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| PART A   |  |
| Report of: <b>Head of Development Management</b> |  |
| Date of committee:                               | <b>29th November 2017</b>  |
| Site address:                                    | <b>Land to the rear of Ye Corner</b>   |
| Reference Number:                                | <b>17/00654/FULM</b>   |
| Description of Development:                      | <b>Demolition of existing buildings and redevelopment of site to create 15 residential units with associated works</b> |
| Applicant:                                       | <b>Ye Corner Limited</b>   |
| Date Received:                                   | <b>1st June 2017</b>   |
| 13 week date (major):                            | <b>31st August 2017</b>  |
| Agreed extended deadline:                        | <b>1st December 2017</b>   |
| Ward:  | <b>Oxhey</b>   |

## **1.0 Site and surroundings**

- 1.1 The application site comprises an irregular-shaped parcel of land, covering an area of 0.16 hectares, located to the northwest of the junction where Chalk Hill meets Aldenham Road, and situated behind numbers 1-11 Ye Corner and numbers 44 and 46 Aldenham Road.
- 1.2 Within the site, there is a two storey, brick-built building and single storey workshop buildings constructed using various materials including corrugated metal. All of the existing buildings are occupied by businesses providing different services for motor vehicles such as repairs, servicing and tyre fitting.
- 1.3 The properties immediately to the south and east of the site which front Chalk Hill and Aldenham Road respectively form a parade of shops. This parade consists of a pair of two storey, semi-detached properties known as 44 and 46 Aldenham Road, a terrace of three storey buildings (nos 1-8 Ye Corner), a separate terrace of three storey properties (9-11 Ye Corner) and a two storey building (12 Ye Corner) which is attached to the western side of the aforementioned terrace. All of these neighbouring properties incorporate a commercial unit at street level with residential accommodation on the upper floors, with the exception of the premises at 12 Ye Corner which is wholly occupied by a business use (over two floors). Some of these properties also incorporate residential units that sit behind their commercial units including properties at nos 2 and 9 Ye Corner.

- 1.4 Vehicular access to the site is provided by entrances on both the Chalk Hill and Aldenham Road frontages. The Chalk Hill access passes through a narrow gap in the parade between nos 8 and 9 Ye Corner. This entrance serves those businesses that occupy the workshops within the main part of the site. It also serves the rear entrances of some of the properties that front Chalk Hill and Aldenham Road. The Aldenham Road access serves the businesses occupying those buildings along the northern edge of the site and also a residential dwelling, known as 48 Aldenham Road, which lies to the north of the site.
- 1.5 There is a change in levels across the site with the access road along its northern edge occupying an elevated position when compared to the main part of the site to the south.
- 1.6 The site is located approximately 1.2 kilometres from Watford Town Centre and less than 250 metres from Bushey Railway Station.
- 1.7 The site is located outside of the Oxhey Conservation Area which lies to the east. It also does not encompass any listed buildings. However, 14-16 Chalk Hill – located 30 metres to the west of the site, is a Grade II listed building. The nearby buildings at 18 Chalk Hill – to the west of the site, and 48 Aldenham Road – to the north, are locally listed.

## **2.0 Proposed development**

- 2.1 The application seeks full planning permission for the demolition of the existing buildings and the redevelopment of the site to create 15 residential units with associated works.
- 2.2 The 15 residential units will be provided by way of two buildings – one being part two storey and part three storey and containing 11 flats (those identified on the submitted drawings as being Units 1-4, 7-10 and 13-15) and the other being two storey and containing 4 flats (Units 5-6 and 11-12) – see proposed site layout in Appendix 1.
- 2.3 The new buildings will front a central courtyard area that will be occupied by two loading/delivery bays and a hard-surfaced turning area to allow vehicles using the loading bays to manoeuvre on-site. The courtyard area will also comprise cycle storage, bin storage, communal amenity space and soft landscaping.
- 2.4 An additional bin store will be housed adjacent to Unit 12 (and to the rear of the properties known as 44 and 46 Aldenham Road) and this will be accessed from the

Aldenham Road access. Two car parking spaces will be provided adjacent to Unit 12 (and to the rear of 46 Aldenham Road), also served by the Aldenham Road access, and these will serve existing leaseholders.

- 2.5 The two blocks will be separated by a gap of 1.7 metres. This gap will provide a walkway and steps to allow access through the site – between the main central courtyard area and the elevated service road which runs along the northern edge of the site.
- 2.6 Those ground floor flats labeled as Units 1-3 on the submitted drawings will benefit from having direct access to their own private amenity areas.

### **3.0 Relevant planning history**

- 3.1 A pre-application enquiry was received in September 2016 for the demolition of the existing commercial buildings and the redevelopment of the site to create new residential units (Ref. 16/01367/PREAPP). The Local Planning Authority responded to this enquiry in November 2016 and advised that the principle of a car-free residential development in this location was acceptable. However, it was felt that the pre-application submission did not demonstrate that a suitable living environment would be achieved for the future occupiers of the development without compromising the amenities of the occupiers of neighbouring properties and did not suitably address access constraints. The applicant was encouraged to enter into pre-application discussions with the Local Highway Authority.

### **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 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:

*Residential Design Guide (RDG)*

*Watford Character of Area Study*

*Locally Listed Buildings in Watford*

*Commuted Sums Supplementary Planning Document*

#### 4.4 **National Planning Policy Framework**

The National Planning Policy Framework (NPPF) 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 6 Delivering a wide choice of high quality homes

Section 7 Requiring good design

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

Section 11 Conserving and enhancing the natural environment

Section 12 Conserving and enhancing the historic environment

Decision taking

4.5 In January 2016 the Council received the South West Hertfordshire Strategic Housing Market Assessment and associated Economic Study 2016 (SHMA) which set out an Objectively Assessed Need (OAN) for housing in the Borough that exceeds the levels in the Core Strategy. The Court of Appeal has recently confirmed that a "realistic prospect" of a site coming forward within the required timeframe will be sufficient to meet the deliverability test set by national planning policy, thereby endorsing an earlier decision of Mr Justice Ouseley ( *St Modwen Developments Limited v Secretary of State for Communities and Local Government & Ors. Case Number: C1/2016/2001* ). Officers have undertaken a recent review of the housing supply having regard to these judgements and are of the view that the Council is able to demonstrate a 5 year supply based on the OAN. Accordingly, the Council's housing policies can be considered up to date.

## 5.0 Consultations

### 5.1 Neighbour consultations

Letters were sent to 156 properties surrounding the application site.

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

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| Number of original notifications: | 156 |
| Number of objections:             | 17  |
| Number in support:                | 0   |
| TOTAL REPRESENTATIONS:            | 17  |

The points that have been raised are summarised and considered in the table below.

| Representations   | Officer's response  |
|---|---|
| Loss of privacy to neighbouring properties.                                       | See section 6.7 of the report.  |
| Detrimental impact on locally listed building at 48 Aldenham Road.                | See section 6.4 of the report.  |
| Site could not be accessed by a fire appliance and is high risk in event of fire. | See section 5.4.2 of the report.  |
| Loss of light to neighbouring properties.   | See section 6.7 of the report.  |
| Impact on outlook of neighbouring properties.                                     | See section 6.7 of the report.  |
| Exacerbate traffic, congestion and on-street parking on surrounding roads.        | See section 6.9 of the report.  |
| Inadequate access causing danger to road users.                                   | See section 6.9 of the report.  |
| Inadequate car parking.   | See section 6.9 of the report.  |
| Overdevelopment.  | All of the proposed units meet the minimum internal space standards for one bedroom and two bedroom units as set out within the RDG. Suitable separation will be provided between the new blocks of flats and the neighbouring properties so as to ensure that the development does not appear cramped. |

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|   | As such, it is not considered that the proposal constitutes an overdevelopment of the site.  |
| Roads, schools, doctors' surgeries, hospitals, recreational spaces, trains, local services, amenities and infrastructure cannot cope with these extra dwellings.  | The development is liable for the Community Infrastructure Levy (CIL) and the developer will be required to provide a CIL payment towards local infrastructure to help offset the impacts of the development on local services.  |
| Does not offer any aesthetic or social benefits.  | It is considered that the proposal will enhance the visual amenity of the area as set out in section 6.3 of the report. The development will have a social benefit in that it will provide new housing in a sustainable location.  |
| Residents moving into these properties do not have any outdoor space and so are spending recreational time in unsuitable areas which causes anti-social behaviour and is not conducive to harmonious neighbourly relations. | Amenity space will be provided as set out in section 6.5 of the report.<br><br>There is no evidence to suggest that the development will result in anti-social behaviour. Any acts of crime or anti-social behaviour would need to be reported to the relevant authorities. This is not a material planning consideration.   |
| New developments cause mess, dust, debris, disruption, noise, fumes, pollution and disturbance to neighbours causing health risks.  | The planning system should not be operated to duplicate controls which are the statutory responsibility of other bodies such as the Local Highway Authority, the Local Authority's Environmental Health Department etc. Informative notes are to be attached to the decision notice (see section 9 of the report) to advise the developer of their obligations under highways and environmental legislation. |
| Will cause damage to vehicles associated with neighbouring business.  | This is not a material planning consideration, nor is there any reason to presume this would be the case.  |
| Flats adjacent to neighbouring workshop will suffer from loss of privacy, loss of quiet enjoyment due to noise.   | The workshop and surrounding residential properties have co-existed for many years. It is unlikely that the workshop would be operational during the generally quieter evening or early morning periods. As such,  |

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|  | <p>the workshop is unlikely to cause any significant disturbance to future occupiers of the development, particularly given the noise attenuation measures proposed – see section 6.5 of the report.</p> <p>In terms of privacy, the ground floor level unit nearest to the retained workshop to the north of the site (Unit 10) will have only two windows on its northeast-facing elevation. These will serve a bathroom and a shower room and could be fitted with obscure glazing to prevent overlooking. Additionally, occupiers of this flat may wish to add blinds or use other means of screening inside the windows to increase privacy levels further within these non-habitable rooms. The workshop will cause no significant privacy issues for other units given its relationship with them and the positions of their windows.</p> |
| The two car parking spaces associated with the neighbouring business will not be accessible if works are carried out.  | See section 6.9 of the report.   |
| Create a high number of changing residents which upsets the local demographics and harmony of existing residents. Short-term residents do not care for their local community and take no responsibility for their local community or neighbours. | This would not form a reason for refusal of the application. It is accepted that one and two bedroom flats may be subject to a higher turnover of occupants when compared to larger, family-sized houses. However, there is a demand for flats of this size and they form an important component of the housing stock.   |
| The Council does not provide adequate facilities to keep current properties or areas in an acceptable clean and tidy state so how would they cope with even more?  | The Council provides a street cleaning and refuse collection service and maintains the public parks and open spaces. However, it is the responsibility of individual owners to maintain their own private property.  |
| Character of area will be lost and it will become a less desirable place to live. Detrimental to local   | It is considered that the visual amenity of the area will be enhanced as set out in section 6.3 of the report. The current   |

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| area and community.  | buildings and uses occupying the site do not contribute positively to the character of the area and therefore there is no objection to their loss. It is considered that the proposal will have no detrimental impact on the community as the proposed residential use will remain compatible with the surrounding residential uses.  |
| Disruption to access of neighbouring workshop resulting in loss of income to business.   | Any right of way would need to be respected and kept free of obstruction unless agreement is reached between the concerned parties. This would be a civil matter between the parties involved. In any case, the two new parking spaces to be accessed off the northern service road will each measure 5 metres in depth and cars will be able to be parked here without encroaching into the access road – see section 6.9 of the report for further details. |
| No ownership of the access road along the northern side of the site and there is no right of way to the proposed development site. | This is not a planning consideration.   |
| Reduce security of neighbouring property.  | Hertfordshire Constabulary's Crime Prevention Design Service has been consulted and has not raised any objection to the proposal. Furthermore, the new residential units will provide natural surveillance within the area which could help increase the security of neighbouring properties.   |
| Drainage and water pressure is an ongoing issue in the area.   | These are matters for the relevant utility companies to resolve. Incidentally, Thames Water has been consulted and has confirmed that they have no objection with regard to sewerage infrastructure capacity.   |
| Broadband connection is slow and the proposal will worsen this.  | This matter is for the relevant broadband supplier to resolve. The addition of 15 new units is unlikely to have any detrimental effect on the broadband service to properties within the area.  |
| Concerns with siting and scale of  | See section 6.3 of the report.  |



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### 5.3 **Statutory publicity**

The application was publicised through the display of site notices at various points around the site and by a notice published in the Watford Observer on 9<sup>th</sup> June 2017. The site notice period expired on 7<sup>th</sup> July 2017 and the newspaper notice period expired on 30<sup>th</sup> June 2017.

### 5.4 **Technical consultations**

The responses received from technical consultees are set out below. Some of the matters raised by consultees have required an officer response. In such cases, the officer has either provided comments (in brackets) in the section below or the matters are discussed further in the 'Appraisal' section of the report.

#### 5.4.1 Local Highway Authority (Hertfordshire County Council)

The Local Highway Authority had originally objected to the proposal (response dated 23<sup>rd</sup> June 2017) based on concerns that the access from Chalk Hill appeared to be too narrow and consequently could result in disruption to the A411 or may result in a vehicle striking the adjacent building.

Following the review of additional turning diagrams and other information including photographs provided by the applicant, the Local Highway Authority issued a revised response (dated 24<sup>th</sup> August 2017) which removed their objection subject to suggested conditions.

#### 5.4.2 Fire & Rescue Service

The Fire & Rescue Service no longer responds to planning application consultations – as per their written advice to Local Planning Authorities dated 31<sup>st</sup> August 2017. This is because it is the role of the Local Highway Authority (as a statutory consultee) to ask for the involvement of a fire and rescue service regarding access issues as it is recognised that by meeting the need of the fire and rescue service the access requirements for all emergency service are met. Notwithstanding the above, a representative from the Fire & Rescue Service has provided comments on the proposal advising that an appliance would not be able to access the site. However, they have further advised that if the fire crews were able to park on the main roads and access on foot from there, only units 3 and 9 would be beyond the 45m requirement and therefore they are likely to require a rising main in the premises beyond the reach of 45m.

So far as water supply is concerned, the Fire & Rescue Service would require that the development is within 100m of an existing hydrant or that hydrants are provided within 90m of the entry point to any building on site without a rising main.

**{Officer comment:** The developer will need to satisfy current Building Regulations which include making sure that developments meet the relevant fire protection/safety standards. The planning system cannot be relied upon to deal with matters that are otherwise covered by a separate regime or approval process (in this case Building Regulations) and therefore there are no planning grounds to refuse the application based on the lack of access into the site for fire appliances. In any case, preliminary comments have been obtained from Hertfordshire Fire & Rescue Service which indicate that the proposed layout is likely to be acceptable from a fire-fighting point of view with the installation of a riser(s) within the site. Such measures would be secured under the Building Regulations approval process.

It should also be noted that the existing access points are to remain unaltered and, at present, the site cannot accommodate fire appliances despite there being industrial activities taking place within it. It is reasonable to assume that the established uses on the site (or future occupiers of the units), particularly those associated with the motor trade, could rely on the storage of oil or other flammable substances. The existing buildings also do not appear to have been built to modern standards which poses a risk in itself. The introduction of new residential accommodation here, that incorporates modern fire protection measures including the installation of new riser(s) within the site, has the potential to improve levels of safety for residents.}

#### 5.4.3 Arboricultural Officer

The Arboricultural Officer has confirmed that no trees protected by a Tree Preservation Order will be affected and has no objection to the development subject to suggested conditions to secure a landscaping scheme, a detailed schedule of tree work and details of the no-dig construction method to be used for the works in the southwestern corner of the site near to a neighbouring group of trees.

#### 5.4.4 Hertfordshire Constabulary

The Design Out Crime Officer has recommended that the entrance is gated and well lit to deter offenders having easy access and that the bin store is made secure and positioned away from the side of the building to prevent the bins being used for burglary or arson. It is also recommended that the development be built to the

physical security of Secured by Design part 2, which is the police approved minimum security standard.

**{Officer comment:** The entrance to the site from Chalk Hill will serve not only the new residential development but also the rear entrances/yard areas associated with those properties fronting Chalk Hill and Aldenham Road. Without the full agreement of all stakeholders, the Local Planning Authority would not wish to insist on a gate being installed across the access. It is felt that natural surveillance of the site will be provided by both the new flats and the existing surrounding flats which will help to deter acts of crime. Furthermore, a gate installation is likely to make an already restricted access even more restricted.

With regard to bin storage, further details of its exact size, siting and type are to be secured by condition. Both bin stores are located within close proximity to buildings and could, potentially, be used to access roofs and upper floor windows/balconies. However, the siting of the bin stores has been chosen to minimise their impact on visual amenity and to ensure that they are in locations that allows them to be conveniently accessed by the refuse collection teams and residents. Amending the siting of the stores is likely to result in them having a greater visual impact and could mean that they are less accessible. As above, it is felt that the surrounding units that overlook the bin storage areas will help to deter acts of crime.

The developer has the opportunity, and is encouraged, to obtain Secured by Design certification but there is no planning policy that requires this. }

#### 5.4.5 Environmental Health

No objection subject to suggested condition requiring a mechanical ventilation system integrating cooling so as to protect residents from poor air quality and noise.

#### 5.4.6 Hertfordshire County Council Minerals & Waste

Has requested a Site Waste Management Plan (SWMP) is secured for the development.

**{Officer comment:** A SWMP is not considered necessary for a scheme of this scale.}

#### 5.4.7 Lead Local Flood Authority

No objection to the proposed surface water drainage scheme, subject to appropriate conditions being imposed to secure the measures set out within the

submitted Surface Water Drainage Strategy.

#### 5.4.8 Contaminated Land Officer

No objection subject to conditions being imposed to reduce any potential for contamination risks.

#### 5.4.9 Waste Team

Confirmed that the proposed bin storage areas are acceptable in terms of capacity and siting (for collection).

#### 5.4.10 Thames Water

No objection.

#### 5.4.11 Hertfordshire County Council Developer Services

Has outlined the potential financial contributions to be provided towards local services which are to be collected through the Community Infrastructure Levy (CIL).

#### 5.4.12 Environment Agency

The Environment Agency originally objected to the proposal (response dated 19<sup>th</sup> June 2017) based on concerns that insufficient information had been provided to demonstrate that the risk of pollution to controlled waters would be acceptable.

The applicant subsequently submitted additional information and following a review of this, the Environment Authority issued a revised response (dated 12<sup>th</sup> July 2017) which removed their objection subject to suggested conditions.

#### 5.4.13 Planning Policy – Design & Conservation

The Urban Design & Conservation Manager considers the scheme to be acceptable in principle and has commented that the development offers a creative approach to design on a difficult site. The Urban Design & Conservation Manager suggested amendments to the landscaping and siting of the cycle parking.

{**Officer comment:** Amendments have been made to the landscaping and cycle parking during the course of the application, in line with the Urban Design & Conservation Manager's recommendations.}

#### 5.4.14 Hertfordshire County Council Fire Hydrants

Has suggested that fire hydrants are provided to serve the proposed buildings by the developer through a Section 106 agreement.

### **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) Design, scale and impact on visual amenity
- (c) Impacts on heritage assets
- (d) Quality of residential accommodation
- (e) Affordable housing provision and housing mix
- (f) Impacts on surrounding properties
- (g) Impacts on trees
- (h) Car parking, access and transportation
- (i) Section 106 and Community Infrastructure Levy (CIL)

#### **6.2 (a) Principle of development**

6.2.1 Policy HS1 of the Watford Local Plan Core Strategy 2006-31 advises that factors that will support residential allocation in the site allocations document, and which will also be considered in determining applications on windfall sites, will include: consistency with the spatial strategy; previously developed land; proximity to neighbourhood centres; close to good public transport, walking and cycle network routes; location within the town centre or at other strategically located sites; water quality protection downstream of a site. The Policy further advises that factors that will go against residential allocation will include: not previously developed land; land at risk of flooding; existing employment land, open space or other community facilities for which there is still an identified need; land with high biodiversity, landscape or cultural heritage significance; no access to reliable integrated public transport links.

6.2.2 The proposal complies with the provisions of Policy HS1 in that the site occupies previously developed land which is close to good public transport routes and links, is not open space or a community facility for which there is a need, is not in an area at risk of flooding and does not have high biodiversity, landscape or cultural heritage significance. The site does, however, provide existing employment use through the commercial premises it contains.

- 6.2.3 The planning history for the site shows that it has been occupied by commercial uses for a number of years. Despite this history of commercial use, due to the relatively small size of the site, its restricted access and its location within a residential area, it is not a designated site for employment use.
- 6.2.4 There is no adopted policy contained within the Development Plan which seeks to protect employment uses that are outside designated employment areas. Policy E6 of the Watford District Plan 2000 had previously set out criteria for protecting employment uses outside identified employment areas but this policy has not been saved and is not, therefore, applicable.
- 6.2.5 Policy EMP4 of the emerging Local Plan Part 2 seeks to protect employment space which exists outside of the designated employment areas unless there is evidence to show there is a surplus of B use class employment space or replacement provision is made within Watford, or the property has been vacant for at least 6 months and there is evidence to show it cannot be reused for employment use. The Policy further advises that where a loss of employment space is proposed in an area which is outside of the designated employment areas, such as this, then the development must remain compatible with adjoining uses.
- 6.2.6 The proposal does not appear to directly meet the criteria in the emerging policy and no evidence has been submitted to demonstrate that there is no demand for the existing employment space. Indeed, at the time of the officer site visit, all of the units appeared to be in occupation. Nevertheless, it must be acknowledged that only a limited amount of weight can be afforded to Policy EMP4 of the Local Plan Part 2, at present, as this policy has not been adopted.
- 6.2.7 In the absence of an up-to-date development plan policy in relation to employment uses outside designated employment areas, it is considered that the advice contained within the NPPF should take precedence. Paragraph 22 of the NPPF states that "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose". It further advises that "Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities". In this case, it is apparent that the existing buildings are relatively low grade and some have been added to in a piecemeal fashion. As such, a redevelopment of the site would be required in order for any new employment use to become long-term. The site is relatively small and is located within a high density residential area. It is distant from any other main employment sites and access to the site is via narrow service roads only. For these

reasons, there is little likelihood of the site being redeveloped for commercial use in the future and a commercial redevelopment of the site would not be considered the preferred solution.

6.2.8 Paragraph 51 of the NPPF advises that local planning authorities should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate. In this regard, the Strategic Housing Market Assessment (SHMA) clearly outlines the need for additional housing on a borough-wide scale and there are not considered to be any strong economic reasons why the residential redevelopment of the site would be inappropriate. The proposal, therefore, complies with the objectives of paragraph 51 of the NPPF in this regard.

6.2.9 Furthermore, it is considered that a residential use in this location would be more compatible with the surrounding residential properties when compared to those commercial uses that exist at present. The development would offer a significant improvement to the visual amenity of the area through the removal of the unsightly industrial buildings and the paraphernalia associated with these and the introduction of a new high quality building with green roofs and soft landscaping. In this respect there is a clear benefit in providing a residential use on this site.

6.2.10 Overall, and having regard to the objectives of the NPPF, it is felt that, on balance, the benefits of the proposed redevelopment of this site would outweigh the loss of the existing commercial uses. The loss of the employment use and the provision of housing would provide significant economic, social and environmental benefits in this case.

### 6.3 (b) Design, scale and impact on visual amenity

6.3.1 Policy UD1 of the Watford Local Plan Core Strategy 2006-31 seeks to ensure that all new development is based on an understanding of the local characteristics of the surrounding area.

6.3.2 At a national level, the government's planning guidance places a strong emphasis on the creation of high quality environments through good design. Section 7 of the NPPF states that planning decisions should aim to ensure that developments "will function well and add to the overall quality of the area" and "are visually attractive as a result of good architecture and appropriate landscaping".

- 6.3.3 The area in which the application site is located can be regarded as being mixed in character – being surrounded by varying residential development, the commercial uses fronting Ye Corner and Aldenham Road and the rather piecemeal commercial development that has taken place within the site itself.
- 6.3.4 The proposed development would occupy a fairly secluded position behind the Chalk Hill and Aldenham Road building frontages. The development would have no strong visual presence on the surrounding public realm given that it would be largely screened from view from the surrounding streets by the buildings to the south and east.
- 6.3.5 At present, the site comprises a range of buildings in commercial use and a large expanse of hard surfacing. None of the buildings contained within the site have any historic or architectural significance. There are a number of vehicles parked on site and other unsightly paraphernalia associated with the commercial activities exists. Consequently, a fairly poor level of visual amenity is offered at present. The proposed scheme provides the opportunity for the visual amenity of the site to be considerably improved through a comprehensive redevelopment that will include the introduction of soft landscaping and tree planting.
- 6.3.6 Section 7.1.2 of the RDG advises that “Where positive aspects of local character are more limited, development needs to begin to set a standard for the area by creating a distinctive place in its own right”. In this particular case, the architect has adopted a contemporary design approach that will introduce a new style of architecture to the area to create a development which has the appearance of a modern mews set around a central courtyard. It is felt that the site lends itself to this approach because of its secluded position behind the main building frontages.
- 6.3.7 The submitted elevations show the principal material for the external walls of the building to be brick. The applicant has indicated that timber panelling and metal cladding will be applied to parts of the external elevations. The use of such materials is considered to be acceptable in principle as these could complement the brickwork and add visual interest. The exact type of materials to be used on the external surfaces of the buildings will be secured by condition so as to ensure that a high quality appearance is achieved.
- 6.3.8 The proposed landscaping includes new tree planting. Additionally, green roofs will be incorporated into the development. The new planting and the green roofs will ensure that an attractive environment is created and will provide an enhanced visual amenity for those properties that surround the site.

6.4 (c) Impacts on heritage assets



- 6.4.1 The site is located outside the Oxhey Conservation Area but is located within close proximity to two locally listed buildings; these being 18 Chalk Hill which lies 7 metres to the west of the site, and 48 Aldenham Road which lies 8 metres to the north. A Grade II statutory listed building, known as 14-16 Chalk Hill, is situated 23 metres southwest of the site.
- 6.4.2 It is considered that the setting of the nearby locally listed and statutory listed buildings will not be harmed by the proposed development. Section drawings through the site have been submitted with the application and these illustrate the relationship between the development and the nearest heritage assets – those being the buildings at 18 Chalk Hill and 48 Aldenham Road.
- 6.4.3 The proposed scheme uses the level change along with its flat roof design to minimise its impacts on the locally listed buildings at 18 Chalk Hill and 48 Aldenham Road. It is considered that the greatest impact will be on the setting of 48 Aldenham Road as the new scheme will be viewed as one approaches this property. However, it is considered that the approach to this neighbouring property will be improved when compared to the current situation.
- 6.4.4 The local topography and the presence of trees in the area that lies between the subject site and the listed building at 14-16 and the locally listed building at 18 Chalk Hill mean that the proposed development is unlikely to have any significant impact on the setting of either of these buildings. The submitted drawings indicate that the tree belt (which includes some trees protected by a Tree Preservation Order) will be retained.
- 6.4.5 It is acknowledged that the existing commercial uses that occupy the site do not make a positive contribution to the setting of the nearby heritage assets. The scheme will allow the physical environment within the site and its relationship with its surroundings to be enhanced through the removal of the disorderly commercial development that exists at present and its replacement with a comprehensive form of high quality architecture and landscaping.

6.5 (d) Quality of residential accommodation

*Internal space*

- 6.5.1 The proposal provides a mix of 1 bedroom and 2 bedroom units. All of the proposed 1 bedroom units will exceed the 50 square metre minimum floorspace standard for a 1 bedroom, 2 person dwelling. Additionally, all of the proposed 2 bedroom units will exceed the 61 square metre minimum floorspace standard for a 2 bedroom, 3

person dwelling. The units will benefit from layouts that will allow a typical arrangement of furniture and adequate circulation space. As such, it is considered that a suitable amount of internal space will be provided.

#### *Lighting and outlook*

- 6.5.2 Some of the flats will have a more limited level of amenity than others due to their position within the site and their relationship with the surrounding built form. Nevertheless, it is considered that a reasonable level of outlook will be offered from all of the proposed flats. Additionally, the submitted Daylight Report indicates that all of the units will benefit from daylight levels which are in excess of the Building Research Establishment target values (as set out in the BRE publication entitled 'Site Layout Planning for Daylight and Sunlight; A guide to good practice'). The majority of the flats will benefit from being dual aspect. Those which have only a single aspect will have a southerly orientation. It is felt that all of the proposed units will benefit from reasonable levels of sunlighting particularly given the site's built-up context.

#### *Privacy*

- 6.5.3 Some mutual overlooking is to be expected in a high density development within an urban environment such as this. However, notwithstanding this, the scheme has been carefully designed to minimise any potential overlooking between properties and it is considered that future occupiers of the flats will benefit from suitable levels of privacy.

#### *Amenity space*

- 6.5.4 Section 7.3.23 of the RDG advises that "For flatted developments, communal open space provided for the exclusive use of occupants of the development may be acceptable as long as its location, size and shape enable it to be enjoyed by the occupants". It further advises that "The minimum area for usable communal space is 50 square metres, plus 15 square metres per additional unit over two units". Using this standard, the scheme would be required to have a minimum area of 245 square metres in communal open amenity space. The amount of communal open space to be provided will be below this standard at approximately 200 square metres but three out of the 15 units proposed will have their own private garden areas and seven of the units will have their own private balconies. It is felt that the level of amenity space is acceptable in this context.

#### *Noise*

- 6.5.5 The noise assessment submitted with the application identifies that the site is affected by noise mainly due to traffic on the surrounding roads. The site is also located approximately 100 metres east of the West Coast Mainline railway which also has the potential to result in noise disturbance to future occupiers of the development. In order to ensure that the occupiers of the new flats are protected from noise disturbance certain attenuation measures will need to be implemented including the installation of specified glazing. This can be secured by condition. The Environmental Health Department has also requested that a system for mechanical ventilation be installed, to allow the new flats to be adequately ventilated (both background ventilation and rapid ventilation for cooling and odour removal) without the need for windows to be open in the interests of protecting the future occupants from noise disturbance and potential poor air quality. This can also be secured by condition.

*Refuse and recycling storage facilities*

- 6.5.6 The Council's Waste & Recycling Team has been consulted and has advised that the proposed refuse and recycling storage arrangement is acceptable. The proposed purpose-built stores will be conveniently located in terms of access for future occupiers of the development and refuse collection teams. It is felt that such provision will ensure that adequate refuse and recycling storage will be accommodated without causing harm to the amenities of future occupiers of the development or neighbours and without compromising the appearance of the site, the streetscene or the character of the area, in accordance with saved Policy SE7 of the Watford District Plan 2000 and Policy SD4 of the Watford Local Plan Core Strategy 2006-31.

6.6 (e) Affordable housing provision and housing mix

*Affordable housing*

- 6.6.1 Policy HS3 of the Core Strategy requires a 35% provision of affordable housing in all schemes of 10 units or more. In the case of the proposal, for 15 units, this would require the provision of 5 affordable units. This provision should have a tenure mix of 65% affordable rent, 20% social rent and 15% intermediate tenures. Only in exceptional circumstances will a lower level of provision be considered through submission of a development viability assessment.
- 6.6.2 A viability assessment has been submitted and this has been the subject of a detailed review by consultants BNP Paribas on behalf of the Council. The applicant's submitted assessment concluded that it was not viable for the development to provide any affordable housing, either on-site or in the form of a financial

contribution.

- 6.6.3 Following their initial review of the viability assessment, BNP Paribas felt that the applicant's build costs were significantly in excess of those set out by the Building Cost Information Service (BCIS) levels. As such, BNP Paribas recommended that an independent Quantity Surveyor be instructed to review the applicant's build cost plan. The applicant agreed to this and the outcome of the cost review indicates that the applicant's anticipated build costs are reasonable taking into account the scale of the build and the site-specific circumstances. Accordingly, the Council's consultant agrees that the scheme cannot currently provide any affordable housing. The Council's consultant has recommended that a review of the viability of the development be undertaken towards the end of the project when actual build costs and sales values of the flats are known. This will allow payment to be made towards affordable housing provision where the viability of the development can be shown to have improved to provide a financial surplus. The payment would be capped at £600,916 using the formula for calculating commuted sums as set out in the adopted Commuted Sums Supplementary Planning Document.

#### *Housing mix*

- 6.6.4 Policy HS2 of the Watford Local Plan Core Strategy 2006-31 states that the Council will seek the provision of a mix of housing types, sizes and tenures at local level to meet the requirements of all sectors of the community. The application proposes a combination of one and two bedroom flats, which is considered to be an acceptable housing mix for a sustainable location such as this.

#### 6.7 (f) Impacts on surrounding properties

- 6.7.1 It is considered that the proposed development will cause no significant harm to the amenities of any neighbouring occupiers or uses, in accordance with the provisions of the RDG, Policy SS1 of the Watford Local Plan Core Strategy 2006-31 and paragraph 17 of the NPPF.
- 6.7.2 The development will be visible from many of the surrounding properties but given its size and siting, it is considered that it will not have any overbearing impact on neighbouring properties and will not significantly affect their outlook.
- 6.7.3 The submitted daylight and sunlight assessment demonstrates that the scheme will result in no significant loss of natural light to the nearest residential properties including those that occupy the rear portions of the buildings fronting Aldenham Road and Chalk Hill including units at the rear of numbers 2 and 9 Ye Corner. Adequate levels of natural light and outlook will also be maintained for those units

contained within the buildings on Aldenham Road and Chalk Hill owing to their separation from the new blocks.

- 6.7.4 The proposed development will have an acceptable relationship with the neighbouring properties to the north including 48 Aldenham Road and those within The Larches and will not result in any significant loss of light or outlook to these properties.
- 6.7.5 The proposed buildings will not cause any neighbouring properties to suffer from a significant heightened sense of enclosure or reduced outlook (this is helped somewhat by the fact that the proposed buildings will be sited on lower ground than those nearest properties at 48 Aldenham Road and The Larches).
- 6.7.6 Sections 7.3.16 – 7.3.20 of the RDG outline the privacy standards for new development. The RDG advises that “The separation distance between front elevations will be determined by the street layout and the size of the front gardens”. It further advises that “A minimum separation distance of 27.5 metres should be achieved between rear elevations of new houses and existing houses, when clear glass and directly facing habitable windows are at first floor level”. In this particular case, the development will introduce new residential units in an area where none exist at present. It is apparent that some of the windows and balconies of the new units will be sited less than 27.5 metres from the windows on the nearest residential properties to the south and east of the site. Drawing 106 Rev P3 submitted with the application illustrates, however, that reasonable separation will be provided between the windows contained within the new blocks and those on surrounding properties.
- 6.7.7 While some overlooking between the development and the surrounding properties may take place, this will not be to an extent that will cause any significant harm to the living conditions of neighbouring occupiers. In any case, some mutual overlooking is to be expected in urban environments such as this.
- 6.7.8 The new blocks will feature windows and doors in their northeast-facing elevations. Those at ‘upper ground’ floor level will not offer any significant views into the neighbouring properties at 48 Aldenham Road or within The Larches. These openings will not offer significantly different vantage points to those that can be obtained from the existing windows or from the service road. Similarly, those windows at ‘upper ground’ level on the southeast-facing elevation of Unit 10 will also cause no significant overlooking by virtue of their relationship with the neighbouring properties.
- 6.7.9 The westernmost block within the proposed development will contain two first

floor windows within its northeast-facing elevation. One of these windows will serve a stairwell and this could be fitted with obscure glazing and be fixed shut up to a height of 1.7m above the internal floor level so as to prevent any overlooking towards 48 Aldenham Road. Such measures can be secured by condition. The other window will serve a bedroom (within Unit 15). By reason of its orientation and position, this window will not directly face the property at 48 Aldenham Road or those nearest properties within The Larches and will not, therefore, result in any significant loss of privacy to the occupiers of these neighbouring properties. A distance of more than 27.5m will be maintained between the bedroom window on the northeast-facing elevation of Unit 15 and the nearest neighbouring properties to the north (Nos 12-22 The Larches).

6.7.10 On balance, it is considered that the new development will introduce a residential use which is more compatible with the surrounding residential properties when compared to the existing commercial uses. The new residential development has the potential to result in less disturbance to surrounding properties than current or future industrial uses and their associated activities could cause.

#### 6.8 (g) Impacts on trees

6.8.1 The site does not contain any significant trees. There is a belt of trees to the west of the site which includes a group that is protected by a Tree Preservation Order (Tree Preservation Order No. 33) but none of the protected trees will be affected by the development. Only a small group of trees is indicated for removal, however, these are not significant in the landscape and the new planting will offset their loss.

6.8.2 The Arboricultural Officer has recommended that a detailed schedule of tree works including the cutting back of any off-site trees be submitted and approved by the Local Planning Authority. However, there are no trees to be retained within the site and works to trees which fall outside of the application site could not be controlled by condition as these would be unenforceable.

#### 6.9 (h) Car parking, access and transportation

##### *Car parking*

6.9.1 The proposed flats will be 'car-free' with none of them benefitting from any on-site parking. However, the site is well located for access to public transport, being very close to Bushey Station and bus stops. There are local shops in the immediate vicinity of the site, and the Lower High Street retail area and the town centre are both within walking distance. In this context, a higher density, car-free residential development is in accordance with national and local policy to encourage

sustainable development and is considered acceptable in principle. The lack of on-site parking for the new flats will mean that the proposal will not add to existing high traffic flows and congestion on Aldenham Road and the nearby Bushey Arches gyratory.

- 6.9.2 Two parking spaces are to be provided within the site, located adjacent to Unit 12 (and to the rear of 46 Aldenham Road). The spaces will be accessed via the service road within the northern part of the site which draws off Aldenham Road. The information submitted with the application indicates that these spaces will be allocated to an existing leaseholder. Access into and out of these parking spaces will be fairly restricted given the limited amount of space in front of them (between 3.3 and 5 metres) to allow for manoeuvring. Notwithstanding this, it is apparent that this area is currently used to provide parking for up to three cars and it is felt that the proposal will not result in the situation being worsened in terms of highways impacts. It is further acknowledged that the existing parking area provided in this location measures only 3.9 metres deep at its eastern end (measured between the boundary with the access road and the brick wall that runs along the southern edge of the parking area). Incidentally, the proposed spaces will measure 5 metres deep, thereby allowing cars to be parked at a right angle to the service road without overhanging into the access road.

*Impacts on surrounding highway network*

- 6.9.3 It is acknowledged that the surrounding residential roads experience high levels of parking congestion at all times, from commuters during the daytime and local residents during the evening. However, the site is not within a controlled parking zone so it is not possible to restrict on-street parking by future occupiers of the development. The site is highly accessible and is an appropriate location for car-free development. For this reason, the proposal is considered acceptable.
- 6.9.4 The Local Highway Authority has been consulted and has confirmed that it does not consider that the proposed development is likely to have an impact on the safety of the local highway network. It has raised no objection to the proposal subject to conditions being secured as discussed below.
- 6.9.5 The Local Highway Authority has recommended that conditions be imposed requiring that wheel cleaning facilities be provided for the duration of the construction works and that the applicant submits a Construction Traffic Plan detailing provision for on-site parking for construction workers. Issues arising from construction works are not material planning considerations and are covered by other legislation. As such, it is not considered appropriate to impose planning conditions relating to these matters. Nevertheless, informative notes will added to

the decision notice (see section 9 below) to provide advice to the applicant with regard to wheel washing, contractors' parking and their responsibilities for ensuring that the highway remains unobstructed wherever possible.

- 6.9.6 The Local Highway Authority has also requested a condition requiring the submission of a Service and Delivery Management Plan that shall incorporate the servicing arrangements for the use and adequate provision for the parking and manoeuvring of delivery vehicles within the site. Such detail is considered neither enforceable nor necessary for a scheme of this size, particularly as scaled plans, including turning diagrams, have already been provided as part of the application submission for the Local Highway Authority's consideration at the application stage.

#### *Access*

- 6.9.7 Vehicular access to the site will be gained via the existing entrances on the Chalk Hill and Aldenham Road frontages. There is no facility for service and delivery vehicles (that are larger than small vans) to access the site – as is the case at present.
- 6.9.8 Two loading/unloading bays and a turning area will be provided within the site and these will be accessed utilising the existing entrance on Chalk Hill. Swept path assessments have been provided which demonstrate that there is adequate space within the site to allow cars and small vans to be able to enter, manoeuvre and leave the site in a safe and convenient manner without compromising the safety and freeflow of the adjacent highway.
- 6.9.9 Visibility for vehicles entering and leaving the site is not ideal given the close proximity of the adjoining buildings either side of the access points. However, it has to be taken into account that the access points are existing features that will be retained in their current form. Due to the car free nature of the development and its sustainable location, it is felt that the level of trips generated by the proposed use would be low and the use of the access points would not be significantly intensified. Consequently, it is deemed that the proposal will not have a material impact on the operation of the highway network.
- 6.9.10 The proposal seeks to incorporate two separate bin storage areas. One at the lower ground level to the south of the proposed westernmost block of flats and behind 11 Ye Corner (which would be accessed from the entrance on Chalk Hill) and the other on the upper ground level behind 44 & 46 Aldenham Road (which would be accessed from Aldenham Road). Collections from both bin storage areas would involve the refuse collection vehicles having to wait temporarily on the highway. Whilst this is not an ideal situation, it is apparent that this is what happens at



present and the Local Highway Authority has not objected on these grounds. This arrangement has also been discussed with the Council's Waste and Recycling Team who have agreed to this in principle.

#### *Cycle storage*

- 6.9.11 The scheme incorporates a cycle storage area which will be large enough to meet the demands of the development. Further details of its exact siting, type, size and finish will be secured by condition and this will allow a suitable appearance to be achieved. There is no reason why such storage cannot be designed in a way to ensure that it is both secure and weatherproof in accordance with the requirements of saved Policy T10 of the Watford District Plan 2000.

6.10 (i) Section 106 planning obligations and Community Infrastructure Levy (CIL)

#### *Community Infrastructure Levy (CIL)*

- 6.11 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. The CIL charge applicable to the proposed development is £120m<sup>2</sup>.

#### *S.106 planning obligation*

- 6.12 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.
- 6.13 A s.106 agreement will be used to secure a review mechanism to revisit actual build costs and values when the development is approaching completion to establish if a contribution towards affordable housing provision can be made (as set out in paragraph 6.6.3). This requirement meets the tests in Regulation 122 of the Community Infrastructure Regulations 2010, and, consequently, this planning obligation can be taken into account as material planning consideration in the determination of the application.

## **7.0 Conclusion**

- 7.1 This is a challenging site to bring forward for redevelopment due to the constraints from the surrounding uses, the change in levels, the nearby heritage assets and the limited access arrangements. However, the careful design and layout innovatively responds to the constraints of the site and the contemporary mews style approach is to be welcomed as this will create a high quality environment that offers a suitable relationship with its surroundings.
- 7.2 A car free development is considered to be suitable taking into account the site's sustainable location. The proposed residential flats will provide a good overall quality of accommodation for future residents without causing any considerable harm to neighbouring uses or occupiers, subject to appropriate conditions.
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## **8.0 Human Rights implications**

- 8.1 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.
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## **9.0 Recommendation**

- 9.1 That, pursuant to a planning obligation under s.106 of the Town and Country Planning Act 1990 having been completed to secure the following Heads of Terms, planning permission be granted subject to the conditions listed below:

### Section 106 Heads of Terms

- i) To secure a review mechanism of the viability of the scheme for a contribution up to a maximum total contribution of £600,916 towards the provision of affordable housing in the Borough of Watford, subject to the review demonstrating the improved viability of the development.

### Conditions

#### Time Limit

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.

### Approved Drawings

2. The development hereby permitted shall be carried out in accordance with the following approved drawings: 16668-Topo Rev A – amended plan received 26.07.17; 16668-MBS; 000 Rev P3 – amended plan received 12.10.17; 102 Rev P6 – amended plan received 17.10.17; 105 Rev P6 – amended plan received 17.10.17; 106 Rev P3 – amended plan received 26.07.17; 107 Rev P3 – amended plan received 17.10.17; 108 Rev P3 – amended plan received 17.10.17; 110 Rev P3 – amended plan received 12.10.17; 111 Rev P3 – amended plan received 17.10.17; 112 Rev P4 – amended plan received 12.10.17; 113 Rev S1; 200 Rev P4 – amended plan received 17.10.17; 201 Rev P2 – amended plan received 17.10.17; 300 Rev P3 – amended plan received 12.10.17; 301 Rev P3 – amended plan received 26.07.17; 302 Rev P3 – amended plan received 26.07.17; 303 Rev P2 – amended plan received 26.07.17; 600 Rev P2 – amended plan received 24.10.17; 601 Rev P2 – amended plan received 24.10.17; 1237-001 Rev A – amended plan received 04.08.17; 1237-002 Rev A – amended plan received 04.08.17; 1237-003; 1237-004.

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

### External Materials and Finishes

3. Notwithstanding the information already submitted, no construction works above damp proof course level shall commence until details of the materials to be used for all the external finishes of the buildings, including all walls, roofs, doors, windows, balconies, rainwater and foul drainage goods (including samples where considered necessary by the Local Planning Authority) and details of the reveal treatment to be applied around windows and doors 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 details.

Reason: In the interests of the visual appearance of the site and the character and appearance of the area, in accordance with the provisions of the Residential Design Guide (RDG), Policy UD1 of the Watford Local Plan

Core Strategy 2006-31 and Section 7 of the National Planning Policy Framework (NPPF).

External Lighting

4. No dwelling shall be occupied until a scheme detailing the external lighting to be installed within the site (including free standing light fixtures and any external lighting attached to buildings) has been submitted to and approved in writing by the Local Planning Authority. All external lighting shall be installed prior to the first occupation of the development in accordance with the specifications and locations set out in the scheme, and shall be maintained thereafter in accordance with the approved scheme. Under no circumstances should any other external lighting be installed without the prior written approval of the Local Planning Authority.

Reason: To ensure that any external lighting safeguards the security and amenities of residents and respects the character and appearance of the area in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

Surface Water Management

5. The development permitted by this planning permission shall be carried out in accordance with the approved Surface Water Drainage Strategy prepared by Ambiental Technical Solutions – Reference 3136 SWDS, Version Draft v4.0 (dated April 2017) and the following mitigation measures detailed within the drainage strategy:
  - i). Providing attenuation to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + climate change event;
  - ii). Implementing appropriate drainage strategy based on attenuation and discharge into Thames surface water sewer including SuDS features as indicated on drawing No. Lower Level, Revision 2 – Preliminary Surface Water Drainage Strategy Layout, dated 05/07/2017 and drawing No. Upper Level, Revision 2 – Preliminary Surface Water Drainage Layout, dated 05/07/2017;
  - iii). Limiting surface water discharge off the site at a maximum allowable rate of 5.0 l/s/ha for the 1 in 100 year plus 40% for climate change event;

- iv). Clarification and indication in the drawing where exactly the filter drain connects with the existing infrastructure;
- v). Incorporation of the upper parking site in the system and provision of updated calculation considering this area;
- vi). Final detailed scheme with updated calculation including all site area.

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 reduce the risk of flooding by ensuring the satisfactory disposal and storage of surface water from the site, in accordance with saved Policy SE27 of the Watford District Plan 2000, Policies SD1 and SD2 of the Watford Local Plan Core Strategy 2006-31 and Section 10 of the National Planning Policy Framework (NPPF).

- 6. No development shall take place until the final design of the drainage scheme for the site, based on the approved Surface Water Drainage Strategy, has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

The scheme shall also include:

- i). Provision of a fully detailed drainage plan showing pipe diameters, pipe runs, outlet points and location of SuDS features and supporting calculations;
- ii). Detailed engineered drawings of the proposed SuDS features including their, size, volume, depth and any inlet and outlet features including any connecting pipe runs and all corresponding calculations/modelling;
- iii). Final detailed management plan to include arrangements for adoption and any other arrangements to secure the operation of the scheme throughout its lifetime.

Reason: To reduce the risk of flooding by ensuring the satisfactory disposal and storage of surface water from the site, in accordance with saved Policy

SE27 of the Watford District Plan 2000, Policies SD1 and SD2 of the Watford Local Plan Core Strategy 2006-31 and Section 10 of the National Planning Policy Framework (NPPF).

#### Refuse, Recycling and Cycle Storage

7. Notwithstanding the information already submitted, no dwelling shall be occupied until details of the siting, type, size and finish of the refuse, recycling and cycle storage enclosures have been submitted to and approved in writing by the Local Planning Authority. No dwelling shall be occupied until the approved refuse, recycling and cycle storage enclosures have been constructed and made available for use. These facilities shall be retained as approved at all times thereafter.

Reason: To ensure that adequate facilities exist for residents of the proposed development and in the interests of visual amenity, in accordance with saved Policies SE7 and T10 of the Watford District Plan 2000 and Policies SD4 and UD1 of the Watford Local Plan Core Strategy 2006-31.

#### Soft Landscaping

8. No dwelling shall be occupied until a detailed soft landscaping scheme for all the land within the site has been submitted to and approved in writing by the Local Planning Authority. This shall include details of new tree and shrub planting including their location, species, size (container size where applicable) and planting density. The approved landscaping scheme shall be carried out not later than the first available planting and seeding season after completion of development. Any trees or plants whether new or existing 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: In the interests of the amenities of residents and the visual appearance of the site and the wider area, in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

#### Hard Landscaping

9. No dwelling shall be occupied until a detailed hard landscaping scheme for all the land within the site has been submitted to and approved in writing by

the Local Planning Authority, and the works have been carried out in accordance with the approved details.

Reason: In the interests of the amenities of residents and the visual appearance of the site and the wider area, in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

#### Extent of Hard Surfacing

10. No hard surfacing, other than that approved under Condition 9, shall be laid/installed within the site.

Reason: To prevent additional car parking taking place within the site which would have the potential to cause harm to the amenities of residents and in the interests of visual amenity, pursuant to saved Policy T21 of the Watford District Plan 2000 and Policies SS1 and UD1 of the Watford Local Plan Core Strategy 2006-31.

#### Amenity Space

11. No dwelling shall be occupied until the proposed private amenity areas, communal amenity space and soft landscaped areas have been laid out as shown on the approved drawings. These areas shall be retained as such at all times thereafter and shall not be used for car parking, manoeuvring or for any other purpose.

Reason: To ensure that unsatisfactory parking on-site does not occur and in the interests of the visual appearance of the site in accordance with saved Policy T21 of the Watford District Plan 2000 and Policies SS1 and UD1 of the Watford Local Plan Core Strategy 2006-31.

#### Means of Enclosure

12. Notwithstanding the information already submitted, no dwelling shall be occupied until details of the siting, height, type, materials and finish of all fencing, walls, gates or other means of enclosure around the boundaries of the site and within the site have been submitted to and approved in writing by the Local Planning Authority. All fencing, walls, gates or other means of enclosure shall be provided in accordance with the approved details prior to the first occupation of any part of the development and shall be maintained as such at all times thereafter. Notwithstanding the provisions of Class A of Part 2, Schedule 2 of the Town and Country Planning (General Permitted

Development) Order 2015 (as amended) no gates, walls or means of enclosure, other than those approved under this condition, shall be erected or installed on the site without the prior written approval of the Local Planning Authority.

Reason: In the interests of visual amenity, to ensure that suitable levels of privacy are provided for future occupiers of the development and neighbours, and to minimise danger, obstruction and inconvenience to users of the adjacent highway, in accordance with the provisions of the Residential Design Guide (RDG), saved Policies T21 and T24 of the Watford District Plan 2000 and Policies SS1 and UD1 of the Watford Local Plan Core Strategy 2006-31.

#### Parking, driveway and manoeuvring layout

13. No dwelling shall be occupied until the on-site loading/unloading bays and manoeuvring area have been laid out and constructed in accordance with the approved drawings (and those details approved under conditions 5, 6 and 9) and made available for use. These facilities shall be retained as approved at all times.

Reason: To ensure that adequate facilities are provided for the occupants of the development and to minimise disruption to the surrounding highway network in accordance with saved Policies T21 and T24 of the Watford District Plan 2000.

#### Levels

14. Notwithstanding the information already submitted, no construction of the approved buildings shall commence until detailed plans showing the existing and new or altered ground levels within the site and the floor levels of all the proposed buildings have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out only in accordance with the details approved under this condition.

Reason: To ensure that the proposed buildings and any other changes in level on the site maintain a satisfactory relationship between the development and existing properties so as to safeguard the character and appearance of the area and the privacy and amenities of neighbouring properties in accordance with the objectives of Policies UD1 and SS1 of the Watford Local Plan Core Strategy 2006-31 and paragraph 17 of the National Planning Policy Framework (NPPF).



### Obscure glazing

15. The proposed first floor window in the northeast-facing elevation of the westernmost building (serving the stairwell – as detailed on drawing number 112 Rev P4 – amended plan received 12.10.17) shall be permanently fixed closed below 1.7m internal floor level and shall be fitted with obscured glass at all times unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that suitable levels of privacy are achieved for the occupiers of the neighbouring property to the north pursuant to the provisions of the Residential Design Guide (RDG) and paragraph 17 of the National Planning Policy Framework (NPPF).

### No use of flat roofs

16. No parts of the flat roofs of the development shall be used as terraces, balconies or other open amenity spaces.

Reason: To ensure that suitable levels of privacy are achieved for the occupiers of the neighbouring properties pursuant to the provisions of the Residential Design Guide (RDG) and paragraph 17 of the National Planning Policy Framework (NPPF).

### Tree Protection Measures

17. Details of a 'no-dig' method of construction for the proposed bin store and other works within the root protection zone of the group of trees referred to as Group "G1" within the submitted Arboricultural Statement, prepared by RJ Tree Services Ltd (Ref. ARBORSURVEY01\_Ye Corner dated 06.02.17), and as detailed on the accompanying Arboricultural Survey & Constraints Plan 01, shall be submitted to and approved in writing by the Local Planning Authority before any excavations are carried out in this root protection zone. The development shall only be carried out in accordance with the details approved under this condition.

Reason: To ensure that the neighbouring trees which make a positive contribution to the visual amenity of the area are protected during construction works, in accordance with saved Policies SE37 and SE39 of the Watford District Plan 2000 and Policies UD1 and GI3 of the Watford Local Plan Core Strategy 2006-31.

18. No works associated with the development shall be carried out to existing trees within and/or surrounding the site until a detailed schedule of such works has been submitted to and approved in writing by the Local Planning Authority. The tree works shall only be carried out in accordance with the approved details.

Reason: To ensure that the neighbouring trees which make a positive contribution to the visual amenity of the area are protected during construction works, in accordance with saved Policies SE37 and SE39 of the Watford District Plan 2000 and Policies UD1 and GI3 of the Watford Local Plan Core Strategy 2006-31.

#### Satellite Dishes and Aerials

19. No dwelling shall be occupied until details of a communal terrestrial television aerial(s) and satellite dish(es) have been submitted to and approved in writing by the Local Planning Authority. No aerials or satellite dishes, other than those approved by this condition, shall be installed within the site.

Reason: To prevent visual cluttering and to ensure that a high quality environment is achieved, in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

#### Fire Hydrants

20. No dwelling shall be occupied until a detailed scheme showing the provision of fire hydrants serving the development (as incorporated into the provision of the mains water services for the development whether by means of existing water services or new mains or extension to or diversion of existing services or apparatus) has been submitted to and approved in writing by the Local Planning Authority. The approved fire hydrant provision shall be installed and made available for use prior to the first occupation of any dwelling forming part of the development and shall be maintained as such thereafter.

Reason: To ensure that suitable fire-fighting facilities are provided.

#### Noise and Air Quality Mitigation Measures

21. No construction works above damp proof course level shall commence until a noise mitigation scheme for each of the residential dwellings, based upon the recommendations of the Noise Assessment prepared by MoirHands (Report No. 3249/25/17) dated 24<sup>th</sup> March 2017, has been submitted to and approved by the Local Planning Authority. The scheme shall include the details and specifications of the sound reduction performance of all glazed and non-glazed elements of the building facades and the performance of acoustic trickle vents for all bedroom windows. An updated noise assessment shall be submitted to demonstrate that the proposed measures achieve the required internal noise levels. No dwelling shall be occupied until the approved mitigation measures have been installed in full, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that suitable living conditions are provided for future occupiers of the development in accordance with BS 8233:2014 and the aims of saved Policy SE22 of the Watford District Plan 2000 and Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

22. No construction works above damp proof course level shall commence until the specification of a mechanical air supply/extract system for each of the residential dwellings has been submitted to and approved in writing by the Local Planning Authority. The system must be capable of providing background and rapid ventilation for cooling with the windows of the respective dwelling remaining closed. The system must not compromise the sound insulation of the façades. Details of the siting of any air intake; extraction units; generators and other mechanical equipment serving this system that are likely to give rise to noise should be submitted, along with details of noise attenuation measures to be incorporated to ensure these units do not give rise to a noise nuisance. Noise from the external plant associated with this system, when combined with any building services plant, must not exceed limit of 39dB(A) during the daytime and 27dB(a) night time, one metre from the nearest residential façades. In addition, when in operation, the sound pressure level within each flat shall not exceed the internal noise levels contained in BS8233:2014 1 metre from any associated inlet or outlet. No dwelling shall be occupied until the approved ventilation system has been installed in full, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure good indoor ambient noise levels are achieved in accordance with BS 8233:2014 and the aims of saved Policy SE22 of the Watford District Plan 2000 and Policy UD1 of the Watford Local Plan Core Strategy 2006-31 and to ensure that an acceptable level of air quality is

achieved for future occupiers of the units in accordance with EU and national air quality limit values and in accordance with saved Policy SE22 of the Watford District Plan 2000.

23. No construction works above damp proof course level shall commence until a specification for the building services plant, to operate in combination to a noise emission limit of 39dB(A) during the daytime and 27dB(a) night time, one metre from the nearest residential façades, has been submitted to and approved in writing by the Local Planning Authority. Any building services plant must not compromise the sound insulation of the façades. The applicant shall submit details of the building services plant, up to date plans and an updated Noise Assessment demonstrating that these noise emissions limits are met by the proposed plant.

Reason: To ensure good indoor ambient noise levels are achieved for the occupiers of adjoining dwellings in accordance with BS 8233:2014 and saved Policy SE22 of the Watford District Plan 2000.

#### Contamination

24. Notwithstanding the information already submitted, no development shall commence until a remediation strategy to deal with the risks associated with contamination of the site has been submitted to and approved in writing by the Local Planning Authority. This strategy shall include the following components:
- i). A preliminary risk assessment which has identified:
    - all previous uses;
    - potential contaminants associated with those uses;
    - a conceptual model of the site indicating sources, pathways and receptors; and
    - potentially unacceptable risks arising from contamination at the site.
  - ii). A site investigation scheme, based on (i) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
  - iii). The results of the site investigation and the detailed risk assessment referred to in (ii) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

- iv). A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (iii) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

No changes to these components shall be undertaken without the written approval of the Local Planning Authority. All works shall be carried out in accordance with the approved details.

Reason: This is a pre-commencement condition to ensure any contamination of the ground is identified and remediated in the interests of the health of the future occupiers of the site, in accordance with saved Policy SE24 of the Watford District Plan 2000.

- 25. No construction works shall commence until a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation has been submitted to, and approved in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason: This is a pre-commencement condition to verify that all contamination has been successfully removed from site following all remediation works in the interests of the health of the future occupiers of the site, in accordance with saved Policy SE24 of the Watford District Plan 2000.

- 26. No development shall take place until a long-term monitoring and maintenance plan in respect of contamination, including a timetable of monitoring and submission of reports to the Local Planning Authority, has been submitted to, and approved in writing by, the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the Local Planning Authority.

Reason: To protect groundwater through ensuring that the site does not pose any further risk to human health or the water environment by managing any ongoing contamination issues and completing all necessary long-term remediation measures. This is in line with saved Policy SE24 of the

Watford District Plan 2000 and paragraph 109 of the National Planning Policy Framework (NPPF).

27. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason: In the interests of the health of the future occupiers of the site, in accordance with saved Policy SE24 of the Watford District Plan 2000.

28. No infiltration of surface water drainage into the ground is permitted other than with the prior written consent of the Local Planning Authority. The development shall be carried out only in accordance with the approved details.

Reason: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants, in accordance with saved Policy SE24 of the Watford District Plan 2000 and paragraph 109 of the National Planning Policy Framework (NPPF).

29. No piling, deep foundations, investigation boreholes or other deep intrusive groundworks using penetrative methods shall be carried out until a method statement (detailing the depth and type of piling, boreholes, foundations or other groundworks to be undertaken and the methodology by which such works will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, measures to prevent harm to groundwater resources and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out only in accordance with the approved details.

Reason: To safeguard underground sewerage utility infrastructure and to ensure that the proposed foundation works do not harm groundwater resources in accordance with saved Policy SE28 of the Watford District Plan 2000, Policy SD1 of the Watford Local Plan Core Strategy 2006-31 and Section 11 of the National Planning Policy Framework (NPPF).

30. Prior to any part of the development hereby approved being brought into use, a scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected and inspected. The development shall be carried out only in accordance with the approved details.

Reason: To ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution or loss of water supplies in line with paragraph 109 of the National Planning Policy Framework (NPPF).

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 2015. The Council entered into pre-application discussions with the applicant and requested amendments during the consideration of the application.
2. You are advised of the need to comply with the provisions of The Control of Pollution Act 1974, The Health & Safety at Work Act 1974, The Clean Air Act 1993 and The Environmental Protection Act 1990.

In order to minimise impact of noise, any works associated with the development which are audible at the site boundary should be restricted to the following hours:

- Monday to Friday 8am to 6pm
- Saturdays 8am to 1pm
- Noisy work is prohibited on Sundays and bank holidays

Instructions should be given to ensure that vehicles and plant entering and leaving the site comply with the stated hours of work.

Further details for both the applicant and those potentially affected by construction noise can be found on the Council's website at:

[https://www.watford.gov.uk/info/20010/your\\_environment/188/neighbour\\_complaints\\_%E2%80%93\\_construction\\_noise](https://www.watford.gov.uk/info/20010/your_environment/188/neighbour_complaints_%E2%80%93_construction_noise).

3. All new developments granted planning permission and to be constructed require naming or numbering under the Public Health Act 1925. You must contact Watford Borough Council Street Naming and Numbering department as early as possible prior to commencement on [streetnamenumbers@watford.gov.uk](mailto:streetnamenumbers@watford.gov.uk) or 01923 278458. A numbering notification will be issued by the council, following which Royal Mail will assign a postcode which will make up the official address. It is also the responsibility of the developer to inform Street Naming and Numbering when properties are ready for occupancy.
4. The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence. Further information is available via the website <http://www.hertsdirect.org/services/transtreets/highways/> or by telephoning 0300 1234047.
5. It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence. Further information is available via the website <http://www.hertsdirect.org/services/transtreets/highways/> or by telephoning 0300 1234047.
6. It is an offence under section 148 of the Highways Act 1980 to deposit mud or other debris on the public highway, and section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure that all vehicles leaving the site during construction of the development are in a condition such as not to emit dust or deposit mud, slurry or other debris on the highway. Further information is available via the website <http://www.hertsdirect.org/services/transtreets/highways/> or by telephoning 0300 1234047.



7. You are advised that appropriate arrangement should be made within the site to provide for:
  - a.) Servicing and Delivery associated with the construction
  - b.) Parking for workers and contractors associated with the construction
  - c.) Wheel washing to prevent the spread of debris onto the public highway.

Failure to make such provisions may be contrary to the Highways Act and/or require a separate licence from the Local Highway Authority.

8. With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.
9. 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. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921.
10. There are public sewers crossing or close to the area in which the development is proposed. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted for extension to existing buildings. The applicant is advised to visit [thameswater.co.uk/buildover](http://thameswater.co.uk/buildover) for further details.
11. This development may be considered a chargeable development for the purposes of the Community Infrastructure Regulations 2010 (as amended). The charge is non-negotiable and is calculated at the time planning

permission is granted. The charge is based on the net increase of gross internal floor area of the proposed development.

A person or party must assume liability to pay the levy using the assumption of liability form 1 which should be sent to the CIL Officer, Regeneration and Development, Watford Borough Council, Town Hall, Watford, WD17 3EX or via email (semeta.bloomfield@watford.gov.uk).

If nobody assumes liability to pay the levy this will default to the land owner. A Liability Notice will be issued in due course. Failure to adhere to the Regulations and commencing work without notifying the Council could forfeit any rights you have to appeal or pay in instalments and may also incur fines/surcharges.

12. Information for developers and guidance documents in relation to land contamination can be found online at:  
[https://www.watford.gov.uk/info/20011/business\\_and\\_licensing/349/contaminated\\_land](https://www.watford.gov.uk/info/20011/business_and_licensing/349/contaminated_land) and the contaminated land pages on gov.uk.
13. This planning permission is accompanied by a legal agreement under Section 106 of the Town and Country Planning Act 1990 to secure a review mechanism of the viability of the scheme for a contribution towards the provision of affordable housing in the Borough of Watford, subject to the review demonstrating the improved viability of the development.

### Drawing numbers

16668-Topo Rev A – amended plan received 26.07.17

16668-MBS

000 Rev P3 – amended plan received 12.10.17

102 Rev P6 – amended plan received 17.10.17

105 Rev P6 – amended plan received 17.10.17

106 Rev P3 – amended plan received 26.07.17

107 Rev P3 – amended plan received 17.10.17

108 Rev P3 – amended plan received 17.10.17

110 Rev P3 – amended plan received 12.10.17

111 Rev P3 – amended plan received 17.10.17

112 Rev P4 – amended plan received 12.10.17

113 Rev S1

200 Rev P4 – amended plan received 17.10.17

201 Rev P2 – amended plan received 17.10.17

300 Rev P3 – amended plan received 12.10.17

301 Rev P3 – amended plan received 26.07.17

302 Rev P3 – amended plan received 26.07.17  
303 Rev P2 – amended plan received 26.07.17  
600 Rev P2 – amended plan received 24.10.17  
601 Rev P2 – amended plan received 24.10.17  
1237-001 Rev A – amended plan received 04.08.17  
1237-002 Rev A – amended plan received 04.08.17  
1237-003  
1237-004

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