme are implemented in accordance with the submitted information, and that a drainage strategy for the outline elements is submitted at reserved matters stage.

With regard to foul water drainage, Thames Water has requested detailed foul and surface water drainage plans to ensure that the sewerage system has sufficient capacity to accommodate the new development. Whilst the submitted drainage plans do show some information with regard to foul water drainage, a condition is suggested requiring a full drainage strategy to be submitted for approval.

The submitted Contamination Assessment recognises that there will be a requirement for groundworks to be carried out in areas where stockpiled fill materials are located, which includes the new L Stage Workshop area to the south west corner of the main site. However, detailed contaminated land assessments have been carried out in the past and based on a review of the available historic data and current supplementary soil analysis results, it is not considered that specific remediation is necessary. This has been confirmed by the Environmental Health Officer at Three Rivers who has reviewed the Contamination Assessment for the whole site.

The Environment Agency has commented that the site is located in Source Protection Zone 2, therefore the proposal needs to be dealt with in a way which protects the underlying groundwater. In particular no infiltration based SuDS should be constructed on land affected by contamination and piling or any other foundation

designs using penetrative methods should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution. The recommendations in the submitted Contamination Assessment should be followed.

7.0 COMMUNITY INFRASTRUCTURE LEVY AND PLANNING OBLIGATIONS

7.1 Community Infrastructure Levy (CIL)

The Council introduced the Community Infrastructure Levy (CIL) with effect from 1 April 2015. The CIL charge covers a wide range of infrastructure as set out in the Council's Regulation 123 list, including highways and transport improvements, education provision, youth facilities, childcare facilities, children's play space, adult care services, open space and sports facilities. CIL is chargeable on the relevant net additional floorspace created by the development. The charge is non-negotiable and is calculated at the time that planning permission is granted.

Liability to CIL only arises for certain uses, specifically residential (general market and specialist), hotel and retail uses (Classes A1-A5). In this case, the proposed uses are either ancillary to the main studio use (L Stage Workshop) or will constitute office or other uses (Island Site). As such, the proposal will not be liable for CIL in this case.

7.2 Planning Obligations

The main studio use and Studio Tour is the subject of a number of planning obligations with Three Rivers District Council relating to the operation of the Studio Tour and the use of the site for hospitality events. A new s.106 agreement is to be completed between the applicant and Three Rivers District Council as part of application ref. 15/01300/OUTM. None of the existing planning obligations to be included in this agreement will relate to the use of the L Stage Workshop or the Island Site. The only requirement arising from the current application is for the payment of a financial contribution to Highways England in the event that mitigation works are required to Junction 21a of the M25. This requirement will be included within the s.106 agreement by Three Rivers District Council. As such, no planning obligations are required in respect of the application being considered by Watford

Council.

8.0 CONCLUSION

- 8.1 Those parts of the site within Watford Borough are located within the Green Belt where film studio use constitutes inappropriate development. The proposed development for film production and associated activities is therefore contrary to policy and, by definition, harmful to the Green Belt. However, the proposed development constitutes an expansion of the existing and established use of the site as film studios and it is considered that the local, regional and national importance of the film studios constitutes 'very special circumstances' that outweigh the harm to the Green Belt. The proposed development will enable the applicants to maintain and improve their very significant economic and social role in the local, regional and national economy and within the UK film industry.

Furthermore, the southern part of the Island Site is considered to make no contribution to the purposes of including land in the Green Belt and is proposed to be removed from the Green Belt under the Council's emerging Local Plan Part 2 Site Allocations document. The northern part of the Island Site has already been removed from the Green Belt by Three Rivers Council. The impact of the proposed L Stage Workshop building on the openness of the Green Belt is considered to be limited in this case.

The application is supported by a range of technical documents that have been reviewed by statutory and non-statutory consultees. With the submission of additional information, no consultees are objecting to the proposals. The Island Site will be served by a new access junction on Aerodrome Way which has been the subject of a Stage 1 Safety Audit and is considered acceptable in principle.

Although the development of the Island Site with buildings up to 15m high will be a significant change to the locality, the scale of buildings will be similar to those to the north at Leavesden Park and lower in height than those at the Studio Tour on the opposite side of Aerodrome Way. In this context, it is not considered that the

proposed buildings will have a harmful effect on the character and appearance of the area. Due to the distance to the nearest residential properties and the presence of existing tree screening, the proposed buildings will have no adverse impacts on the amenities of existing residential occupiers.

9.0 HUMAN RIGHTS IMPLICATIONS

9.1 The Local Planning Authority is justified in interfering with the applicant's human rights in order to alleviate any adverse effect on adjoining properties and their occupiers and on general public amenity. With regard to any infringement of third party human rights, these are not considered to be of such a nature and degree as to override the human rights of the applicant and therefore warrant refusal of planning permission.

10.0 RECOMMENDATION

That the Secretary of State for Communities and Local Government be consulted in accordance with the Town and Country Planning (Consultation) (England) Direction 2009 and, provided the Secretary of State does not call in the application for his own determination, planning permission be granted subject to the following conditions:

Detailed element

L Stage Workshop (Development Area 1 on drawing number 1184/PL/1011 A) and adjoining land

1. The development to which this permission relates shall be begun within a period of three years commencing on the date of this permission.

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

2. The development hereby permitted shall be carried out in accordance with the following approved drawings:-

PL/224401/TOR1

1184/PL/1009, 1184/PL/1010A, 1184/PL/1011A, 1184/PL/1012A
1218/PL/1001, 1218/PL/1002, 1218/PL/1003, 1218/PL/1004, 1218/PL/1005,
1218/PL/1006, 1218/PL/1007

Reason: For the avoidance of doubt and in the interests of proper planning.

3. The building hereby approved shall not be constructed at a ground level that exceeds the ground level of 95.00 FFL shown on the approved drawings and shall not exceed a height of 11m above the approved ground level.

Reason: In the interests of the openness of the Green Belt and the visual amenity of the site, in accordance with policies GI2 and UD1 of the Watford Local Plan Core Strategy 2006-31.

4. The building hereby approved shall be constructed in the materials shown on the approved drawings, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of the visual amenity of the site, in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

5. The building hereby approved shall be carried out in accordance with the approved Flood Risk Assessment (FRA) carried out by Quattro Consult reference 4302 dated September 2015, Quattro Consult letters dated 16 October 2015 and 12 November

2015, drawing no. 4315-005-RevA and the following mitigation measures detailed within the FRA:

1. Limiting the surface water run-off generated by the 1 in 100 year + climate change critical storm so that it will not exceed the run-off from the undeveloped site and not increase the risk of flooding off-site.
2. Providing infiltration where possible through the use of infiltration trenches.
3. Limiting any surface water overflow into the existing piped drainage system above the 1 in 100 year + climate change event to pre-development greenfield run-off rate of 5l/s.

The mitigation measures shall be fully implemented prior to occupation / use of the development and subsequently in accordance with the timing / phasing arrangements embodied within the drainage scheme, or within any other period as may subsequently be agreed, in writing, by the Local Planning Authority.

Details of how the surface water drainage scheme shall be managed and maintained after completion for the lifetime of the development, which shall include the arrangements for adoption by any public authority or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime, shall be submitted to and approved in writing by the Local Planning Authority prior to occupation / use of the development. The sustainable drainage scheme shall be managed and maintained in accordance with the approved details thereafter.

Reason: To prevent flooding by ensuring the satisfactory storage of and disposal of surface water from the site in accordance with Policy SD2 of the Watford Local Plan Core Strategy 2006-31.

6. No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence until a Construction

Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority. This Plan shall include (but not exclusively) details of:

- a development schedule including timetable of works
- parking of vehicles of site operatives and visitors
- access arrangements including the routing of vehicles away from residential roads
- management of deliveries to avoid peak times
- loading and unloading of plant and materials
- storage of plant and materials
- the erection and maintenance of security hoarding, where appropriate
- wheel washing facilities
- measures to control the emission of dust and dirt during demolition and construction
- measures to minimise noise emissions during demolition and construction
- hours of working
- the siting and type of fencing to protect all trees, hedges and habitats to be retained and all watercourses
- measures to manage ecological habitats during demolition and construction
- safe access to site offices

The Construction Environmental Management Plan shall be implemented as approved and adhered to throughout the period of construction works.

Reason: This condition is a pre-commencement condition in the interests of the local environment and highway safety in accordance with saved Policy T21 of the Watford District Plan 2000.

7. No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence until a Site Waste Management Plan (SWMP) for all aspects of waste management during site preparation and

construction has been submitted to and approved in writing by the Local Planning Authority. This shall include measures for recycling/disposing of waste resulting from demolition and construction works. The development shall be carried out in accordance with the approved SWMP throughout the period of construction works.

Reason: This condition is a pre-commencement condition in the interests of the local environment and sustainability in accordance with Policies SD1 and SD4 of the Watford Local Plan Core Strategy 2006-31.

8. No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence until an archaeological written scheme of investigation (WSI) for the development site has been submitted to and approved in writing by the Local Planning Authority. This shall include the following:
 - i) The statement of significance and research objectives;
 - ii) The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works;
 - iii) Such appropriate mitigation measures indicated as necessary by the evaluation. This may include:
 - a) the preservation of any remains *in situ*, if warranted,
 - b) appropriate archaeological excavation of any remains before any development commences on the site, with provisions for subsequent analysis and publication of results,
 - c) archaeological monitoring of the groundworks of the development (also including a contingency for the preservation or further investigation of any remains then encountered),
 - d) and such other provisions as may be necessary to protect the archaeological interests of the site.
 - iv) The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material.

No development works shall take place other than in accordance with the approved WSI.

Reason: This condition is a pre-commencement condition to ensure a record is made of any archaeological remains present, in accordance with Policy UD2 of the Watford Local Plan Core Strategy 2006-31.

9. No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence until a foul water drainage strategy, detailing all associated on and off site drainage works, has been submitted to and approved by the Local Planning Authority. The development shall proceed in strict accordance with the approved drainage plans and shall not be occupied / used until the drainage works are complete.

Reason: This condition is a pre-commencement condition to ensure that the sewerage system has capacity to cope with the new development and to avoid adverse environmental impacts.

10. No piling or any other foundation designs using penetrative methods shall be undertaken other than with the written consent of the Local Planning Authority, which may be given where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: To protect the water environment, including groundwater, in accordance with saved Policy SE24 of the Watford District Plan 2000. The site is located on a Principal Aquifer and within a Source Protection Zone 2.

11. No occupation or use of the building hereby approved shall commence until a waste management scheme, detailing the siting, capacity and design of storage areas for waste and recycled materials, and a management plan for collection, has been submitted to and approved in writing by the Local Planning Authority and this

scheme has been implemented in full. These facilities shall be retained as approved at all times.

Reason: To ensure adequate facilities are provided in the interests of the visual amenity of the Green Belt and the site, in accordance with Policies GI2 and UD1 of the Watford Local Plan Core Strategy 2006-31.

12. No occupation or use of the building hereby approved shall commence until details of secure and weatherproof cycle storage facilities, based upon the Council's cycle parking standards within the Watford District Plan 2000, have been submitted to and approved in writing by the Local Planning Authority and these facilities have been provided in accordance with the approved details. These facilities shall be retained as approved at all times.

Reason: To ensure adequate facilities are provided in the interests of the visual amenity of the Green Belt and the site, in accordance with Policies GI2 and UD1 of the Watford Local Plan Core Strategy 2006-31.

13. No external lighting shall be installed on the site or affixed to the building hereby approved unless the Local Planning Authority has first approved in writing details of the position, height, design, intensity and time restrictions of the lighting. The lighting shall be installed and operated thereafter in accordance with the approved details.

Reason: In the interests of the visual amenity of the Green Belt and the site, in accordance with Policies GI2 and UD1 of the Watford Local Plan Core Strategy 2006-31.

14. No occupation or use of the building hereby approved shall commence until there has been submitted to and approved in writing by the Local Planning Authority a scheme of soft landscaping for the site, which shall include the location of all existing trees and hedgerows affected by the proposed development, details of those to be retained together with a scheme detailing measures for their protection

in the course of development, and cut and fill sections where applicable. This shall include details for the protection of the County Wildlife Site sited to the east of L Stage.

All soft landscaping works required by the approved scheme shall be carried out in accordance with a programme to be agreed in writing by the Local Planning Authority before development commences and shall be maintained (including the replacement of any trees or plants which die, are removed or become seriously damaged or diseased in the next planting season with others of a similar size or species, unless the Local Planning Authority gives written consent to any variation) for a period for five years from the date of the approved scheme was completed.

Reason: In the interests of visual amenity in accordance with saved Policies SE36, SE37 and SE39 of the Watford District Plan 2000.

15. No occupation or use of the building hereby approved shall commence until there has been submitted to and approved in writing by the Local Planning Authority a scheme of hard landscaping for the site, which shall include details of all boundary treatments and the enclosure of the rear service yard to the L Stage Workshop.

All hard landscaping works required by the approved scheme shall be carried out and completed prior to the first occupation of the L Stage Workshop and shall be retained as approved at all times.

Reason: In the interests of visual amenity in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31..

16. Notwithstanding the details shown on the approved drawings regarding the remodelled earth bund along the southern boundary of the site adjacent to Gadeside, no part of the bund shall encroach into the County Wildlife Site or within the root protection zones of any trees within this site.

Reason: To prevent damage to the wildlife site and maintain its ecological integrity, in accordance with Policy GI3 of the Watford Local Plan Core Strategy 2006-31.

17. No remodelling works to the earth bund along the southern boundary of the site adjacent to Gadeside shall commence until full details of the siting, height and profile of the bund have been submitted to and approved in writing by the Local Planning Authority. The earth bund shall only be constructed in accordance with the approved details and shall be retained as approved at all times.

Reason: In the interests of the visual amenity of the Green Belt and the site, in accordance with Policies GI2 and UD1 of the Watford Local Plan Core Strategy 2006-31.

18. Immediately following implementation of this permission all ecological measures and/or works shall be carried out in accordance with the details contained in the Ecological Appraisal and Management Plan (Terence O'Rourke, September 2015) as submitted with the planning application. Details of ecological monitoring of the ecological management measures at 2, 5 and 10 years from the date of this planning permission shall be submitted to the Local Planning Authority for written approval. If monitoring reveals that the site is failing to achieve the desired condition, as stated in the Ecological Management Plan, appropriate remedial action shall take place, details of which (including a timetable for implementation) shall be submitted to and approved in writing by the Local Planning Authority. The remedial action shall be implemented as approved.

Reason: To protect, mitigate and enhance opportunities for wildlife in accordance with Policy GI3 of the Watford Local Plan Core Strategy 2006-31.

19. All plant, machinery and equipment installed or operated in connection with the development shall be so enclosed and/or attenuated so that noise there from does not exceed a level of 45 dB(A) during the day and 30 dB(A) during the night when measured at a distance of 1 metre away.

Reason: To ensure that the nearby residential properties are not subjected to excessive noise and disturbance having regard to saved Policy SE22 of the Watford District Plan 2000.

20. The building hereby approved shall only be used for purposes associated with film making and not for public exhibition purposes at any time.

Reason: To ensure future control of the site and having regard to potential additional impacts on the highway network that have not been assessed.

21. Notwithstanding the provisions of Schedule 2, Part 4 of the Town and Country Planning (General Permitted Development) Order 2015 (or any other order revoking and re-enacting that order with or without modification), no temporary uses of land and associated structures, other than temporary facilities and/or structures required for the purposes of filming, shall take place unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of the visual amenity of the site in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

Outline element

Island Site (Development Area 11 on approved plan number 1184/PL/1011 A)

22. No development shall commence within the Island Site until details of the reserved matters of appearance and landscaping have been submitted to and approved in writing by the Local Planning Authority. The development shall only be implemented in accordance with the approved details.

Reason: To comply with the provisions of Section 92(2) of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

23. Applications for approval of the reserved matters for the Island Site shall be made to the Local Planning Authority before the expiration of ten years from the date of this permission. Development shall commence before the expiration of two years from the date of approval of the final reserved matters application.

Reason: In pursuance of Section 92(2) of the Town and Country Planning Act 1990 and as amended by the Planning and Compulsory Purchase Act 2004.

24. The reserved matters applications pursuant to this permission shall be made in accordance with the following approved drawings:

PL/224401/TOR1

1184/PL/1009, 1184/PL/1010A, 1184/PL/1011A, 1184/PL/1012A

Reason: In the interests of the visual amenities of the locality and residential amenity in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

25. The development hereby permitted in outline shall not exceed the maximum height of 15m above existing ground level, as shown on approved plan number 1184/PL/1012 A.

Reason: In the interests of the visual amenities of the locality and residential amenity in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

26. The buildings shown in outline on the whole of the Island Site (within Watford Borough and Three Rivers District) shall not exceed a combined total of 13,200 sqm gross external footprint and 18,580 sqm gross internal floorspace, as shown on approved plan number 1184/PL/1012 A.

Reason: In the interests of the visual amenities of the locality and residential amenity in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

27. The buildings hereby permitted shall only be used for purposes ancillary to the use of the main Studio site for film and TV production and to support other film production and/or creative industry activities. The buildings shall not be used for any other purposes, except with the express permission of the Local Planning Authority.

Reason: The site is within the Green Belt and the proposed development for studio support services for the applicant is considered to constitute very special circumstances.

28. No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence until an archaeological written scheme of investigation (WSI) for the development site has been submitted to and approved in writing by the Local Planning Authority. This shall include the following:

- i) The statement of significance and research objectives;
- ii) The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works;
- iii) Such appropriate mitigation measures indicated as necessary by the evaluation. This may include:
 - a) the preservation of any remains *in situ*, if warranted,
 - b) appropriate archaeological excavation of any remains before any development commences on the site, with provisions for subsequent analysis and publication of results,
 - c) archaeological monitoring of the groundworks of the development (also including a contingency for the preservation or further investigation of any remains then encountered),

d) and such other provisions as may be necessary to protect the archaeological interests of the site.

- iv) The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material.

No development works shall take place other than in accordance with the approved WSI.

Reason: This condition is a pre-commencement condition to ensure a record is made of any archaeological remains present, in accordance with Policy UD2 of the Watford Local Plan Core Strategy 2006-31.

- 29. No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence until a foul water drainage strategy, detailing all associated on and off site drainage works, has been submitted to and approved by the Local Planning Authority. The development shall proceed in strict accordance with the approved drainage plans and shall not be occupied / used until the drainage works are complete.

Reason: This condition is a pre-commencement condition to ensure that the sewerage system has capacity to cope with the new development and to avoid adverse environmental impacts.

- 30. Prior to commencement of any site works on the Island Site, a scheme of traffic mitigation for the existing Aerodrome Way / High Road / Ashfields signalised junction to increase capacity in general accordance with plan number 14-041-002 (Proposed Access to Island Site) in the submitted Transport Assessment (Odyssey Markides, September 2015) shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme of traffic mitigation shall be implemented prior to occupation / first use of the Island Site development.

Prior to commencement of any site works on the Island Site, full details of the proposed access arrangements to and from the existing highway network for the Island Site, consisting of a new arm on the existing Aerodrome Way / High Road / Ashfields signalised junction in general accordance with approved plan number 1184/PL/1012 A and plan number 14-041-002 (Proposed Access to Island Site) in the submitted Transport Assessment (Odyssey Markides, September 2015), shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and shall be made fully operational prior to commencement of construction on the Island Site.

Reason: This condition is a pre-commencement condition in the interests of highway safety in accordance with saved Policy T21 of the Watford District Plan 2000.

31. No works of development shall take place within the Island Site until an assessment has been carried out of the capacity at M25 Junction 21a (having regard to illustrative plan number 11012495/PHL/01 B submitted under planning application reference 5/2009/0708 to St Albans District Council) and such assessment, with full details of proposed mitigation measures if required, has been submitted to and approved in writing by the Local Planning Authority. Should the assessment identify the need for mitigation, a contribution shall be paid towards the mitigation of the impact of the assessed scheme on the capacity of M25 Junction 21a prior to commencement of the Island Site development.

Reason: This condition is a pre-commencement condition in the interests of highway safety in accordance with Policies CP1 and CP10 of the Core Strategy (adopted October 2011).

32. Prior to commencement of any site works on the Island Site, details of the measures to be incorporated into the development of the Island Site to demonstrate how 'Secured by Design' Commercial accreditation shall be achieved shall be submitted to and approved in writing by the Local Planning Authority. The

development shall be carried out in accordance with the approved details, and shall not be occupied or used until the Local Planning Authority has acknowledged in writing that it has received written confirmation of 'Secured By Design' accreditation.

Reason: This condition is a pre-commencement condition in the interests of safety and crime prevention in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

33. No construction works shall take place within the Island Site until full details of a surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority.

The surface water drainage scheme shall be based on the principles set out in the FRA carried out by Quattro Consult reference 4302 dated September 2015, Quattro Consult letters dated 16 October 2015 and 12 November 2015 and attached appendices, drawing no. 4302-ISL-002A, sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development. The drainage scheme shall demonstrate the surface water run-off generated up to and including the 1 in 100 years plus climate change critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event.

The scheme shall also include:

1. Detailed drainage plan to confirm final drainage design and location of proposed SuDS features and pipe-runs.
2. Detailed surface water drainage calculations for all rainfall events up to and including the 1 in 100 year + climate change event
3. Undertake final infiltration tests prior to the installation of the infiltration trenches to confirm infiltration rates
4. Details of how the scheme shall be managed and maintained after completion for the lifetime of the development, which shall include the arrangements for adoption by any public authority or statutory undertaker, or any other

arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime.

The scheme shall subsequently be implemented in accordance with the approved details prior to occupation / use of the development, and be permanently retained as such.

Reason: This condition is a pre-commencement condition to prevent flooding by ensuring the satisfactory storage of and disposal of surface water from the site in accordance with Policy SD2 of the Watford Local Plan Core Strategy 2006-31.

34. No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence until a Construction Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority. This Plan shall include (but not exclusively) details of:

- a development schedule including timetable of works
- parking of vehicles of site operatives and visitors
- access arrangements including the routing of vehicles away from residential roads
- management of deliveries to avoid peak times
- loading and unloading of plant and materials
- storage of plant and materials
- the erection and maintenance of security hoarding, where appropriate
- wheel washing facilities
- measures to control the emission of dust and dirt during demolition and construction
- measures to minimise noise emissions during demolition and construction
- hours of working
- the siting and type of fencing to protect all trees, hedges and habitats to be retained and all watercourses

- measures to manage ecological habitats during demolition and construction
- safe access to site offices

The Construction Environmental Management Plan shall be implemented as approved and adhered to throughout the period of works for the development.

Reason: This condition is a pre-commencement condition in the interests of the local environment and highway safety in accordance with saved Policy T21 of the Watford District Plan 2000.

35. No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence until a Site Waste Management Plan (SWMP) for all aspects of waste management during site preparation and construction has been submitted to and approved in writing by the Local Planning Authority. This shall include measures for recycling/disposing of waste resulting from demolition and construction works. The development shall be carried out in accordance with the approved SWMP throughout the period of works for the development.

Reason: This condition is a pre-commencement condition in the interests of the local environment and sustainability in accordance with Policies SD1 and SD4 of the Watford Local Plan Core Strategy 2006-31.

36. Notwithstanding the layout shown on the approved plans, prior to commencement of any site works on the Island Site, full details of all parking spaces to be provided on the site (which shall not exceed 480 car parking spaces) and details of all manoeuvring areas for service and delivery vehicles shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and the parking and manoeuvring areas retained as such thereafter.

Reason: This condition is a pre-commencement condition to ensure adequate facilities are provided in the interests of the visual amenity of the Green Belt and the site, in accordance with Policies GI2 and UD1 of the Watford Local Plan Core Strategy 2006-31.

37. No occupation or use of the buildings hereby approved shall commence until a waste management scheme, detailing the siting, capacity and design of storage areas for waste and recycled materials, and a management plan for collection, has been submitted to and approved in writing by the Local Planning Authority and this scheme has been implemented in full. These facilities shall be retained as approved at all times.

Reason: To ensure adequate facilities are provided in the interests of the visual amenity of the Green Belt and the site, in accordance with Policies GI2 and UD1 of the Watford Local Plan Core Strategy 2006-31.

38. No occupation or use of the buildings hereby approved shall commence until details of secure and weatherproof cycle storage facilities, based upon the Council's cycle parking standards within the Watford District Plan 2000, have been submitted to and approved in writing by the Local Planning Authority and these facilities have been provided in accordance with the approved details. These facilities shall be retained as approved at all times.

Reason: To ensure adequate facilities are provided in the interests of the visual amenity of the Green Belt and the site, in accordance with Policies GI2 and UD1 of the Watford Local Plan Core Strategy 2006-31.

39. No external lighting shall be installed on the site or affixed to any buildings on the site unless the Local Planning Authority has first approved in writing details of the position, height, design, intensity and time restrictions. The lighting shall be installed and operated thereafter in accordance with the approved details.

Reason: In the interests of the visual amenity of the Green Belt and the site, in accordance with Policies GI2 and UD1 of the Watford Local Plan Core Strategy 2006-31.

40. All plant, machinery and equipment installed or operated in connection with the development shall be so enclosed and/or attenuated so that noise there from does not exceed a level of 45 dB(A) during the day and 30 dB(A) during the night when measured at a distance of 1 metre away.

Reason: To ensure that the nearby residential properties are not subjected to excessive noise and disturbance having regard to saved Policy SE22 of the Watford District Plan 2000.

41. The building hereby approved shall only be used for purposes associated with film making and not for public exhibition purposes at any time.

Reason: To ensure future control of the site and having regard to potential additional impacts on the highway network that have not been assessed.

42. Notwithstanding the provisions of Schedule 2, Part 4 of the Town and Country Planning (General Permitted Development) Order 2015 (or any other order revoking and re-enacting that order with or without modification), no temporary uses of land and associated structures, other than temporary facilities and/or structures required for the purposes of filming, shall take place unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of the visual amenity of the site in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

Informatives

1. The applicant is reminded that the Control of Pollution Act 1974 stipulates that construction activity (where work is audible at the site boundary) should be restricted to 0800 to 1800 Monday to Friday, 0900 to 1300 on Saturdays and not at all on Sundays and Bank Holidays.
2. The Local Planning Authority has been positive and proactive in its consideration of this planning application, in line with the requirements of the National Planning Policy Framework and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015. The Local Planning Authority suggested modifications to the development during the course of the application and the applicant submitted amendments which result in a form of development that maintains/improves the economic, social and environmental conditions of the District.
3. It is an offence to take or disturb the breeding or resting location of protected species, and precautionary measures should be taken to avoid harm where appropriate. If protected species, or evidence of them, is discovered during the course of any development, works should stop immediately and advice sought as to how to proceed. This may be obtained from: Natural England: 0300 060 3900; the UK Bat Helpline: 0845 1300228 or Herts & Middlesex Bat Group: www.hmbg.org.uk ; Herts & Middlesex Badger Group; Hertfordshire Amphibian and Reptile Group, or a suitably qualified ecological consultant.

Badgers are protected under the Wildlife and Countryside Act 1981 (as amended) and the Protection of Badgers Act 1992, which makes it an offence to:

- Wilfully kill, injure or take a badger, or to attempt to do so;
- Cruelly ill-treat a badger; or
- Intentionally or recklessly interfere with a badger sett.

For birds, the removal of trees & shrubs should be avoided during the breeding season (March to September inclusive). If this is not possible then a search of the area should be made by a suitably experienced Ecologist and if active nests are found, then clearance must be delayed until the nesting period has finished.

For reptiles and amphibians, stored materials (that might act as temporary resting places) are raised off the ground e.g. on pallets or batons; and any rubbish is cleared away to minimise the risk of animals using the piles for shelter. Caution should be taken when moving debris piles or building materials as any sheltering animals could be impacted on.

Trenches should have escape ramps to provide an escape opportunity for any animals that may have become trapped.

4. All works required to be undertaken on the highway network will require an Agreement with the Highway Authority. Before commencing the development the applicant shall contact HCC Highways Development Management, County Hall, Pegs Lane, Hertford, SG13 8DN to obtain their permission and requirements. This is to ensure any work undertaken in the highway is constructed in accordance with the Highway Authority's specification and by a contractor who is authorised to work in the public highway.

Case Officer: Paul Baxter
Email: paul.baxter@watford.gov.uk
Tel: 01923 278284

- Planning application boundary
- Ownership boundary

TOWN PLANNING
DEVELOPMENT CONTROL

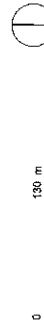
15 SEP 2015

15/01300/007M

WATFORD COUNCIL

Location plan

Warner Bros. Studios Leavesden



Dwg no: PL/224401/TOR1	Revision
02 September 2015	Drawn by: JC
	Checked by: NT
Scale: 1:5,600 @A3	

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Agenda Item 5

PART A	
Report of: DEVELOPMENT MANAGEMENT SECTION HEAD	
Date of Committee	7th January 2016
Site address:	36, Clarendon Road
Reference Number :	15/01539/FULM
Description of Development:	Erection of 6 storey building to provide 2,746 sqm of office (Class B1a) floorspace and 107sqm of floorspace for Class B1a/A1/A2 floorspace with associated car parking, cycle and bin storage and landscaping.
Applicant:	V Fund (Watford) Limited
Date received:	2nd November 2015
13 week date(major):	1st February 2016
Ward:	CENTRAL

SUMMARY

The site is located in the Town Centre SPA in the Core Strategy and within an allocated employment area (E7a) in the Watford District Plan 2000. These policies identify Clarendon Road as a prime office area and development proposals should be for Class B1 office use. The proposed mixed-use scheme comprises a 6 storey building providing 2,746m² office floorspace and 107m² commercial floorspace at ground floor for B1a/A1/A2 uses on the Clarendon Road frontage. The proposal replaces a 5 storey building (providing 2,220m² office floorspace) previously approved under planning permission ref. 14/00531/FULM for a mixed-use scheme which also included 34 residential flats. The proposal will result in an increase in the quantity and quality of office floorspace on the site compared to the previously planning permission (+526m²) and will contribute towards

providing new employment within the Borough, in accordance with the Core Strategy.

The previously approved residential element fronting Gartlet Road remains unchanged and is currently under construction. The office building has not been commenced. The reason for the application is to increase the amount of office floorspace in order to help secure investment funding for a speculative development. The design of the building is an evolution of the previously approved scheme to ensure it will make the same positive contribution to the character and appearance of Clarendon Road whilst complementing the residential element and maintaining an acceptable relationship with the existing residential properties on Gartlet Road.

The Development Management Section Head therefore recommends that the application be approved, subject to appropriate conditions, as set out in the report.

BACKGROUND

Site and surroundings

The site is located on the eastern side of Clarendon Road at its junction with Gartlet Road. Clarendon Road forms its western boundary and Gartlet Road its northern boundary. Its southern boundary abuts 34 Clarendon Road, a 4 storey office building. The application site comprises only the western part of the larger site the subject of planning permission ref. 14/00531/FULM, with its eastern boundary abutting the residential element fronting Gartlet Road that is currently under construction. The application site is approximately rectangular in shape and has an area of 0.1 hectare.

To the north, on the opposite side of Gartlet Road, 38 Clarendon Road is a 5 storey office building of red brick. To the west, on the opposite side of Clarendon Road are other 4 and 5 storey office blocks. Clarendon Road forms a direct link between the town centre and Watford Junction station. It is the main office employment area within the Borough and is characterised by multi-storey commercial buildings up to 8 storeys high but typically 4-6 storeys high. The buildings vary in age from the 1960s through to the 2000s and exhibit a

very varied range of designs and materials.

Proposed development

The previous buildings on the site, used as the Watford Registry Office, have been demolished and the application site is currently cleared and vacant. The application proposes the erection of a new 6 storey building comprising 2,746m² office floorspace and 107m² commercial floorspace at ground floor for B1a/A1/A2 uses. The proposal replaces a 5 storey building (providing 2,220m² office floorspace) previously approved under planning permission ref. 14/00531/FULM for a mixed-use scheme which also included 34 residential flats. The proposal will result in an increase in the office floorspace on the site compared to the previously planning permission of 526m². The scheme includes 27 parking spaces (an increase from 19 in the previous scheme) accessed from Clarendon Road; 20 of these spaces will be provided by the use of double stacked parking bays. The access from Clarendon Road will remain as previously approved. The previously approved residential element, which is currently under construction, remains unchanged.

Planning history

The previous buildings on the site, occupied by Watford Registry Office, comprised a Victorian villa on the Clarendon Road frontage, constructed in circa. 1865, and a 3 storey office block to the rear, constructed in the 1960s, together with a link extension to the villa. Both of these buildings were demolished in 2015.

The Estcourt Conservation Area to the east of the site (part of the residential development currently under construction falls within the Conservation Area) was designated in 2001.

13/01324/FULM – Planning permission refused in March 2014 for the demolition of existing buildings and redevelopment of the site to provide 2,220 sqm of office (Class B1a) floorspace and 36 residential flats with associated surface car parking, cycle and bin storage and landscaping for the following reason:

The proposed development, by reason of its height, massing and bulk, will have a

harmful impact on the character and appearance of the Estcourt Conservation Area to the east of the site, contrary to Policies UD1 and UD2 of the Watford Local Plan Part 1: Core Strategy 2006-31.

14/00531/FULM – Planning permission granted in June 2014 for the demolition of existing buildings and redevelopment of the site to provide 2,220 sqm of office (Class B1a) floorspace and 34 residential flats with associated surface car parking, cycle and bin storage and landscaping.

Relevant policies

National Planning Policy Framework

- Section 1 Building a strong, competitive economy
- Section 2 Ensuring the vitality of town centres
- Section 4 Promoting sustainable transport
- Section 7 Requiring good design
- Section 10 Meeting the challenge of climate change, flooding and coastal change

Hertfordshire Waste Core Strategy and Development Management Policies

Document 2011-2026

- 1 Strategy for the Provision for Waste Management Facilities
- 1a Presumption in Favour of Sustainable Development
- 2 Waste Prevention and Reduction
- 12 Sustainable Design, Construction and Demolition

Hertfordshire Minerals Local Plan Review 2002-2016

No relevant policies.

Watford Local Plan Part 1 - Core Strategy 2006-31

- WBC1 Presumption in favour of sustainable development
- SS1 Spatial Strategy

SPA1	Town Centre
SD1	Sustainable Design
SD2	Water and Wastewater
SD3	Climate Change
SD4	Waste
EMP1	Economic Development
EMP2	Employment Land
T2	Location of New Development
T3	Improving Accessibility
T4	Transport Assessments
T5	Providing New Infrastructure
INF1	Infrastructure Delivery and Planning Obligations
UD1	Delivering High Quality Design

Watford District Plan 2000

SE7	Waste Storage and Recycling in New Development
SE27	Flood Prevention
SE39	Tree and Hedgerow Provision in New Development
T10	Cycle Parking Standards
T21	Access and Servicing
T22	Car Parking Standards
E1	Employment Areas
U17	Setting of Conservation Areas

Supplementary Planning Guidance and Supplementary Planning Documents

Watford Character of Area Study (2011)

Residential Design Guide (2014)

CONSULTATIONS

Neighbour consultations

Letters were sent to 21 properties in Clarendon Road, Estcourt Road and Gartlet Road and others who commented on the previous application. One reply has been received, making suggestions for improved landscaping on the Clarendon Road frontage.

Advertisements in local paper/ site notices

One site notice was placed outside the site on 6th November 2015 on the Clarendon Road frontage. A public notice was published in the Watford Observer on 13th November 2015.

Consultations

Thames Water

With the information provided Thames Water, has been unable to determine the waste water infrastructure needs of this application. Should the Local Planning Authority look to approve the application ahead of further information being provided, we request that the following 'Grampian Style' condition be applied - "Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed". Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community.

(Note: This comment was not made in respect of the previous two planning applications).

With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is

proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required.

No impact piling shall take place until a piling method statement (detailing the type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure.

Hertfordshire County Council (Highway Authority)

Notice is given under article 18 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that the Hertfordshire County Council as Highway Authority does not wish to restrict the grant of permission subject to the conditions as per 14/00531/FULM.

Following discussions with officers of the Borough Council planning permission is now being sought to increase the amount of office floor space to 2,996sqm GEA (an increase of 656sqm or 28%). Critically for the highway authority no changes are proposed to the residential element of the permitted development, the means of access or the off-site highway works that were approved in 2014.

Transport Assessment: The potential transport implications of the proposed development are related to the likely change in travel characteristics arising from the proposed development. Previously the office accommodation on the site of about 850sqm was used as Council Offices including a Registry Office and these uses had the potential to attract a significant number of visits by members of the public.

Trip generation: The travel characteristics of the previous use were calculated as part of the Transport Statement submitted with the permitted planning application reference number 14/00531/FULM. That Transport Statement also calculated the travel characteristics of the now permitted office use.

Impact on highway network: The proposed increase in office floor space would imply a pro rata increase in vehicle trips associated with the increased office space. They predict two-way trip numbers in the morning peak of 26 and the evening of 18. These are 6 and 4 respectively higher than the numbers predicted previously. Neither these increases nor the overall trip numbers are likely to have severe impacts on the free and safe flow of traffic on the adjoining highway network.

Highway safety: The Transport Statement includes an analysis of the last 5 year's collision records. These do not indicate any significant cluster sites or specific road safety issues in the vicinity of the proposed development.

Access to the proposed office car parking will be as for the permitted scheme, via a footway crossover, onto Clarendon Road. Appropriate visibility splays of at least 2.4m by 40m will be provided to this access.

The proposed access arrangements and off-site highway works are shown in drawing number 65058-001. This drawing shows the layout agreed in discussions with Hertfordshire County Council in respect of application reference 14/00531/FULM and approved as part of the permitted development.

The permitted development included local highway improvements for pedestrians as shown on drawing number 63040-TS-003 Rev B and it is not proposed to make any amendments to these.

Refuse and service delivery: Refuse from office and residential uses will be located in secure stores on the north side of the proposed new building and it is proposed that collection of refuse will be made from Gartlet Road using a servicing and delivery lay-by just to the west of the proposed access. This lay-by will ensure that servicing vehicles will

not obstruct through traffic on Gartlet Road. It is located close to the office and residential accommodation and will be convenient for deliveries to both.

Hertfordshire County Council (Waste and Minerals Planning Authority)

Should the Borough Council be minded to permit this application, a number of detailed matters should be given careful consideration.

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

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

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

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

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

Policy 1: Strategy for the Provision for Waste Management Facilities;

Policy 1a: Presumption in Favour of Sustainable Development;

Policy 2: Waste Prevention and Reduction:

Policy 12: Sustainable Design, Construction and Demolition.

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

Waste Policy 12: Sustainable Design, Construction and Demolition requires all relevant construction projects to be supported by a Site Waste Management Plan. This aims to reduce the amount of waste produced on site and should contain information including types of waste removed from the site and where that waste is being taken to.

Hertfordshire Constabulary (Crime Prevention Design Advisor)

No comments received.

Planning Policy: Urban Design and Conservation

No comments received.

Arboricultural Officer

No comments received.

APPRAISAL

In accordance with s.38 of the Planning and Compulsory Purchase Act 2004, the Development Plan for Watford comprises:

- (a) the *Watford Local Plan Part 1 - Core Strategy 2006-31*;
- (b) the continuing “saved” policies of the *Watford District Plan 2000*;
- (c) the *Hertfordshire Waste Core Strategy and Development Management Policies Document 2011-2026*; and
- (d) the *Hertfordshire Minerals Local Plan Review 2002-2016*.

Land allocation

On the Proposals Map of the Watford District Plan the site is located within Employment Area E7a (Clarendon Road/Station Road). In the Core Strategy it is located within the Town Centre Special Policy Area (SPA1). The objectives of the Town Centre SPA are to strengthen and consolidate Watford’s position as a regional centre in the retail hierarchy; seek a more balanced provision of town centre facilities and infrastructure, including retail, leisure, entertainment and other town centre uses; seek access improvements for people of all ages, interest and backgrounds; redevelop the existing shopping centre at Charter Place; and deliver around 3,300-4,200 additional jobs in the wider town centre area in the retail, leisure, office and service sectors. Within the wider town centre, Clarendon Road is identified as the focus for office use.

The proposal is in general accordance with the land allocation in that the main use of the building is for Class B1 office use. This is acceptable in principle. At ground floor level, a small amount of floorspace, 107m, adjoining the main entrance is proposed for flexible commercial uses including Class B1 offices, Class A1 retail and Class A2 offices (financial and professional services). Class A1 and A2 uses are not in strict accordance with the land allocation, however, given the small amount of floorspace involved and the fact that they will complement the main office use, this is considered acceptable in this case. The applicant is intending that the Class A1 retail use would comprise a coffee shop or similar outlet serving the office employees within Clarendon Road. Any Class A1 or A2 use of this

size and in this location is not considered to be of a nature that will have any harmful impact on the vitality and viability of the nearby town centre.

Heritage assets

The proposal needs to be considered having regard to any potential impact it may have on the setting of the Estcourt Conservation Area to the east. The previously approved scheme comprised a 5 storey office building fronting Clarendon Road and a residential block stepping down from 6 storeys to 2 storeys fronting Gartlet Road. This block was partly sited within the conservation area which included the original 'ceremony garden' of the Registry Office. It was considered that the proposal would have no harmful impact on the setting of the Estcourt Conservation Area.

The proposed 6 storey office block will have the same footprint as the approved block, with the northern part of the block adjoining the approved 6 storey residential block. Only the southern part of the rear elevation will be visible from the conservation area and this will be seen behind the 2 storey residential blocks fronting Gartlet Road. This elevation is sited 27m from the boundary of the conservation area on the western side of Gartlet Road (now occupied by the 2 storey residential blocks) and 52m from the nearest building on the eastern side of Gartlet Road. In this context, it is not considered that the proposed block will have any greater impact on the setting of the conservation area than the approved development.

Layout and design

The layout of the site is identical to that of the approved scheme, with the proposed office block respecting the building line on the eastern side of Clarendon Road and turning the corner on to Gartlet Road. The proposed access from Clarendon Road at the southern part of the frontage, serving the car parking, remains unchanged.

The main changes are to the design of the block and these comprise:

- i) the additional storey of office accommodation,

- ii) a narrower chamfer on the corner of the building facing the road junction, and
- iii) a modification of the elevational design to accommodate these changes.

At 6 storeys, the proposed block still reflects the general scale of buildings on Clarendon Road, which vary from 4-6 storeys with the occasional taller building, and sits comfortably on this prominent junction within the road. The chamfered corner addresses the road junction appropriately and helps the building to turn the corner in an aesthetically pleasing way.

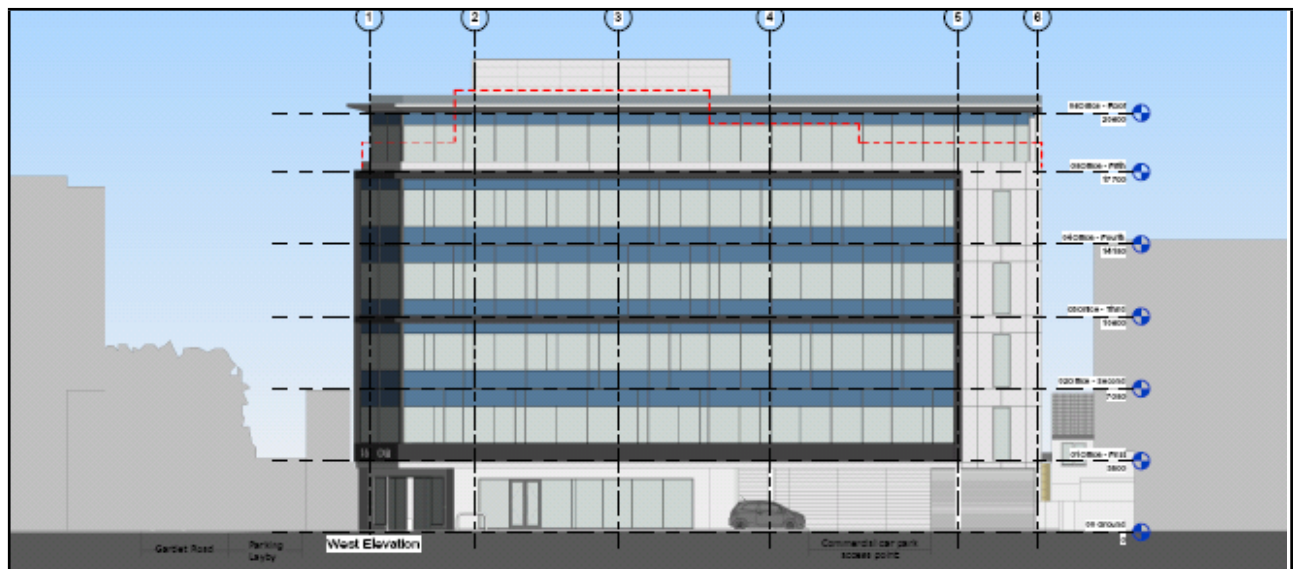


Computer generated image of proposed office building

The block maintains an acceptable relationship to the 6 storey residential block adjoining and also retains its distinctive design and materials, in contrast to the residential block, as previously approved. Overall, the proportions of the block are good, with a strong horizontal framing within the largely glazed elevations giving the building a visually clear podium level and strong roof line.



West elevation – approved scheme ref. 14/00531/FULM



West elevation – proposed scheme

Overall, the scale and design of the building and use of materials will ensure a high quality development that achieves the aspirations of the Core Strategy and will make a positive contribution to the area.

Townscape and visual impacts

Clarendon Road is characterised by large, multi-storey commercial buildings of varied age, design and materials. The proposed office block is 6 storeys high fronting onto Clarendon Road and is adjoined by a 4 storey building to the south with a 5 storey building sited to the north. Other 5 storey buildings line the western side of Clarendon Road. The siting of the building reinforces the existing building line on this side of the road and positively addresses the corner. In this context, the scale and massing of the building is in keeping with the road. As with the previously approved 5 storey block, the proposal will significantly enhance the street scene by introducing a prominent corner building of a scale that would be expected in the context of this site.

Comments received on the application have suggested improvements to the public realm on Clarendon Road, with additional tree and shrub planting incorporated. These suggestions will enhance the public realm and the appearance of the site. Measures of this nature can be secured by condition.

Impacts on adjoining properties

The proposed building will sit comfortably alongside the existing office buildings at 34 and 38, Clarendon Road and will have no adverse impact on these buildings. The potential for the greatest impacts is in respect of the residential properties in Gartlet Road. These were accessed in detail in granting the previous planning permission. The proposed office block is sited 27.5m from the rear boundary of the nearest houses in Gartlet Road, Nos. 3 and 4. This is slightly further away than the adjoining office building at No. 34 which has office windows facing these properties only 26m away from the boundary. The distance to the nearest windows in Nos. 3 and 4 is 44m. On the rear elevation, the proposal incorporates composite cladding panels and strip windows rather than curtain wall glazing to minimise further any opportunity for additional overlooking to occur. At 44m distant and sited to the

north west, the office element will have no adverse impact on natural light or outlook to these houses.

Having regard to the BRE Sunlight and Daylight Guidelines, the office block still achieves an unobstructed 25° vertical angle of view from the ground floor windows of properties in Gartlet Road. This will ensure that the daylight to these windows will not be adversely affected. Achievement of this guideline also indicates that the proposal will not give rise to a significant adverse impact on the outlook from the windows of these properties.

Flood risk and drainage

The site is located within Flood Zone 1 and is at low risk of flooding. A sustainable surface water drainage scheme to reduce and/or attenuate surface water flows can be secured by condition. This will also form an integral requirement of the BREEAM assessment.

Transport, access and parking

The site is in a highly accessible location with Watford Junction station and its associated bus interchange located 500m to the north. This gives access to a wide range of rail and bus services. Further bus services are accessible within the town centre located 250m to the south together with a full range of town centre shops, services and facilities. The site is also easily accessible by foot and cycle.

A traffic impact assessment has been undertaken as part of the submitted transport statement. This compares the predicted traffic generation of the approved office and residential scheme with the proposed, increased office floorspace and the approved residential development. This demonstrates that the increase in traffic arising from the proposed, increased office floorspace will give rise to only 3-4 additional vehicle trips during the morning and evening peak times. These increases are not significant.

As part of the previously approved proposal, a number of highways changes and improvements were proposed. Those directly relevant to the proposed office block comprised:

- i) a new access on Clarendon Road, 4.5m to the north of the existing access, to serve the car parking for the office use;
- ii) new footpath on the southern side of Gartlet Road;
- iii) a new servicing lay-by on southern side of Gartlet Road; and
- iv) the re-siting of the pedestrian crossing on Clarendon Road to the north of the existing crossing.

All of these measures are also proposed as part of the current application and remain necessary for the development to be acceptable.

The level of car parking provision originally approved for the office floorspace was 19 spaces, all at ground level and partly within an undercroft. This has been increased to 27 spaces as part of the current proposal. Some of these spaces (20) will be provided in double stacked parking bays within the undercroft of the building. This number and form of provision is acceptable.

Sustainability, energy and waste

An Energy and Sustainability Statement has been submitted with the application and includes a BREEAM pre-assessment to demonstrate how a BREEAM rating of Very Good can be achieved. A number of energy efficiency measures will be incorporated into the design to enhance the building's energy performance and reduce annual carbon emissions. The proposed offices will be served by highly efficient air source heat pumps for their heating and cooling requirements. A post-construction certificate to confirm that BREEAM Very Good has been achieved can be secured by condition.

The BREEAM assessment has waste management as an integral component and bin stores are provided as part of the development for waste and recycling bin provision. These measures will ensure that the development is of a sustainable construction and will encourage waste to be managed and reduced on site, in accordance with the policies of the County Council's Waste Core Strategy and Development Management Policies.

Community Infrastructure Levy and Planning Obligations

Community Infrastructure Levy (CIL)

The Council's CIL charging schedule was implemented on 1st April 2015 and, as such, the proposed scheme will be liable for CIL charges. The CIL charge covers a wide range of infrastructure and community facilities including education, childcare, libraries, youth facilities, open space, children's playspace, transport and healthcare. Under the Community Infrastructure Levy Regulations 2010, payments towards infrastructure and facilities covered by CIL can no longer be sought by section 106 planning obligations unless there are site specific requirements which are necessary to make the development acceptable. CIL is charged on the relevant net additional floorspace created by the development. The CIL charge is non-negotiable and is calculated at the time planning permission is granted.

The CIL charge for Class B1 office floorspace is £0m². The charge for Class A1-A5 retail floorspace is £120m². As such, the only floorspace liable to a CIL charge is the ground floor unit of 107m² which is proposed for B1/A1/A5 use. The charge for this floorspace would be £12,840.

Planning obligations under section 106

With the implementation of the Council's CIL charging schedule on 1st April 2015, section 106 planning obligations can only be used to secure affordable housing provision and other site specific requirements. Tariff style financial payments can no longer be sought. Under Regulation 122 of the Community Infrastructure Levy Regulations 2010, where a decision is made which results in planning permission being granted for development, a planning obligation may only constitute a reason for granting planning permission for that development if the obligation is:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

In the case of the current planning application, the only planning obligation necessary to make the development acceptable is the provision, as necessary, of fire hydrants to serve the development in accordance with Policy INF1 of the Core Strategy and saved Policy H10 of the Watford District Plan 2000. However, this can also be secured by means of a condition requiring a water scheme to be submitted. This is considered an acceptable alternative mechanism by the County Council and as no other planning obligations are required it is proposed to use an appropriate condition in this case.

Conclusion

The proposed office block will result in an increase in the quantity and quality of office floorspace on the site and will contribute towards providing new employment within the Borough, in accordance with the Core Strategy. Although the flexible commercial floorspace at ground floor level is, in part (Class A1/A2 uses), not strictly in accordance with the land allocation, this comprises a very small proportion of the floorspace (107m², less than 5%) and will not have any harmful effect on the overall objectives of the Core Strategy.

The proposed block, with its increased height compared to the previously approved scheme, will still have an acceptable and appropriate relationship with the adjoining residential block and will sit comfortably within the road. The block will make a positive contribution to the character and appearance of Clarendon Road through the provision of a prominent new building on this important corner site.

HUMAN RIGHTS IMPLICATIONS

The grant of permission, subject to a planning obligation and conditions, will have an impact on the human rights of the applicant to develop the land. However, this is considered justified in order to protect the human rights of third parties and to accord with the policies of the development plan. With appropriate conditions, it is not considered that

any impacts on third parties will be sufficient to override the human rights of the applicant in this instance.

RECOMMENDATION

That planning permission be granted subject to the following conditions:

Conditions

1. The development to which this permission relates shall be begun within a period of three years commencing on the date of this permission.

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

2. The development hereby permitted shall be carried out in accordance with the following approved drawings:-

9283 PL 500-010A, 500-011, 500-100, 500-101, 500-102, 500-103, 500-104, 500-105, 500-106, 500-200, 500-201.

Reason: For the avoidance of doubt and in the interests of proper planning.

3. Construction of the development hereby permitted shall not take place before 8am or after 6pm Mondays to Fridays, before 8am or after 1pm on Saturdays and not at all on Sundays and Public Holidays.

Reason: To safeguard the amenities and quiet enjoyment of neighbouring properties during the time that the development is being constructed, pursuant to Policy SE22 of the Watford District Plan 2000.

4. No development shall commence until the scheme has been registered with the Considerate Constructors Scheme and a certificate of registration has been submitted to the Local Planning Authority. The construction shall be carried out in accordance with the requirements of this scheme.

Reason: This is a pre-commencement condition to ensure suitable measures will be in place to safeguard the amenities of neighbouring properties and prevent obstruction of the adjoining highway during the time that the development is being constructed.

5. The development shall be constructed to BREEAM Very Good in accordance with the pre-assessment contained in the Energy and Sustainability Statement by Mecserve (Issue 1.0 – October 2015 – C5902). No part of the development shall be occupied until a post-completion certificate, to certify that the respective BREEAM Very Good standard has been achieved, has been submitted to and approved in writing by the Local Planning Authority.

Reason: To accord with Policies SD1, SD2 and SD3 of the Watford Local Plan Core Strategy 2013.

6. No impact piling shall take place until a piling method statement (detailing the type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority. Any piling shall only be undertaken in accordance with the approved piling method statement.

Reason: The proposed works will be in close proximity, and could cause damage, to underground sewerage utility infrastructure.

7. No development shall commence until details of the existing and proposed ground levels and the finished ground floor levels of the building have been submitted to and approved in writing by the Local Planning Authority. The development shall only be constructed in accordance with the approved details.

Reason: This is a pre-commencement condition to ensure an acceptable relationship between the proposed building, the adjoining residential development and the adjoining highway is achieved.

8. No development shall commence until details of the materials to be used for all the external finishes of the building, including all external walls, roofs, doors and windows, have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out only in accordance with the approved materials.

Reason: This is a pre-commencement condition to ensure appropriate and acceptable materials are used for the construction of the building, in the interests of the visual appearance of the site and the character and appearance of the area, in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

9. No development shall commence until a hard landscaping scheme has been submitted to and approved in writing by the Local Planning Authority. This shall include details of all means of enclosure on the boundaries of the site and within the site. No part of the development shall be occupied until the approved hard landscaping works have been carried out.

Reason: This is a pre-commencement condition to ensure appropriate and acceptable materials are used for the public realm in the interests of the visual

appearance of the site, in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

10. No development shall commence until a soft landscaping scheme has been submitted to and approved in writing by the Local Planning Authority. The approved soft landscaping works shall be carried out not later than the first available planting and seeding season after completion of the development. Any plants which within a period of five years die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, or in accordance with details approved by the Local Planning Authority.

Reason: This is a pre-commencement condition to ensure appropriate and acceptable planting is used for the public realm, in the interests of the visual appearance of the site, in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

11. No development shall commence until details of a sustainable surface water drainage scheme for the development have been submitted to and approved in writing by the Local Planning Authority. No part of the development shall be occupied until the approved drainage scheme has been implemented in full.

Reason: This is a pre-commencement condition to ensure the surface water drainage scheme forms an integral part of the development and is designed to minimise the likelihood of flooding downstream, to reduce the risk of flooding by ensuring the satisfactory storage and disposal of surface water from the site, and to reduce the impact of flooding on the proposed development in accordance with Policy SD2 of the Watford Local Plan Core Strategy 2006-31.

12. No development shall commence until a mains water services scheme for the development, including where necessary, the inclusion of fire hydrants to serve the development, has been submitted to and approved in writing by the Local Planning

Authority. The development shall only be carried out in accordance with the approved scheme.

Reason: This is a pre-commencement condition to ensure the mains water services scheme forms an integral part of the development and is designed to include, where necessary, fire hydrants to serve the development.

13. No plant or equipment shall be installed within the roof level open plant area until an acoustic assessment has been submitted to and approved in writing by the Local Planning Authority which demonstrates that the sound pressure level from the plant area will be at least 10dB below the lowest LA₉₀ (15 minute) noise level measured at 1m from the adjoining residential flats when all plant and equipment is operational. The assessment shall include appropriate noise mitigation measures. All plant and equipment shall be installed as approved and no plant or equipment shall be brought into operation until the approved mitigation measures have been installed.

Reason: To ensure the operation of the plant and equipment does not give rise to noise nuisance to the adjoining residential occupiers.

14. No part of the development shall be occupied until the following works within the site and the public highway have been completed in full, as shown in principle on drawing no. 65058-001 in Appendix C of the Transport Statement by Development Transport Planning (Project No. 65058, October 2015):
 - i) new footpath on southern side of Gartlet Road from Clarendon Road to the boundary of the application site;
 - ii) new servicing lay-by on southern side of Gartlet Road;
 - iii) new vehicular access on Clarendon Road to serve office car parking;

- iv) re-siting of pedestrian crossing on Clarendon Road to the north of the existing crossing.

Reason: To ensure safe and adequate vehicular and pedestrian access to the development and in the interests of highway safety, in accordance with Policy T4 of the Watford Local Plan Core Strategy 2006-31.

- 15. No part of the development shall be occupied until the existing vehicular junctions on Clarendon Road have been closed off and the adjacent footways and kerbs reinstated.

Reason: To ensure safe and adequate vehicular and pedestrian access to the development and in the interests of highway safety, in accordance with Policy T4 of the Watford Local Plan Core Strategy 2006-31.

- 16. No part of the development shall be occupied until a management plan to ensure that the approved lay-by is only used for refuse collection, deliveries and loading/unloading has been submitted to and approved in writing by the Local Planning Authority and the approved measures have been provided in full. These measures shall be retained as approved at all times.

Reason: To minimise danger, obstruction and inconvenience to users of the highway and pedestrians and to ensure adequate servicing access for the development, in accordance with Policy T21 of the Watford District Plan 2000.

- 17. No part of the development shall be occupied until the 27 car parking spaces shown on the approved drawings (unless otherwise approved in writing by the Local Planning Authority) have been laid out and constructed in full. These spaces shall be retained at all times for the parking cars.

Reason: To ensure adequate operational parking facilities are provided on the site, in accordance with saved Policy T22 of the Watford District Plan 2000.

18. No part of the development shall be occupied until the bin and cycle stores have been provided in accordance with the approved drawings (unless otherwise approved in writing by the Local Planning Authority). The stores shall be retained at all times for bin storage and cycle storage only and shall not be used for any other purpose.

Reason: To ensure adequate facilities are provided for the occupiers of the site and in the interests of the visual appearance of the site and its impact on the street scene and character of the surrounding area, in accordance with Policies SD1 and UD1 of the Watford Local Plan Core Strategy 2006-31 and saved Policies T10 and T21 of the Watford District Plan 2000.

Informatives

1. In dealing with this application, Watford Borough Council has considered the proposal in a positive and proactive manner having regard to the policies of the development plan as well as paragraphs 186 and 187 of the National Planning Policy Framework and other material considerations, and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2010, as amended.

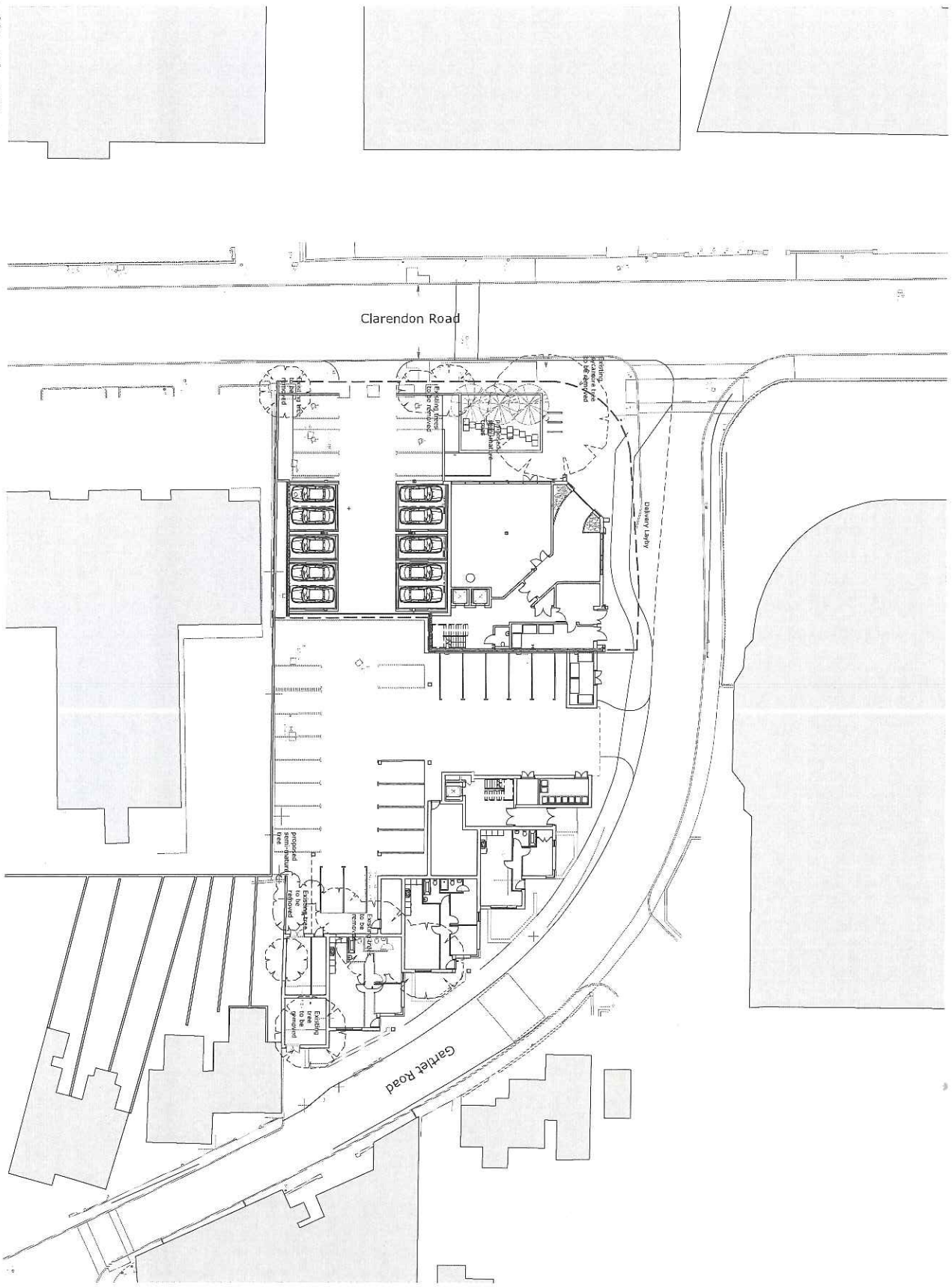
Drawing numbers

9283 PL 500-010A, 500-011, 500-100, 500-101, 500-102, 500-103, 500-104, 500-105, 500-106, 500-200, 500-201.

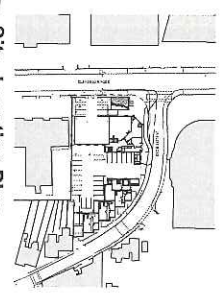
Case Officer: **Paul Baxter**

Email: **paul.baxter@watford.gov.uk**

Tel: **01923 278284**



2 Site Block Plan
 1:200



1 Site Location Plan
 1:1250

Client: **Vrand Watford Limited**

Project: **36 Clarendon Rd, Watford**
 36 Clarendon Road, Watford,
 Hertfordshire, WD07 3JL
 Planning Title: **Location Plan & Block Plan**

Date: **28/10/15**
 Author: **HO**
 Checked: **HO**
 Scale: **1:200**
 Drawing No: **9283**
 Project No: **500830**

PRC: **28/10/15 15:28:56**
 Version: **1.0**
 Status: **Final**

PART A	
Report of: DEVELOPMENT MANAGEMENT SECTION HEAD	
Date of Committee:	7th January 2016
Site address:	35-37 Marlborough Road, Watford
Reference Number :	12/01263/EXT
Description of Development:	Application to modify Section 106 planning obligations pursuant to planning permission 12/01263/EXT
Applicant:	Mr N Hussein (Gatsby Lodge Ltd)
Date received:	11th December 2015
Ward:	Central

SUMMARY

Planning permission was granted on 9th April 2013 for the renewal of planning permission ref. 09/00540/FULM for the demolition of the existing dwellinghouses and the construction of a new development of 17 flats. This planning permission was accompanied by a Section 106 Unilateral Undertaking which contained various obligations. One of these was the provision of 6 no. 1 bed flats on the site for affordable housing. The applicant has requested that the clauses relating to the provision of the affordable housing units be deleted as no Registered Provider is willing to purchase the units. This is due to the fact that the units are too small and do not meet the minimum floor areas required by the Homes and Communities Agency. In place of the on-site provision of affordable housing, the applicant has agreed to make a financial payment to the Council of £177,200 towards the provision of affordable housing or other housing to meet identified needs within the Borough. This is considered acceptable.

The Development Management Section Head recommends that the Section 106 Unilateral Undertaking be modified, as set out in the report.

BACKGROUND

Planning permission was granted on 9th April 2013 for the renewal of planning permission ref. 09/00540/FULM for the demolition of the existing dwellinghouses and the construction of a new development of 17 flats. This planning permission was accompanied by a Section 106 Unilateral Undertaking which contained the following obligations:

- £6,180 towards the provision or improvement to open space
- £1,875 towards sustainable transport measures
- £860 towards education facilities
- £40 towards childcare facilities
- £15 towards youth facilities
- £385 towards library facilities
- £2,000 to exclude the development from the controlled parking zone
- £500 monitoring fee
- Provision of fire hydrants to serve the development
- Provision of 6 no. 1 bed units for affordable housing (1 x social rent, 4 x affordable rent and 1 x shared equity by tenure)

The planning permission has not been implemented and will expire on 9th April 2016.

Under Section 106A (1)(a) of the Town and Country Act 1990 (as amended), a planning obligation may be modified or discharged by agreement between the local planning authority and the person against whom the obligation is enforceable. If the application is refused then the applicant has the right to appeal.

Site and surroundings

The site is located at the junction of Marlborough Road and Francis Road and comprises a semi-detached pair of 2 storey, late Victorian houses sited facing Marlborough Road. These are of a substantial size, incorporating accommodation in the roof served by

dormer windows and are currently in multiple occupation. Crossovers exist on Marlborough Road and Francis Road leading to small, on-site parking areas. The surrounding area is characterised by two storey, terraced, Victorian houses although the northern side of Marlborough Road comprises larger, semi-detached houses, similar to those on the application site.

Proposal

An application under Section 106A(1)(a) of the Town & Country Planning Act 1990 (as amended) to modify the affordable housing obligations set out in the Unilateral Undertaking forming part of planning permission ref. 12/01263/EXT.

It is proposed to remove the requirement to provide 6 units of affordable housing on the site and to pay the Council a sum of £177,200 towards the provision of affordable housing or other housing to meet identified housing needs in the Borough.

Planning History

08/00246/FULM – Application for the demolition of the existing houses and the erection of 16 studio flats and 4 one bed flats withdrawn in April 2008.

08/01411/FULM – Planning permission refused in February 2009 for the demolition of the existing houses and the erection of 18 flats for 3 reasons. No appeal was made against this decision.

09/00540/FULM – Planning permission was refused on 22nd September 2009 for the demolition of the existing pair of semi-detached houses and the erection of 17 flats in a three storey building for a single reason. An appeal against this decision was allowed and planning permission granted in April 2010.

12/01263/EXT - Renewal of planning permission ref. 09/00540/FULM granted in April 2013 for the demolition of the existing houses and the erection of 17 flats. This permission has not been implemented.

CONSULTATION

None.

APPRAISAL

Policy HS3 of the Watford Local Plan Core Strategy states that 35% affordable housing will be sought on all major applications. Only in exceptional circumstances will a lower provision be considered, where the developer can demonstrate exceptional planning or other constraints on the development of the site. The mix of affordable housing should be 20% social rent, 65% affordable rent and 15% shared ownership.

In this case, the applicant has been willing to provide the 6 units of affordable housing, however, he has been unable to secure a Registered Provider to purchase the units (the unilateral undertaking requires a lease to be granted of at least 125 years). He has stated that 9 Registered Providers (RPs) have been approached and all have declined to secure the units for the following reasons:

- The size of the units are too small as standards have changed since the planning permission was granted;
- No separate entrance is provided for the affordable units;
- One bedroom and single person units do not meet their demand.

The 1 bed flats within the development have internal floorareas of 32.5-39.7sqm. Advice received from the Council's Housing team states:

“RPs look at a minimum space standard for a one bed of 47-48sqm. No RP will look at one bed one person flats as they always prove hard to let and then, as is typical, the client will move a partner in and they are overcrowded.”

As such, the applicant is unable to meet the requirements of the Unilateral Undertaking and is, therefore, unable to implement the planning permission. This is a matter that is

essentially outside of the applicant's control as neither he (nor the Council) can force a Registered Provider to take a lease on the approved units which do not meet their minimum requirements and for which they would be unable to secure funding. It is therefore considered that this is an exceptional case where an alternative means of affordable housing provision should reasonably be considered by the Council. The most obvious alternative solution would be for the Council to accept a financial payment in lieu of on-site provision. Although this is not policy compliant in respect of Policy HS3, nevertheless, it is a form of provision that many other Councils accept. The difficulty is in establishing what an appropriate payment would be as the Council has no mechanism for calculating this.

The applicant has also submitted a financial viability statement with their request which seeks to demonstrate that, even without any affordable housing provision, the development would only just be viable to develop. This is based upon a number of assumptions, including a 20% uplift on existing use value for the landowner (as an incentive to sell) and a 20% profit on gross development value (GDV) for the developer. In this case, the developer (the applicant) already owns the site and, therefore, there is no need to include a 20% uplift for the landowner as an incentive to sell. This amounts to £177,200 in the viability appraisal, based upon the calculated existing use value of £886,000. Within the viability appraisal, the applicant would benefit from both the landowner uplift and developer profit. In order to off-set the proposed loss of the 6 affordable units from the site, it has been agreed that a payment equivalent to the landowner uplift will be paid to the Council. This is considered to be a reasonable approach to take in the circumstances.

The Council is currently in the process of setting up a joint venture partnership with the Watford Community Housing Trust to deliver affordable housing and other housing to meet identified needs within the Borough. One project that is currently being investigated is the provision of temporary accommodation for homeless persons that the Council has a legal duty to house. The payment proposed as a modification of the Unilateral Undertaking

could be put towards the delivery of this project or another affordable housing project within the Borough.

Human rights implications

The Local Planning Authority is justified in interfering with the applicant's Human Rights in order to achieve a policy compliant scheme that meets housing needs within the Borough. With regard to any infringement of third party Human Rights, these are not considered to be of such a nature and degree as to override the Human Rights of the applicant and therefore warrant refusal of planning permission.

RECOMMENDATION

That the Unilateral Undertaking forming part of planning permission ref. 12/01263/EXT be modified by a Deed of Variation as follows:

1. Deletion of Clauses 3.1(e) and (f).
2. Insertion of a new Clause 3.1(e) with the following wording:

“3.1(e) On commencement of the development to pay to the Council the sum of £177,200 (one hundred and seventy seven thousand and two hundred pounds) towards the provision of Affordable Housing in the Borough of Watford or other housing to meet identified housing needs in the Borough.”

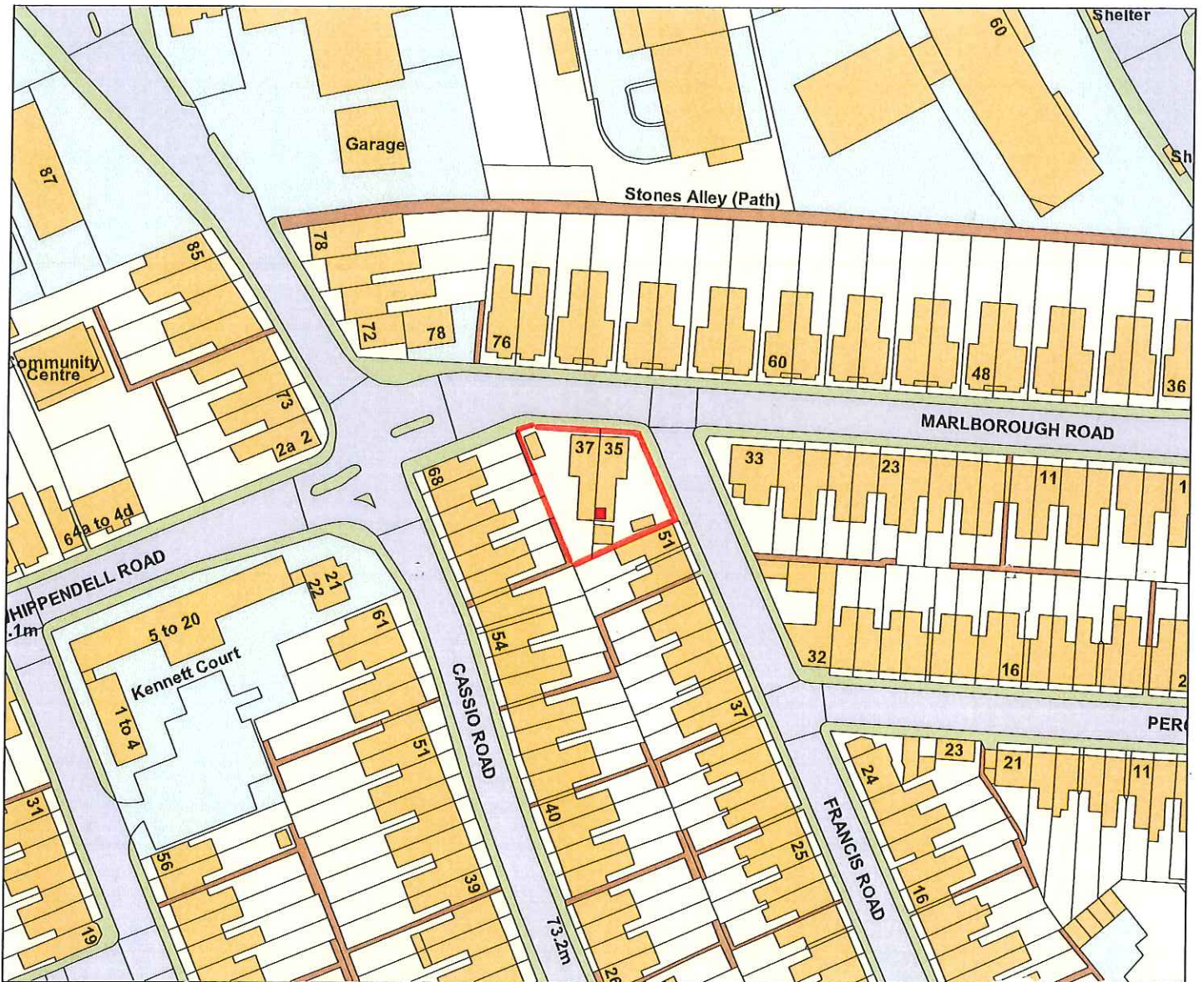
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35/37 Marlborough Road

12/01263/EXT



GIS by ESRI (UK)



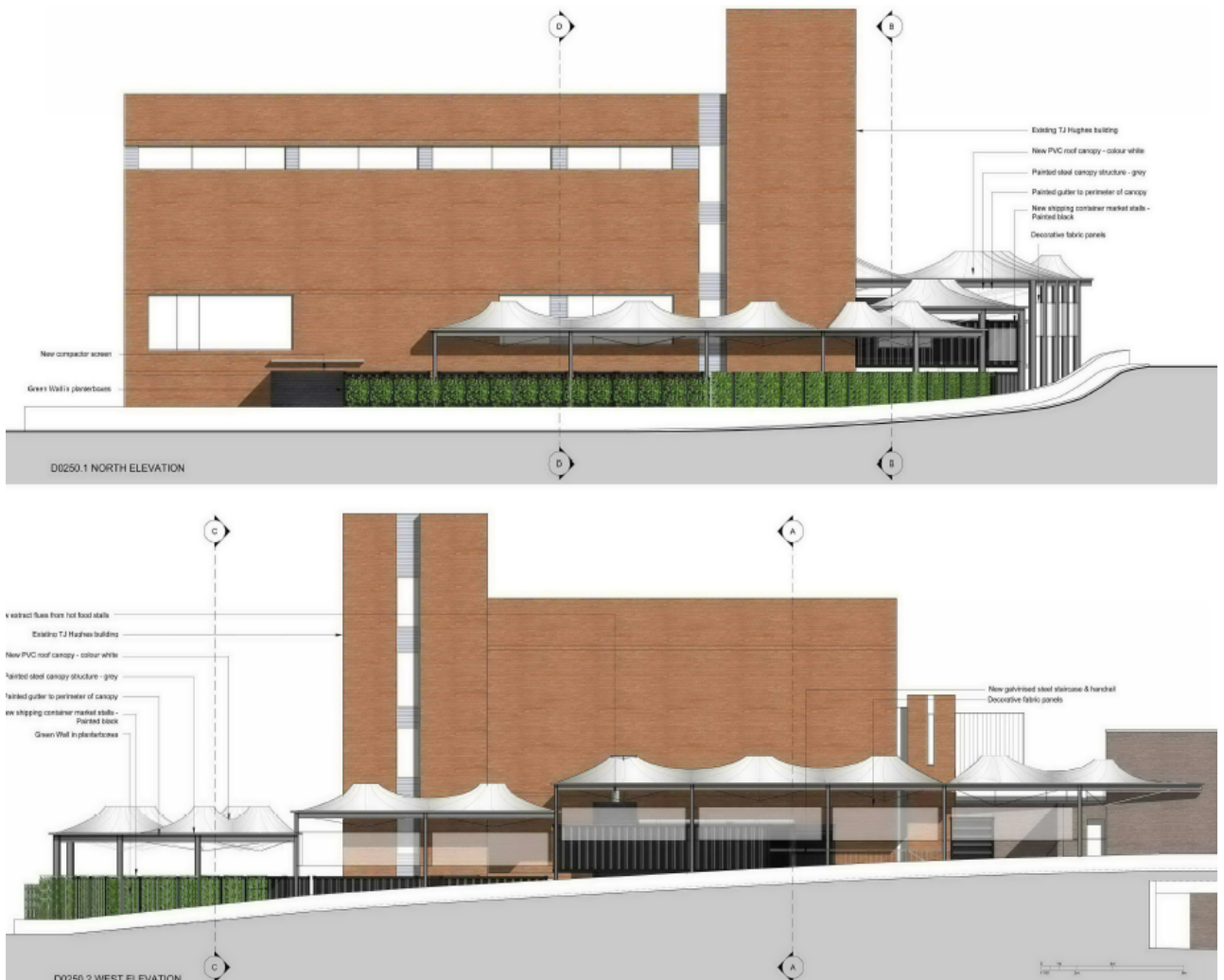
PART A	
Report of: DEVELOPMENT MANAGEMENT SECTION HEAD	
Date of Committee	7th January 2016
Site address:	Watford Market, Watford House Lane, Watford
Reference Number :	15/01160/ADV
Description of Development:	Install 11 advertising panels with market graphics above the containers in the existing market.
Applicant:	Watford Borough Council
Date received:	18th August 2015
8 week date:	13th October 2015
Ward:	CENTRAL

1.0 SITE AND SURROUNDINGS

1.1 The application relates to Watford Market, which is a covered permanent market that was granted conditional planning permission in August 2014 under reference 14/00861/FUL. Watford Market is located within the Town Centre Primary Shopping Area, as identified in Figure 6 of the Watford Local Plan Core Strategy 2006-31. The market stalls consist of black shipping containers and the market is covered by PVC canopy roofs with supporting structures. The canopy structure has metal framework. The rear part of the market is at ground floor only, however the front part towards the main entrance from the High Street is over two levels. The first floor part consists of a food court with a number of hot food stalls and an outdoor seating area.

1.2 The market is close to Exchange Road, which is a busy Class A Main Distributor road. The first floor food court is fairly exposed to wind, rain and noise because of its close proximity to Exchange Road, which has an impact on the use of the outdoor seating area.

1.3 The application site is not within a designated Conservation Area and there are no listed buildings within the application site. The Civic Core Conservation Area abuts the other side of the Exchange Road flyover and the adjoining buildings at Nos. 9 – 37 are Locally Listed.



Elevations approved under planning application 14/00861/FUL.

2.0 PROPOSED DEVELOPMENT

2.1 The application proposes the installation of woven polyester mesh panels on the road-facing side of the market. The panels would be positioned between the vertical framework of the canopy structure and would be beneath the canopy roofs. All of the panels are proposed to display advertisements and have the following dimensions.

Number of panels	Width (metres)	Height (metres)
4	7	4.1
2	7	2.6
5	7	1.4

2.2 The largest of the panels would be the southern most end of the market where the market has two storeys. Moving northward, the next two panels would have a height of 2.6 metres with the remaining 5 panels adjacent to Beechen Grove having a height of 1.4 metres.

2.3 All of the advertising panels have writing on them. In the top right hand corner there is “New Watford Market”, which has a height of 41cm. In the middle of the panel is the wording “New Watford Market is ...Delicious/Evolving/Vibrant/Eclectic”, which has a height of 30cm and at the bottom of each banner are the social media details having a height of 20cm. All banners will have colourful artwork behind the black wording as shown below.



3.0 RELEVANT PLANNING HISTORY

3.1 The following planning history is relevant to this application:

15/01159/FUL – To be withdrawn as all of the panels are to have advertising on them and therefore planning permission is not required.

14/00861/FUL - Revised application of planning permission 13/01067/FUL for an increase in the height of the canopy roof by 1.5m and slight changes to the materials (canopy is now PVC and not PTFE as before). Conditional Planning Permission. August 2014.

13/01067/FUL - Change of use from car parking to a mixed retail use covered outdoor market comprising fixed stalls under a steel and fabric canopy and portable market stalls in High Street, including arrangements for servicing and access from Watford House Lane and Beechen Grove. Conditional Planning Permission. December 2013.

4.0 PLANNING POLICIES

Development plan

4.1 In accordance with s.38 of the Planning and Compulsory Purchase Act 2004, the Development Plan for Watford comprises:

- (a) *Watford Local Plan Core Strategy 2006-31*;
- (b) the continuing “saved” policies of the *Watford District Plan 2000*;
- (c) the *Hertfordshire Waste Core Strategy and Development Management Policies Document 2011-2026*; and
- (d) the *Hertfordshire Minerals Local Plan Review 2002-2016*.

4.2 The *Watford Local Plan Core Strategy 2006-31* was adopted in January 2013. The *Core Strategy* policies, together with the “saved policies” of the *Watford District Plan 2000* (adopted December 2003), constitute the “development plan” policies which, together with any relevant policies from the County Council’s *Waste Core Strategy* and the *Minerals Local Plan*, must be afforded considerable weight in decision making on planning applications. The following policies are relevant to this application.

4.3 **Watford Local Plan Core Strategy 2006-31**

WBC1	Presumption in favour of sustainable development
SS1	Spatial Strategy
SPA1	Town Centre
SD1	Sustainable Design
TLC1	Retail and Commercial Leisure Development
UD1	Delivering High Quality Design
UD2	Built heritage Conservation

4.4 **Watford District Plan 2000**

U15	Buildings of Local Interest
U25	Advertisements and Signs

4.5 **Hertfordshire Waste Core Strategy and Development Management Policies Document 2011-2026**

No relevant policies.

4.6 **Hertfordshire Minerals Local Plan Review 2002-2016**

No relevant policies.

4.7 **Supplementary Planning Documents**

The following Supplementary Planning Documents are relevant to the determination of this application, and must be taken into account as a material planning consideration.

4.8 *Watford Character of Area Study*

The Watford Character of Area Study was adopted in December 2011. It is a spatial study of the Borough based on broad historical character types. The study sets out the characteristics of each individual character area in the Borough, including green spaces. It is capable of constituting a material consideration in the determination of relevant planning applications.

4.9 **National Planning Policy Framework**

The National Planning Policy Framework sets out the Government's planning policies for England. The following provisions are relevant to the determination of this application, and must be taken into account as a material planning consideration:

Achieving sustainable development

The presumption in favour of sustainable development

Core planning principles

Section 1 Building a strong, competitive economy

Section 2 Ensuring the vitality of town centres

Section 7 Requiring good design

Para 67 states that “Poorly placed advertisements can have a negative impact on the appearance of the built and natural environment. Control over outdoor advertisements should be efficient, effective and simple in concept and operation. Only those advertisements which will clearly have an appreciable impact on a building or on their surroundings should be subject to the local planning authority’s detailed assessment. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.”

Section 11 Conserving and enhancing the natural environment

Section 12 Conserving and enhancing the historic environment

Decision taking and Determining Applications

5.0 CONSULTATIONS

5.1 Neighbour consultations

The following properties were notified:

23 - 33 The Parade High Street, Watford, WD17 1LQ,

5.2 The following is a summary of the representations that have been received:

Number of original notifications:	1
Number of objections:	0
Number in support:	0
Number of representations:	0
TOTAL REPRESENTATIONS:	0

No representations have been received.

5.3 **Statutory publicity**

A site notice was posted outside the main entrance to Watford Market on 1st September 2015. The site notice expired on 22nd September 2015.

5.4 **Technical consultations**

The following responses have been received from technical consultees:

Hertfordshire County Council (Highway Authority)

The planning application is for 11 non-illuminated hanging signs within Watford Market area. The proposed signs are outside the highway boundary and will have no effect on the free and safe flow of traffic. Highway Authority does not wish to restrict the grant of consent.

6.0 **APPRAISAL**

6.1 **Main issues**

The main issues to be considered in the determination of this application are:

(a) impact on public safety

(b) impact on amenity

(a) impact on public safety

The National Guidance states that advertisements are intended to attract attention but should not affect public safety in respect of distracting road-users. The advertising panels are non-illuminated and are located within the site of the market and therefore are not likely to be distracting to road-users. The four largest advertising panels (7m x 4.1m) and the two medium advertising panels (7m x 2.6m) are parallel with Exchange Road, which is one way heading in a northerly direction and therefore the panels are not likely to be viewed by drivers (refer photo below). The advertising panels will be located behind the highway barrier between the supporting structure of the roof canopy. The largest panels will block the first floor seating area which is considered to be an improvement to public safety as there is potentially less distraction to drivers. This is due to the advertising panels blocking views into the seating area where people could distract drivers passing at any time. The advertising panels are considered to improve safety in this regard. It could be argued that

the writing and artwork on the panels is not necessary and clear panels could achieve the same result. The artwork will provide some animation to the locality without distracting drivers and therefore is considered acceptable in these circumstances.



The five smaller advertising panels (7m x 1.4m) will be located in the gap between the

landscaping and the lowest part of the roof canopy (refer photo below). Some of these panels will be parallel to drivers on Exchange Road travelling east towards Beechen Grove.



For drivers travelling east along Beechen Grove, the advertising panels will be partially visible behind the existing traffic signs (refer photo below). While the advertising panels will

be near a junction, all road-users will be travelling in an easterly direction and therefore there are less traffic hazards. It is not considered that the advertising panels will create any distraction to road-users.



The National Guidance on advertising identifies main areas where advertisements may cause danger to road users. These include impairing or obstructing sight-lines; being confusing to road-users; providing insufficient clearance above a highway; being illuminated; incorporating moving elements; located on narrow footpaths; resembling traffic signs; resemblance to directional signs. The application has been assessed taking these elements into consideration and it is concluded that the advertising panels should not be refused on public safety grounds.

The Highways Authority have not raised any concerns with the proposed advertising panels.



(b) impact on amenity

In the case of the proposed advertising panels, the visual amenity needs to be considered in regard to any residents or passers-by being impacted by the 11 advertising panels. The photos above show the location of the proposed advertising panels from the public highway where there is very limited pedestrian access. The photo below shows long views towards the site from Gaumont Approach adjacent to Sainsbury's. This is the main vantage point for pedestrians viewing the larger advertising panels. The other area where the advertising panels will be visible is from Jury's Inn located on the corner of Beechen Grove and Clarendon Road. It is not considered that the advertising panels will have any significant impact on the amenity of nearby residents or passers-by due to the distance from residential properties and the lack of pedestrian access adjacent to the panels.

The panels will be most viewed by people in vehicles using the ring road. The rear elevation of the market to the ring road currently presents the rear of the containers and views into the market with its various wares. The panels will screen these views and provide some visual benefit. It is not considered that they will adversely affect the visual

amenity of drivers.



The National Guidance on advertising states that other potential amenity issues to consider is the impact on scenic, historic, architectural or cultural features. The site is adjacent to locally listed building at 9 - 37 The Parade (former TJ Hughes building) and is opposite the Civic Core Conservation Area, which is located to the north-west of Exchange Road. The advertising panels will not be attached to the adjoining locally listed building but they will interrupt views of this building.

In regard to cultural features, one of the main reasons for the advertising panels is to improve the environment of the local market for stallholders and customers. The provision of the advertising panels will help reduce the impact of inclement weather helping to improve the local market which has been an attraction of Watford for many years, albeit now in a new location.

Whilst the advertising panels will improve the amenity of the users of the market, there is some concern that there will be a cumulative impact due to the number of advertising panels with regard to street clutter. The panels are setback from the road and will have the appearance of hoardings which are normally granted for a limited period to block development sites or untidy land. The proposed advertising panels are unique in regard to

not doing either of these but merely to improve the environment of the market and advertise the market at the same time.

Whilst consent for advertising normally lasts for 5 years, a local planning authority has discretion to grant consent for a shorter or longer period. To ensure that the advertising panels do not have a permanent impact on the visual amenity of the locality or views of the locally listed building and the adjoining conservation area, it is proposed to limit the consent to three years and review the advertising panels again. This limited consent will also ensure that there is a limit to the cumulative impact of the advertising panels, particularly in considering other applications for advertising hoardings that may be received in the future.

7.0 COMMUNITY INFRASTRUCTURE LEVY AND PLANNING OBLIGATION

7.1 Community Infrastructure Levy (CIL)

The Council introduced the Community Infrastructure Levy (CIL) with effect from 1 April 2015. The CIL charge covers a wide range of infrastructure as set out in the Council's Regulation 123 list, including highways and transport improvements, education provision, youth facilities, childcare facilities, children's play space, adult care services, open space and sports facilities. CIL is chargeable on the relevant net additional floorspace created by the development. The charge is non-negotiable and is calculated at the time that planning permission is granted.

Liability to CIL does not arise in the case of a development where the increase in gross internal area is less than 100sqm, unless the development comprises one or more dwellings. The proposed development would not create an increase in floor area, therefore there is no CIL charge in this case.

8.0 CONCLUSION

8.1 The application for the advertising panels has been carefully considered in the context of the relevant planning policies and guidance and it has been established that the proposal will not have any significant impact on public safety. With regard to amenity of residents

and passers-by, the proposal is not considered to have any long-term significant impact.

- 8.2 The cultural benefits of providing screening to the market have also been identified. However it is considered that there may be long-term impacts on the adjoining locally listed building and adjacent conservation area as well as having a cumulative impact and for this reason it is proposed to limit the consent to three years.

9.0 HUMAN RIGHTS IMPLICATIONS

- 9.1 The Local Planning Authority is justified in interfering with the applicant's human rights in order to alleviate any adverse effect on adjoining properties and their occupiers and on general public amenity. With regard to any infringement of third party human rights, these are not considered to be of such a nature and degree as to override the human rights of the applicant and therefore warrant refusal of planning permission.

10.0 RECOMMENDATION

That advertisement consent be **GRANTED** subject to the following conditions:

1. This consent is granted for a period of three years from the date of this consent notice.

Reason: To comply with Regulation 14 (7) of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 as amended.

2. No advertisement is to be displayed without the permission of the owner of the site on which they are displayed;
3. No advertisement is to be displayed which would obscure, or hinder the interpretation of, official road, rail, waterway or aircraft signs, or otherwise make hazardous the use of these types of transport;

4. Any advertisement must be maintained in a condition that does not impair the visual amenity of the site;
5. Any advertisement hoarding or structure is to be kept in a condition which does not endanger the public; and
6. Once the advertisement is removed, the site must be left in a condition that does not endanger the public or impair visual amenity.

Reason: To comply with Schedule 2 of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 as amended.

Informatives

1. In dealing with this application, Watford Borough Council has considered the proposal in a positive and proactive manner having regard to the policies of the development plan as well as paragraphs 186 and 187 of the National Planning Policy Framework and other material considerations, and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2010, as amended.

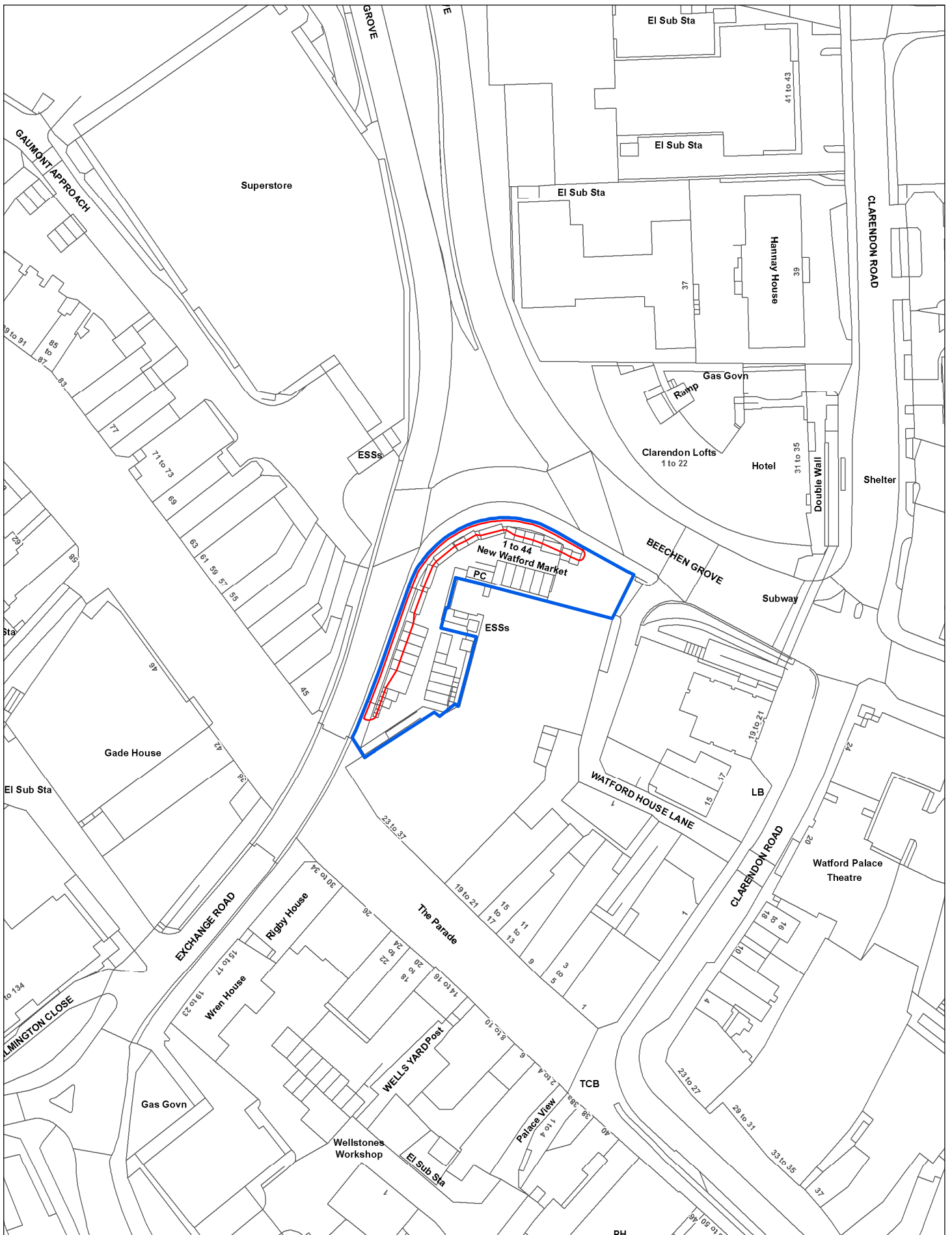
Drawing numbers

Ordnance Survey, 06288684-S-170, 06288684-S-171 Rev B, 06288684-S-172 Rev B, 60288684-S-173 Rev B, 60288684-S-174 Rev B, 60288684-S-176

Case Officer: **Fiona Dunning**

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Watford Market

Produced by ****, Corporate GIS, **** 2015



Scale: 1:1,250
at A4

0 0.004 0.008 0.012 0.016
Kilometers

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