

PART A	
Report of: <b>Head of Development Management</b>	
Date of committee:	<b>5<sup>th</sup> July 2017</b>
Site address:	<b>765, St Albans Road</b>
Reference Number:	<b>17/00495/FULM</b>
Description of Development:	<b>Demolition of showroom and offices and the erection of a part 3 storey, part 4 storey building comprising 23 flats with car parking.</b>
Applicant:	<b>Mr Thornhill, Winreb Finance</b>
Date Received:	<b>13<sup>th</sup> April 2017</b>
13 week date (major):	<b>13<sup>th</sup> July 2017</b>
Ward:	<b>Stanborough</b>

## **1.0 Site and surroundings**

- 1.1 The site is located at the junction of St Albans Road and Sheepcot Lane and comprises a van sales business (Watford Vans). The site includes single storey ancillary and office buildings and a large canopy which derives from the site's former use as a petrol filling station. A large proportion of the site is given over to the display of vans for sale. Vehicular access is from St Albans Road.
- 1.2 The site adjoins semi-detached bungalows on Sheepcot Lane to the west and a 3 storey block of flats at Rochester Drive to the north. Opposite the site on St Albans Road are 3 storey blocks of flats and 2 storey houses. To the south-west is the open space of Stanborough Park.

## **2.0 Proposed development**

- 2.1 To demolish the existing buildings and erect a part 3 storey, part 4 storey building comprising 23 flats, with a mix of 9 x 1 bed and 14 x 2 bed flats. The proposed building has roughly an L-shaped footprint comprising 2 main elements fronting the respective road frontages joined by a stepped central element addressing the corner. The whole building is of a contemporary design with a flat roof. An amenity area is shown within the 'L' of the building to the rear.
- 2.2 The existing access junction to St Albans Road is to be retained and modified to give

access to 23 car parking spaces. A bin and cycle store is also proposed within the parking area.

### **3.0 Relevant planning history**

3.1 The following planning history is relevant to this application:

04/00108/COU – Conditional planning permission granted in September 2004 for a change of use from a garage/petrol forecourt to vehicle sales.

06/01084/FULM – Application for the demolition of the workshop offices and canopy and erection of 23 flats with 25 underground car parking spaces withdrawn in March 2007.

08/00381/FULM – Planning permission refused in July 2008 for the demolition of the showroom and offices and the erection of 18 flats with car parking. An appeal against this decision was dismissed in May 2009.

08/01136/FULM – Conditional planning permission granted in December 2008 for the demolition of the showroom and offices and erection of 16 flats with car parking.

16/01363/FULM – Application for demolition of showroom and offices and the erection of a part 3 storey, part 4 storey building comprising 23 flats with car parking. Withdrawn in December 2016.

### **4.0 Planning policies**

#### **4.1 Development plan**

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 Part 2: Publication Version* was published in July 2016. This has been subject to 3 rounds of public consultation – Nov-Dec 2013, Dec 2014-Feb 2015 and Dec 2015-Feb 2016. It contains development management policies and

site allocations. The emerging policies and site allocations in this document can be given limited weight at this time.

#### 4.3 **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.

- *Residential Design Guide*
- *Watford Character of Area Study*

### 5.0 **Consultations**

#### 5.1 **Neighbour consultations**

Letters were sent to 56 properties in St Albans Road, Rochester Drive and Sheepcot Lane. Two letters of representation have been received raising the following concerns:

Representations	Officer's response
Junction of St Albans Road and Sheepcot Lane is already heavily congested.	The Highway Authority has raised no objections.
Character of St Albans Road is being spoilt by blocks of flats.	This section of St Albans Road is very mixed in character and includes blocks of flats built over the past 30 years.
Style of architecture is not in keeping with the area.	The character and appearance of this section of St Albans Road is very mixed in style of buildings and materials.
Loss of light and view to flats opposite.	The flats opposite are a sufficient distance to have no impact on light. The proposed flats will be visible but will not have any harmful impact.
Strain on utility services.	Thames Water has raised no objection on grounds of capacity.
Insufficient car parking will lead to overspill parking in surrounding developments.	The management of parking in surrounding developments is a private matter.

#### 5.2 **Statutory publicity**

The application was publicised by a site notice posted on 28<sup>th</sup> April 2017 and by

advertisement in the Watford Observer published on 28<sup>th</sup> April 2017. The site notice and newspaper periods expired on 19<sup>th</sup> May 2017.

### 5.3 **Technical consultations**

The following responses have been received from technical consultees:

#### 5.3.1 Hertfordshire County Council (Highway Authority)

Hertfordshire County Council as Highway Authority does not wish to restrict the grant of permission subject to the imposition of suggested conditions.

#### 5.3.2 Hertfordshire County Council (Lead Local Flood Authority)

In the absence of a surface water drainage assessment, they object to this application and recommend refusal of planning permission until a satisfactory surface water drainage assessment has been submitted.

#### 5.3.3 Thames Water

Raise no objections to the proposal.

#### 5.3.4 Policy team

Raise a number of objections and concerns regarding the proposal. These are referred to in the report.

#### 5.3.5 Environmental Health

Have requested a standard condition to secure an assessment of land contamination and any appropriate mitigation measures. Have also requested a noise assessment be submitted to assess noise from road traffic and the adjacent electricity sub-station.

## 6.0 **Appraisal**

### 6.1 **Main issues**

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

- (a) Principle of development.
- (b) Character and appearance of the area.
- (c) Layout and design.
- (d) Housing mix and affordable housing.
- (e) Quality of accommodation for future occupiers.
- (f) Impacts on adjoining properties.
- (g) Access, servicing and parking provision.
- (h) Surface water drainage.

## 6.2 (a) Principle of development

The site is not an allocated housing site but there is no objection in principle to the development of this site for residential use. Although the site has a long history of commercial use, it is a small, undesignated site within a primarily residential area. It meets several of the criteria for windfall housing sites in that it is consistent with the spatial strategy, is previously developed land, is close to local services and close to public transport. Planning permission has also previously been granted for the development of the site for residential use.

6.2.1 Policy HS2 gives guidance on the mix of housing units sought across the borough in order to provide for the needs of the whole community. The Strategic Housing Market Assessment 2010 identified a housing mix requirement for the borough as 25.8% 1 bed, 18.7% 2 bed and 48.2 % 3 bed. The scheme provides 9 x 1 bed units (39%) and 14 x 2 bed units (61%). This is a significant improvement over the previous scheme, which proposed 19 x 1 bed and 4 x 2 bed flats, although the 2 bed units are only 3 person and only just meet the minimum floorspace for 2 bed units under the nationally described space standards.

6.2.2 Whilst it is accepted that in town centre locations and locations within the designated Special Policy Areas within the Core Strategy the vast majority of units will be 1 and 2 bed, in suburban areas a significant provision should be made for family sized units, whether in the form of flats or houses. Given the location of the site within an established suburban area, the majority of the units should be 2 bed or larger and suitable for families.

## 6.3 (b) Character and appearance of the area

The site lies on a prominent corner at the junction of St Albans Road and Sheepcot Lane. The surrounding area is predominantly residential and is characterised by detached and semi-detached housing constructed in the 1930s. Along St Albans Road, in the vicinity of the site, are several blocks of flats and flatted sheltered accommodation built in the 1980s-2000s. These blocks are typical of their age and generally uninspiring although the block at Melia Close to the south is more successful.

6.3.1 The existing site, comprising a large canopy and dominated by parked vans, makes no positive contribution to the character and appearance of the area. A new residential building of good design and materials would be a significant enhancement to the locality. Although a block of up to 3 storeys was previously approved in 2008, a building up to 4 storeys could be acceptable in principle given the prominence of the site. St Albans Road bends at the junction with Sheepcot Lane and, subsequently, a prominent building on this site would act as a focal point within the streetscene from both the south and the north.

### 6.3.2 The Urban Design and Conservation Manager has commented as follows:

*The use of the site for a flatted scheme is acceptable and broadly speaking the height proposed works across the site. The use of a simple form is welcomed and the use of a flat roof for the scheme is acceptable as well. This should provide opportunities for solar panels or a green roof. The building line follows that of Sheepcot Lane along that part of the frontage and is then staggered through the central piece to turn the corner between the two front access paths and then uniform to the vehicle access. This works better than previous approaches which have looked for a stronger central element. In massing terms the approach is acceptable but the layout and form of the building needs further work.*

*The simple shapes proposed are acceptable in principle but the building lacks any meaningful articulation and there is no attempt to provide any private amenity areas. The comments relating to the previous scheme suggest that consideration should be given to the inclusion of recessed balconies which would provide articulation to the elevations and some private amenity areas. This has not been taken on board and as a consequence we have quite uniform and bland elevations in places. With some attention to better articulation and amending the internal layout acceptable elevations could be achieved.*

*Whilst this version of the scheme does perform better in terms of massing and form than previous iterations it still falls short in terms of meeting requirements for good design; it is adequate at best.*

### 6.4 (c) Layout and design

The layout of the site follows that of the previously approved scheme, with the proposed building sited on the corner addressing both St Albans Road and Sheepcot Lane. The building has a roughly L-shaped footprint comprising 2 main elements fronting the respective road frontages joined by a stepped central element addressing the corner. An amenity area is shown within the 'L' of the building to the rear. The existing access junction at the northern end of the St Albans Road frontage is used to access the parking area which adjoins the building and the amenity area. Overall, this siting and layout is considered acceptable in principle, however, the increased size of the building footprint and the dominance of the car parking are considered to give rise to a very cramped site.

#### 6.4.1 Although the building is set back from the frontages of Sheepcot Lane and St Albans Road, it is very close to the western boundary with 4, Sheepcot Lane, directly abuts the car parking area, and provides very little open amenity space (see paragraphs 6.6.2-6.6.3 below). The proposed car parking area of 23 spaces also visually

dominates the site. Two parallel rows of 11 and 12 spaces are shown with a 6m separation. No soft landscaping is shown between the spaces (in the form of shrubs or trees), no soft landscaping along the northern boundary, with the parking spaces hard up against the boundary, the retained sub-station and the cycle store, and no soft landscaping along the flank elevation of the building, with 7 of the parking spaces hard up against the flank wall. The number of parking spaces and lack of soft landscaping within and around the parking area means the parking area visually dominates the site and results in a poor quality layout.

- 6.4.2 In terms of design, the building is largely 4 storeys, stepping down to 3 storeys at its western end as it approaches 4, Sheepcot Lane, with a flat roof. This is considered to be a more acceptable design than the previous proposal which incorporated curves roofs. The external material is brick for all the elevations. However, there are still concerns that the quality of the building is not sufficient for this prominent corner site. The Urban Design and Conservation Manager has commented as follows:

*The current scheme has reverted back to brick as the predominant material for the elevations which is welcomed and goes some way to improving the design quality of the proposed building. The applicant's architect had attempted to take on board the suggestions regarding the taking cues from the London Vernacular guide but has failed to really understand how to create a simple yet interesting and high quality scheme. The change to a more simple palette of materials is welcomed and in principle this approach is acceptable subject to details and samples being submitted and agreed.*

*Where the scheme needs more work is in the design of the elevations and the design of the fenestration:*

*Windows: The use of larger windows breaks up the elevation, but the French door style windows should be supported by access to a private amenity area. We would expect the windows to either have deep reveals or to project from the main façade and we would expect some details of this at this stage.*

*Main elevations: Some effort has been made to break up the brick sections by some form of relief panels – but it is not clear what this will be. The shape of these is a little crude and emphasises the horizontal line rather than the vertical which makes the building feel quite blocky. The north and west elevations are particularly poor and need further consideration. The principal elevations would benefit from the addition of recessed balconies which would provide greater interest and some private amenity area which the units currently lack.*

*Entrance points: where it is possible we would encourage ground floor units to have their own separate front doors as this is better from a safety perspective*

*Roof: The use of a flat roof is acceptable and we would encourage the addition of solar panels or green roof technology. It is not clear how the top of the elevation will interface with the roof or how the rainwater will be disposed of. We would expect more detail on these issues than has been provided.*

*In conclusion and with regard to the NPPF and local plan policies, the materials proposed are an improvement on previous schemes and dependent on the actual materials chosen would be acceptable in principle. However, the detailing of the building of the building elevations should be revisited along with the internal layout.*

6.4.3 Finally, the northern flank elevation comprises a 4 storey high elevation 17.4m deep containing only small, high level windows. This elevation appears very massive and will be clearly visible within the streetscene from the north. The scale of the elevation and the lack of appropriate detailing means the building will appear as a visually dominant feature within the streetscene. Overall, the design of the building lacks the quality of design and detailing for this prominent location.

#### 6.5 (d) Housing mix and affordable housing

As the scheme provides more than 9 units, Policy HS3 requires 35% of the units to be provided for affordable housing. For a scheme of 23 units, this equates to 8 units. The 35% provision should ideally have a tenure breakdown of 20% for social rent, 65% for affordable rent and 15% for intermediate tenures. The size of units should also meet current need. The application form states that all of the units are to be for private sale. The submitted drawings show the proposed building has 2 entrances, with one on the Sheepcot Lane frontage serving 9 units and one on the St Albans Road frontage serving the remaining 14 units. As such, the scheme has been designed in a way that would allow the 9 units to be affordable, served off a separate entrance, subject to an appropriate Section 106 obligation to secure these.

6.5.1 If these 9 units were to be for affordable housing, their suitability would need careful consideration. Firstly, no tenure breakdown has been given. The greatest need in Watford is for social rented and affordable rented tenures. Due to current high sales values, shared ownership products do not meet urgent housing needs at the present time. At least 7 of the 9 units should be for social and affordable rent. Furthermore, the greatest and most urgent need in the borough is for 2 bedroom units to house families with young children. In this case, the 9 units served off the Sheepcot Lane entrance comprise 4 x 1 bedroom units and 5 x 2 bedroom, 3 person units. As such, these units would not meet current urgent housing need and would



not be acceptable to the Council's Housing team.

6.6 (e) Quality of accommodation for future occupiers

All of the proposed flats have been designed to meet or exceed the nationally described space standards for 1 bed, 2 person units (50m<sup>2</sup>) and 2 bed, 3 person units (61m<sup>2</sup>). The scheme incorporates predominantly single aspect units. In terms of outlook and privacy, all of the units are considered to be acceptable. Those single aspect units facing St Albans Road or Sheepcot Lane are set back between 4-8m from the edge of the highway with appropriate soft landscaping providing a buffer. This is considered to give acceptable outlook and privacy to these units.

- 6.6.1 In respect of natural light, for several of the flats this will be significantly reduced. Although the majority of the flats face south or east, 4 of the flats are single aspect and north facing and will receive no direct sunlight. Four of the other flats are single aspect and west facing, sited immediately to the north of and adjoining the southern element of the building. These main living areas will, as a consequence, be heavily overshadowed by the proposed building and suffer reduced daylight as well. Overall, it is not considered that these various flats, 8 in total, will receive acceptable levels of natural light.
- 6.6.2 The proposal does include a communal amenity area for the residents to the rear of the building and located between the 2 wings. It adjoins the car park and has a useable area of only 118m<sup>2</sup>. The usability of this area will be reduced further by the need to maintain privacy to ground floor windows. Other areas are provided around the building, particularly along the St Albans Road and Sheepcot Lane frontages, but these are not suitable for use as private amenity space, providing instead a landscaped setting for the building.
- 6.6.3 The Residential Design Guide sets out minimum area guidelines for communal amenity space which equates to an area of 365m<sup>2</sup> for the proposed development. Whilst it is accepted that in town centre locations the level of amenity space provided is often very limited, in suburban locations such as this there is every opportunity to provide sufficient and high quality amenity space for future residents. In this case, the proposed level of provision is 247m<sup>2</sup> below the guideline. Furthermore, the area is enclosed on its southern and eastern sides by the 4 storey elements of the building meaning the area will also be heavily overshadowed and will receive little direct sunlight for most of the day. Finally, it is also adjoined by the car park with parking spaces sited along its northern boundary. Overall, it is considered that this will provide a small, substandard, overshadowed area of amenity space of little value to future residents.

6.7 (f) Impacts on adjoining properties

The site is adjoined by only 2 properties, the bungalow at 4, Sheepcot Lane and the 3 storey block of flats at Rochester Drive.

6.7.1 In respect of 4, Sheepcot Lane, this is sited on slightly higher ground compared to the application site. The proposed building is sited 2.2-2.6m from the site boundary and 3.4-3.8m from the flank elevation of this bungalow. The flank elevation of the bungalow includes 3 windows which are secondary windows. Nevertheless, they do provide light and outlook to the property. In the appeal decision from 2009 relating to a scheme for 18 flats, the appeal Inspector considered that the close siting of the proposed building to these windows (2.0-2.5m in this case) would have an overbearing impact, reducing outlook compared to the existing situation.

6.7.2 In the scheme approved in December 2008 for 16 flats, prior to the appeal decision, this distance had been increased to 4.5-5.0m and the element of the building closest to the bungalow reduced to a 1.5 storey element with pitched roof. Using the Building Research Establishment's vertical 25° rule from the flank windows of the bungalow, a 25° line taken from these windows was not breached by the proposed building. On this basis, it was considered that the natural light and outlook from these windows would not be significantly harmed.

6.7.3 The current application achieves a distance of only 3.4-3.8m and increases the height of this element of the building to 3 storeys. This will result in a significant breach of a 25° line taken from the flank windows of the bungalow and a loss of natural light and outlook. As such, the impact on the flank windows of the bungalow is not considered acceptable.

6.7.4 In respect of Rochester Drive, this 3 storey block is sited 18m due north of the proposed building with its flank elevation facing the site and the flank elevation of the proposed building. There are only secondary windows on this elevation and the proposal will have no adverse impacts on these residential flats.

6.8 (g) Access, servicing and parking provision

The existing access junction on St Albans Road is to be retained and modified. The transport statement submitted with the previous application (none was submitted with the current application) demonstrated that this will provide full visibility in both directions (2.4m by 90m) and will allow all vehicles to enter the site in forward gear. A turning head has also been provided within the site which is sufficient to allow a refuse vehicle 9.85m long to turn within the site and exit in forward gear. This will enable the site to be serviced from within clear of the highway.

6.8.1 Parking has been provided within the site for the future occupiers. The previous

transport statement demonstrated that the 23 spaces can be accessed satisfactorily with adequate manoeuvring space to allow all cars to enter and exit the site in forward gear. The provision of 23 spaces for 23 flats is acceptable. St Albans Road and the lower part of Sheepcot Lane adjacent to the site are subject to waiting restrictions. Given that St Albans Road is an A Class road (A412), it would not be acceptable for overspill parking to occur on the highway. The provision of 1 space per flat is therefore acceptable and is within the Council's maximum parking standards.

6.8.2 A bin store is shown adjacent to the site entrance and a cycle store is located at the rear of the parking area. Both are acceptable in principle but no details have been provided at this stage.

#### 6.9 (h) Surface water drainage

As a major development of 10 or more dwellings, the application proposal is required to provide a sustainable surface water drainage scheme to reduce the risk of flooding. No scheme has been provided with the application. The County Council as the Lead Local Flood Authority (LLFA) is a statutory consultee and has objected to the application due to the failure to provide a sustainable surface water drainage scheme.

### **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.

7.1.1 The CIL charge applicable to the proposed development is £120 per sqm. The charge is based on the net increase of the gross internal floor area of the proposed development. Exemptions can be sought for charities, social housing and self-build housing. If any of these exemptions is applied for and granted, the CIL liability can be reduced.

#### **7.2 S.106 planning obligation**

The Council introduced the Community Infrastructure Levy (CIL) with effect from 1 April 2015. On and from this date, s.106 planning obligations can only be used to secure affordable housing provision and other site specific requirements, such as

the removal of entitlement to parking permits in Controlled Parking Zones and the provision of fire hydrants.

- 7.2.1 The proposed development is one where affordable housing should be provided, in accordance with Policy HS3 of the Watford Local Plan Part 1 Core Strategy 2006-31.
- 7.2.2 In addition, the proposed development is one where Hertfordshire County Council, in pursuance of its duty as the statutory Fire Authority to ensure fire fighting facilities are provided on new developments and that all dwellings are adequately served by fire hydrants in the event of fire, seeks the provision of hydrants required to serve the proposed buildings by means of a planning obligation. The requirements for fire hydrant provision are set out within the County Council's *Planning Obligations Toolkit* document (2008) at paragraphs 12.33 and 12.34 (page 22). In practice, the need for hydrants is determined at the time the water services for the development are planned in detail and the layout of the development is known, which is usually after planning permission is granted. If, at the water scheme design stage, adequate hydrants are already available no extra hydrants will be needed.
- 7.2.3 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.
- 7.2.4 The provision of affordable housing is directly related to the proposed development, and is fairly and reasonably related in scale and kind to that development. It is also necessary to make the development acceptable in accordance with the Council's planning policies.
- 7.2.5 As the County Council's requirement for the provision of fire hydrants accords with the provisions of the *Planning Obligations Toolkit*, this obligation is also directly related to the proposed development and is fairly and reasonably related in scale and kind to that development. It is also necessary to make the development acceptable in accordance with the County Council's statutory duty as the Fire Authority.

## **8.0 Conclusion**

- 8.1 There is no objection in principle to the development of this windfall site for housing subject to a high quality design. It is a prominent corner site and a building up to 4 storeys is considered acceptable in principle. The existing access junction on St Albans Road is to be retained and modified and this is also acceptable.
- 8.2 The proposed scheme, however, is not considered to be of the quality of design, layout and accommodation necessary for this prominent site. The design of the proposal is considered to be inadequate for this prominent corner site; the layout of the site is poor with a cramped and visually dominant parking layout and an insufficient and heavily overshadowed amenity area; the proposed mix of unit sizes, with a predominance of small, 1 and 2 bed flats, is unacceptable in this location; the level of amenity provided for future occupiers is poor with a significant number of units experiencing inadequate levels of natural light; there is no affordable housing provision; the proposal will have an adverse impact on the adjoining property at 4, Sheepcot Lane; and no sustainable surface water drainage scheme has been incorporated.
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## **9.0 Human Rights implications**

- 9.1 The refusal of planning permission will have an impact on the human rights of the applicant to develop the land. However, this is considered justified in order to accord with the policies of the development plan and in the wider public interest.
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## **10.0 Recommendation**

That planning permission be refused for the following reasons:

1. The proposal is not considered to be of high design quality, lacking appropriate fenestration and detailing, and appears very cramped within the site. As such, the proposal is considered out of keeping with the character and appearance of the area, contrary to paragraph 58 of the NPPF and Policy UD1 of the Watford Local Plan Core Strategy 2006-31.
2. The layout of the site is cramped and poor with a visually dominant parking layout, lacking any soft landscaping, and an amenity area that is significantly inadequate in size and heavily overshadowed. As such, the proposal is out of keeping with the character and appearance of the area, contrary to

paragraph 58 of the NPPF and Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

3. The proposed mix of unit sizes, with a predominance of small, 1 and 2 bed flats, is unacceptable in this suburban, out of centre location where family sized units should be provided. As such, the proposal is contrary to paragraph 50 of the NPPF and Policy HS2 of the Watford Local Plan Core Strategy 2006-31.
4. The level of amenity provided for future occupiers is poor, with a significant number of units experiencing inadequate levels of natural light, and the insufficient provision of useable amenity space. As such, the proposal is contrary to paragraph 17 of the NPPF, Policy UD1 of the Watford Local Plan Core Strategy 2006-31 and the Watford Residential Design Guide 2016.
5. The proposal fails to provide affordable housing units to meet urgent housing needs within the Borough, contrary to paragraph 50 of the NPPF and Policy HS3 of the Watford Local Plan Core Strategy 2006-31.
6. The proposal will have an adverse impact on the flank windows of the adjoining property at 4, Sheepcot Lane, by reason of loss of outlook and natural light, due to the scale and siting of the western element of the proposed building. As such, the proposal is contrary to paragraph 17 of the NPPF and the Watford Residential Design Guide 2016.
7. No sustainable surface water drainage scheme has been incorporated into the proposal to reduce the risk of flooding both in the present and in the future, contrary to paragraphs 99 and 103 of the NPPF and Policy SD2 of the Watford Local Plan Core Strategy 2006-31.

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**Drawing numbers**

Site location plan

2667/RRP1, 2667/RRP2, 2667/RRP3

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