

PART A	
Report of: Head of Development Management	
Date of committee:	28th February 2018
Site address:	75-81 The Parade, High Street
Reference Number:	17/00459/FULM
Description of Development:	Demolition of existing buildings and redevelopment of site to provide new building comprising 4 storeys above ground level and two floors below ground level to create a 55 bedroom hotel with associated facilities.
Applicant:	Mr Hamdullah Erpolat
Date Received:	8th September 2017
13 week date (major):	8th December 2017
Ward:	Central

1.0 Site and surroundings

- 1.1 The application site comprises three commercial premises contained within a part single and part two storey parade that fronts the High Street. These premises consist of a newsagent occupying the ground floor unit at 75 The Parade, a charity shop occupying the ground floor unit at No. 81 and a restaurant which occupies the remaining part of the site including the ground floor area of No.s 77-79 and the entire first floor level above No.s 75 - 81.
- 1.2 The site is situated on the northeastern side of the The Parade section of the High Street. It is located within the Town Centre Special Policy Area and also the Town Centre Primary Shopping Area, as detailed within Figure 6 (page 54) of the Watford Local Plan Core Strategy 2006-31. The ground floor level of the building forms part of the designated Secondary Retail Frontage as detailed on the Watford District Plan 2000 Proposals Map.
- 1.3 A road known as Gaumont Approach runs behind the site. This acts as a service road for vehicles accessing the Sainsburys supermarket (located to the northeast of the site) and also the rear of those commercial premises which are located along the northeastern side of the Parade.
- 1.4 The site lies within the Civic Core Conservation Area. There are no listed buildings

encompassed within the site. There are, however, a number of locally listed buildings and a statutory listed building within close proximity to the site. These include the Grade II listed Monmouth House at 85-95 The Parade and the locally listed building at 58-68 The Parade.

2.0 Proposed development

- 2.1 Full planning permission is sought for the redevelopment of the site to provide a 55 bedroom hotel. The scheme will involve the demolition of the existing buildings with the new hotel building comprising 4 storeys above ground level and two floors below ground level.
- 2.2 The submitted plans indicate that the new building will feature a lobby and reception area, restaurant and café with associated kitchen facility at ground floor level.
- 2.3 The 55 guest rooms will be accommodated on the first, second and third floor levels.
- 2.4 Within the two level basement, it is proposed that one of these (-1 level) will provide car parking and cycle storage with the additional basement level (-2 level) accommodating a swimming pool, gym and spa facilities.
- 2.5 A stairwell and lift core will occupy a central position on every floor level of the building.
- 2.6 Vehicular access into the site will be gained via Gaumont Approach. A ramped access will be accommodated within the southeastern side of the building and this will allow cars to enter and leave the basement car parking area. A covered service bay will also be accommodated at the rear of the premises at ground floor level to provide valet parking and a taxi pick-up/drop-off area.

3.0 Relevant planning history

- 3.1 There are a significant amount of historical planning records relating to the premises contained within the site. These include records of applications relating to their commercial uses, new shopfront alterations, extensions and new signage. Not all of the planning history has been listed in this report. However, the most recent and relevant planning history is outlined below.
- 3.2 Ref. 14/01655/FUL – Erection of a 2 storey rear extension – Refused Planning Permission in May 2015 for the following reasons:

1. *The proposal has the potential to result in an increase in anti-social behaviour, crime and disorder within the town centre, contrary to the objectives of saved Policy S11 of the Watford District Plan 2000, Policies SPA1 and TLC1 of the Watford Local Plan Core Strategy 2006-31 and paragraph 58 of the National Planning Policy Framework (NPPF) which seek to ensure that development contributes towards the creation of a family friendly environment and has no adverse effect on community safety.*
 2. *The application fails to demonstrate that adequate refuse and recycling storage, which would meet the demands of the premises contained within the site, can be suitably accommodated on site without compromising the visual amenity of the area and without overspilling onto the adjacent highway. The failure to provide suitable waste storage contravenes the provisions of Policy SE7 of the Watford District Plan 2000 and Policy SD4 of the Watford Local Plan Core Strategy 2006-31.*
- 3.3 Ref. 15/01090/FUL – Change of use from nightclub to cafe/restaurant (A3 Use) and erection of double storey rear extension – Conditional Planning Permission granted in December 2015.
- 3.4 Ref. 16/00150/PREAPP – Pre-application enquiry for the redevelopment of the site to provide a new hotel and ancillary facilities – The Local Planning Authority (LPA) responded to this enquiry in April 2016 following a review by the Major Applications Review Forum (MARF). Within its response, the LPA concluded that the principle of providing a 4 star or boutique hotel is acceptable within a town centre location such as this. However, the LPA expressed concerns with the design and form of the proposed building as it was felt that this would fail to enhance the streetscene or the wider visual amenity of the area. The LPA advised that the proposed development would dominate the setting of the nearby listed building and would have a detrimental impact on the character and appearance of the Civic Core Conservation Area. In addition, the LPA raised concerns that the proposal fails to demonstrate that suitable refuse, recycling, cycle storage and servicing arrangements could be achieved without causing further harm to the visual amenity of the site and its surroundings or the amenities of neighbouring occupiers. Furthermore, it was felt that the scheme failed to demonstrate that adequate noise mitigation measures could be achieved to ensure that the amenities of guests and neighbours would be safeguarded. Given the concerns raised with the scheme, the applicant was advised that an application for a scheme of this nature would not be viewed favourably.

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 Supplementary Planning Documents

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

Watford Residential Design Guide

Watford Character of Area Study

Civic Core Conservation Area Character Appraisal

Locally Listed Buildings in Watford

4.3 National Planning Policy Framework

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

Achieving sustainable development

The presumption in favour of sustainable development

Core planning principles

Section 1 Building a strong, competitive economy

Section 2 Ensuring the vitality of town centres

Section 4 Promoting sustainable transport

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

5.0 Consultations

5.1 Neighbour consultations

5.2 Letters were sent to 48 properties surrounding the site.

5.3 One response in support of the application was received citing the following comments:

- If it is of suitable quality, it is in our opinion an appropriate addition to the variety of commercial activities in the Entertainment District in The Parade. It will enhance the look and appeal of the area, bring commercial benefits to Watford Town Centre and to existing local businesses, and produce additional employment for the area.

5.4 One response was received neither supporting nor objecting to the proposal but cited the following observations:

- I was interested to see that the applicant thinks that there is room in Watford for yet another hotel, albeit on a more modest scale than those recently approved.
- One cannot argue with the reason given on the application form for demolishing these buildings and by leaving No. 83 they simplify the problem of building next to Monmouth House.
- Front gables seem popular at the moment but I suppose here they are supposed to mirror those on Monmouth House: your Urban Design & Conservation Manager will be considering their suitability in this Conservation Area.
- There may also be the problem of the loss of still more retail on The Parade.

[Officer comment: The matters raised in the representations above are covered within the Appraisal section (Section 6) of the report below.]

5.5 The Watford Business Improvement District (BID) has submitted a representation. Their comments are set out in the table below:

Observations	Officer comments
Watford BID supports, in principle, the idea of a well-designed, good quality hotel which sits comfortably and adds to the existing architecture and offer of the town.	<p>The principle of a hotel use in this location is discussed in Section 6 under the heading of 'Principle of use'.</p> <p>The quality of the accommodation and facilities are discussed within Section 6</p>

	<p>under the heading of 'Quality of accommodation and facilities'.</p> <p>The design and architecture are discussed in Section 6 under the heading of 'Scale and design'.</p>
<p>Watford BID is concerned about the quality of design of the submission and the appropriateness of the materials proposed. It is considered the materials do not fit in with the local environment and could be viewed as being rather industrial.</p>	<p>Design and materials are discussed in Section 6 under the heading of 'Scale and design'.</p>
<p>The current proposed room configuration is for 2 single and 53 doubles. However, there is flexibility within the room sizes to allow for twins or include family rooms. We therefore question who are the proposed target market? This is an important as it will determine the impact on the town, the night-time economy and subsequent anti-social behaviour. If the hotel market is not clearly defined or the hotel well-designed it will receive negative comments and reviews, these will be placed within the public domain and reflect badly on the establishment and subsequently on the town and its reputation.</p>	<p>The layout is discussed in Section 6 under the heading of 'Quality of accommodation and facilities'.</p>
<p>Concern was raised about the lack of natural light available in a number of rooms – this will have a significant impact on the price that can be charged. Guidelines regarding natural light are set out by the AA, the design fails to meet the most basic of standards within the guidelines.</p>	<p>Natural lighting is discussed in Section 6 under the heading of 'Quality of accommodation and facilities'.</p>
<p>We feel a Business Plan is required to support the application with evidence that the applicant understands the hospitality sector and managing guest accommodation.</p>	<p>This is not a material planning consideration.</p>
<p>The BID is concerned about the layout, design, size and configuration of the rooms within the current design. The room composition will be determined by</p>	<p>The layout and quality of the accommodation proposed are discussed in Section 6 under the heading of 'Quality of accommodation and facilities'.</p>

understanding the target audience and the rating/standard of the establishment, all are key to understanding what the hotel will add to the town and its offer.	
A primary concern for hotels is customer safety – safe access and entry points for both guests and emergency services if required – this also impacts on the businesses ability to insure the property and business. There are some quite stringent criteria to meet in respect of hotel insurance. The current design has a single staircase with 2 lifts in the centre of the property. If a fire was to break out in the centre of the building where would the exit point be for guests and the access point for the emergency services?	<p>The proposal would need to satisfy Building Regulations which seek to ensure that suitable fire protection/safety measures are secured.</p> <p>With regard to insurance, this is not a material planning consideration.</p>
The BID has concerns around the potential for anti-social behaviour – but again this would depend on the target audience and management of the hotel and associated leisure facilities.	<p>Hertfordshire Constabulary Crime Prevention Design Service (CPDS) has been consulted and has also raised concerns regarding the potential for anti-social behaviour. Crime prevention will be influenced by how the hotel is managed. The CPDS does not object to the proposal subject to certain measures being implemented (see their comments below). Anti-social behaviour and crime prevention is discussed in Section 6 of the report.</p>

5.6 **Statutory publicity**

The application was publicised by site notices and a notice published in the Watford Observer. The site notice period and the newspaper notice period expired on 18th October 2017 and 27th October 2017 respectively.

5.7 **Technical consultations**

The following responses have been received from technical consultees:

5.8 Urban Design & Conservation Manager

The comments of the Urban Design & Conservation Manager are outlined below:

The principle of the proposed hotel use in the town centre is not opposed and would fit in with the range of uses in the town centre. This leaves the discussion as one around the design of the building and the relationship of the proposed building to the surrounding area.

The conservation area and Monmouth House are both designated assets and are considered to have greater value than the non-designated locally listed buildings in the area.

Listed Building:

Monmouth House is statutorily listed at Grade II see full description below. No changes are proposed to the fabric of the listed building but its setting will be affected. The significance of this asset lies in:

- Its evidential value connecting the present day back to the town in the 17th century; part of the C17th remains internally and externally. Part was rebuilt in 1927. This value is strong.
- Historical value: the house was built for a high status occupant, the Earl of Monmouth and had substantial grounds which no longer remain. It illustrates the way society was structured at this time and has illustrative historical value; there is some associative historical value as well as the first owner was the Earl of Monmouth who was a significant figure in the early C17th.
- Aesthetic value: the house has strong aesthetic value; the house was designed and built to a particular design; it was split into two sections and part was refaced in the early 1800s; this part was later remodelled to replicate the southern part which has not been altered.

The setting of the building has been compromised and the grounds in which it once stood lost. However, the building does have a strong presence in the local street scene and this should be retained going forwards. The strong gable form of the listed building and the use of a distinctive brick create a significant sense of place which any new development should enhance.

The proposed design seeks to emulate the design features of the listed building with the use of a strong gable form on the front elevation; however the new gables are much wider at their base (7m as opposed to 4.5m); this combined with the use of a 600mm deep outline to the gables makes the gable form used too dominant in the context of the adjacent listed building. I am also concerned about the small building which remains between the listed building and the proposed hotel. The spring point for the new gables is higher than the eaves line on Monmouth House

which results in it appearing more dominant in the street scene than the listed building and will consequently harm the setting of the listed building.

Conservation Area:

This conservation area is composed of buildings from several building periods and buildings from different periods are located next to one another as can be found in many town centres. Despite this there is a unity of street composition in the townscape with a strong building line either side of the High Street. The proposed scheme lies just to the south of one of the key spaces around the reconfigured Pond. The sequential view along the Parade and High Street adds value and significance to the conservation area and proposals which have an adverse impact on this view. The area appraisal notes that whilst there is a variation in building height there is a consistency in terms of materials and rhythm which creates a coherence to the street scape. The more modern buildings are not so positive in terms of the street scape and their contribution to the conservation area is less significant.

Monmouth House makes a strong and positive contribution to the conservation area and the street scene in this part of the conservation area; the building is the most dominant and high quality building in the street scape here and this balance between the listed building and other nearby buildings should be retained when considering new buildings for this part of the conservation area. Since its construction this building has been the most significant built form in the street scene.

The buildings which are to be demolished are identified in the CA Appraisal and contributing positively to the local character; they are representative of a particular type of building typology used in the inter war period. To justify the loss of these buildings the replacement buildings must be at least equal value in terms of the conservation area.

Impact of the proposed scheme: as set out above the proposed scheme seeks to respond sympathetically to the listed building and the character of the conservation area through a reinterpretation of the gabled features on Monmouth House. The issue is that the gables on the new building are bigger than those on the listed building and the strong brick grid which takes a lead from the timber decoration on the buildings at 99-107 The Parade. The roof of the proposed building would also be visually dominant and overpower the listed building. The result is that the proposed new building would completely dominate the street scene of the conservation area at this point and would be visually intrusive. This would cause harm to the character and appearance of the conservation area.

Locally Listed Buildings:

These are located slightly further away from the site than the listed building. The buildings at 99-107 The Parade are striking in their design making use of good red brick, which is patterned in places and a timber “Tudorbethan” style used; the building also has strong “Elizabethan” style chimneys. The somewhat heavy handed brick grid which is derived from the timber feature on these buildings will invite comparison and highlight the poor quality of the proposed building against the higher quality buildings elsewhere in the conservation area.

Conclusions regarding impact on heritage:

In heritage terms the proposed building would neither preserve nor enhance the character or appearance of the conservation area; would cause harm to both the conservation area and to the setting of the listed building in terms of the role of the listed building in the street scene now and historically. I have seen nothing to suggest that the harm is outweighed by the public benefits of the scheme.

Design Comments:

A two tier basement to the hotel providing car parking and a fitness facility is not likely to be viable. Both facilities can be found nearby and a hotel could seek arrangements for car parking to be provided for residents at an agreed rate in nearby local car parks with drop off facilities for those with mobility issues on Gaumont Approach.

Layout:

Ground floor relationship to the public realm is not great; the rear which is in effect a front rather than a back, so that the building is double fronted, has a blank frontage which is set back to allow the valet parking and access to the underground car park. This space is basically dead frontage and creates a poor environment with no passive surveillance and locations where antisocial behaviour could take place. The frontage onto The Parade is better as there is a large café window and an entrance to both the café and the hotel, however the internal layout shows the hotel reception desk to be further inside the hotel with no direct sightlines to the entrance from The Parade. The internal layout of the ground floor is poor – the restaurant has no windows and the entrance is tucked away down a corridor. The layout could be improved by extending the ground floor on the Gaumont Approach side so that the building line is the same as the upper floors; provide windows for

the restaurant which look out onto the Gaumont Approach space and removing the basement car park.

It is unclear how the cycle parking will be accessed; it looks like cyclists will be expected to use the same ramp as the cars; this is not the preferred approach. It is not clear from the basement plans whether there is sufficient space around the stands for manoeuvring bikes safely in relation to moving vehicles. With poor design there is a risk that the cycle parking will not be used. Also, there should be staff shower facilities and a locker area.

Upper floors: several of the rooms located on either side of the building will have a very poor outlook onto the side of adjoining buildings. Some of the hotel rooms appear quite cramped and no space for wardrobes or cupboards shown; these rooms are likely to be unpopular and could compromise the success of the hotel.

The elevation design has been considered in the discussion regarding impact on heritage assets.

Overall, the design is poor in relation to the context; there are issues with the internal layout arrangements particularly in relation to the ground floor and basement levels; I think it unlikely that the lower basement level will be viable and gym/leisure facilities are available elsewhere in the town. The proposed building has poor relationship with the public realm to The Parade and to Gaumont Approach. This combined with the impact on the heritage assets suggests that the proposal does not meet the high standard of design required by both the NPPF and the local plan policies for new buildings in sensitive locations such as this.

5.9 Contaminated Land Officer

No objection subject to a condition being imposed, were the Council minded to approve the application, to ensure that in the event that any contamination found during the works is reported and necessary remediation is agreed, carried out and verified.

5.10 Hertfordshire County Council Waste & Minerals Team

No objection. The Waste & Minerals Team recommends that a site waste management plan be submitted, approved and implemented should permission be granted.

5.11 Local Highways Authority (Hertfordshire County Council Highways)

No objection subject to a condition being imposed, were the Council minded to approve the application, that requires the submission, approval and implementation of a construction management plan.

5.12 Hertfordshire County Council (Lead Local Flood Authority)

The Lead Local Flood Authority (LLFA) has confirmed that the information provided does not provide a suitable basis for an assessment to be made of the flood risks arising from the proposed development and has therefore objected and recommended refusal of planning permission.

5.13 Thames Water

No objection subject to additional information being provided and agreed in relation to proposed drainage and groundwater discharge.

5.14 Arboricultural Officer

The comments of the Arboricultural Officer are summarised below:

The proposed redevelopment of the site will have some impact upon a highway tree (a red oak) located to the front of the property in the High Street. Whilst two quite significant limbs would need to be removed (this would offset any root disturbance) this would not significantly harm the visual amenity of the tree.

5.15 Environmental Health

The comments of the Environmental Health Officer are summarised below:

Given the location of the proposed premise, there will be a number of factors that we would need to take into consideration:

- Noise from the surrounding environment.
- Noise that will be generated by this business.
- There will also be a kitchen within the premise, but there is no information on the commercial extract.

Regrettably, if there is no information on how these impacts will be reduced or eliminated, there is insufficient information to assess the application and would recommend refusal.

5.16 Hertfordshire Constabulary Crime Prevention Design Service

The comments of the Crime Prevention Design Service are summarised below:

Type of Hotel: Whilst a hotel could be beneficial in this location, there are various points to consider as regards designing out crime, etc. It is not clear from the layout, but it would appear that the hotel will be a budget hotel? If so, sometimes there can be more issues with crime in such locations, than expensive hotels. These issues are persons working in the area and having works laptops and tools with them, which are often targeted to be stolen, when guests are staying at such hotels. Also persons using the room as an informal meeting place to do drug deals, prostitution, etc. I detail some mitigation measures below.

Parking: Will there be any parking for people staying at the hotel, and if not where will they be directed to park. Often hotel guests' vehicles are targeted overnight to steal from, and therefore it is important that any parking is suitable and has good CCTV coverage. If guests will be directed to a nearby council car park, there may be a need for an extra CCTV camera for that car park, to help protect guests' vehicles. I would not want hotel guests/deliveries blocking Gaumont Approach, and causing obstruction.

Storage for laptops, etc.: There should be a room safe per room, large enough to hold a laptop, so guests can secure their works laptop safely and other small valuables, without fear of them being stolen.

External recess areas: External recess areas in a town centre can cause problems by creating an area where Anti-Social Behaviour (ASB) can occur. From the proposed layout, I am pleased to see there are no proposed recess areas, other than by the main entrance, although this is overlooked by the hotel reception, so there is good natural surveillance over this area.

When plans are worked up at a later stage, then deliveries and bin storage need to be considered, and these should be secure and not have any recess areas.

CCTV: There should be CCTV covering the front reception and all who enter and leave the hotel main entrance. There should also be CCTV along the hotel corridors on the various levels, as well as any bar area, and rear external doors, to assist staff at reception have control of what is happening and to deter drugs, prostitution, etc. I would look for a condition regarding this, if a full planning application were made.

Use as Hotel: Sometimes budget hotels become by default, hostels/HMOs looking after homeless and Social Services customers. Such a large hotel being used for such ancillary use for residents on a more permanent basis than guests just staying a few nights, can lead to crime such as drugs, prostitution occurring, etc., especially in a town centre location. I would look for a condition to limit its use as a hotel only, and not to become a hostel, HMO, etc., due to its location, if a full planning application were made.

Noise Mitigation: Watford has a vibrant night time economy, and as such this can cause noise and disturbance for hotel guests staying nearby, unless noise mitigation is built into the new building. There is next to this proposed development Bar 83 which is a nightclub/bar, and other night time economy premises nearby. I would look for such noise mitigation to be built into any new hotel building.

6.0 Appraisal

6.1 Main issues

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

- (a) Principle of use
- (b) Scale and design
- (c) Impact on heritage assets
- (d) Impacts on surrounding properties and uses
- (e) Quality of accommodation and facilities
- (f) Transport, servicing and parking
- (g) Impact on trees
- (h) Plant and machinery
- (i) Anti-social behaviour and crime prevention
- (j) Sustainable drainage

6.2 (a) Principle of use

Land use designations

- 6.2.1 The site is located within the Town Centre Special Policy Area and also the Town Centre Primary Shopping Area, as detailed within Figure 6 (page 54) of the Watford Local Plan Core Strategy 2006-31 (CS). The ground floor level of the building forms part of the Secondary Retail Frontage as shown on the Watford District Plan 2000 (WDP2000) Proposals Map.

New hotel use

- 6.2.2 Policy SS1 of the CS advises that “The town centre will be the focus for shopping, leisure and cultural activities”. Paragraph 7.2.2 of the CS states that “The council is seeking to enhance the offer for families in the town centre and create a more balanced town centre which meets the needs of all residents and users at different times of the day and night” and that “the council will seek to ensure that the town centre’s vitality and viability are enhanced through the redevelopment of Charter Place and through encouraging additional retail and leisure development to locate in the town centre”. Paragraph 7.2.2 further advises that the council will encourage proposals which demonstrate that they support and enhance the town centre offer and will meet the objective of creating a more family friendly town centre.
- 6.2.3 Policy SPA1 of the CS advises that “Within the Primary Shopping Area, the main use will be retail with associated and complementary uses such as cafes and restaurants, mainly at ground floor level. On upper floors, uses which encourage a lively and vibrant town centre will be encouraged including residential, office and leisure use”.
- 6.2.4 The principle of a hotel use within the town centre is acceptable and in line with Policy TLC1 of the CS, which, in its accompanying Table 4 (page 58), identifies a need for centrally located 4 star or boutique hotels. However, it is clear from the submitted floorplans that the quality of the accommodation on offer is somewhat compromised; not offering the level of amenities one would expect for a 4 star or boutique hotel (see “Quality of accommodation and facilities” section below). In this regard, it is felt that the proposed hotel would not meet the objectives of the CS in terms of achieving the provision of high quality hotel accommodation.

Impacts on retail function 6.2.5 The proposal would result in the loss of the two existing retail units contained within the site (the newsagent at No. 75 and the charity shop at No. 81. N.B. the double-fronted unit occupying No.s 77-79 is currently in use as a restaurant). Notwithstanding the loss of the existing retail units, however, the new hotel would incorporate a café at ground floor level which would occupy more than half of the front portion of the building and which would present itself to the High Street. In this regard, the new hotel would continue to provide an active, commercial frontage across the majority of its front elevation. It is considered that the proposal would not cause any significant harm to the overall vitality and viability of the town centre given the range of other retail uses available within close proximity and would not, therefore, compromise the objectives of saved Policy S7 of the WDP2000. It is considered that a hotel use in this location has the potential to complement the other town centre uses that exist.

6.3 (b) Scale and design

- 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. At a national level, the government's planning guidance places a strong emphasis towards 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".
- 6.3.2 The proposed building would comprise four storeys to be built above ground level (and two basement storeys). It would incorporate a part pitched and part flat roof with three steeply-pitched gables at the front and three steeply-pitched gables at the rear. The existing building is part single and part two storey and is comparatively lower than some of the other buildings that exist within the town centre. There are taller buildings within the immediate vicinity of the site including those on the same side of The Parade as the subject site. It is felt that a building that is taller than the existing structure is acceptable in principle within a town centre location such as this. However, given the site's sensitive location which is within a conservation area and within close proximity to a statutory listed building (the grade II listed Monmouth House) and locally listed buildings, it is essential that the design, scale and massing respects these heritage assets and does not harm the visual amenity in general. The new building would rise higher than the three storey, listed Monmouth House building – located some 8 metres to the northwest of the site. It would also rise higher than the adjoining three storey building at 71-73 The Parade – located to the southeast. The building would have a fairly imposing impact on this part of the streetscene due to its height and massing and also its roof design which incorporates the use of strong gable features – discussed further in Section 6.4 below.
- 6.3.3 There is some uncertainty regarding the height of the neighbouring buildings as these are not shown consistently on the drawings. The existing elevations included on the drawing numbered WAT-EX-03 indicate that the adjoining building to the southeast (71-73 The Parade) measures 10.8 metres in height. The proposed elevations, however, indicate that the height of this adjoining building is 13.1 metres. Additionally, the front elevation included on the drawing numbered WAT-EX-03 indicates that the height of the adjoining building to the northwest (83 The Parade) is taller than the height of the subject building when viewed from the front. However, there is no such change in height. The drawings are not consistent and cannot be relied upon to provide an accurate representation of the relationship with the surrounding properties and its context within the streetscene.

6.3.4 The front elevation of the building would provide a continuous building line at ground floor level which would abut the pedestrianised part of the High Street, in the same way that the existing units address the street. The proposed upper floor levels would not follow the same front building line as the ground floor level and would, instead, feature a staggered arrangement with the northernmost part being setback from its southernmost part. Such treatment would create three vertical components to the building on the upper floor levels in a 'stepped' arrangement. Whilst the reasoning behind the staggered design of the upper floors on the front elevation is not explained within the application submission, it is likely that this articulation is an attempt by the architect to help reduce the impact that the building has on the listed building at Monmouth House and to respect the setback form of the upper level of the existing building and that at No.83. But it is felt that this design would result in a building form whereby the ground floor level appears somewhat separated from, and at odds with, the upper floors particularly where these are stepped back from the ground floor element i.e. the central and left-hand sections (when viewed from the High Street). This arrangement would result in the building having a rather disjointed appearance which would not make a positive contribution to the streetscene or the character and appearance of the Conservation Area.

6.3.5 The agent has referred to plans for the redevelopment of the site at 49-53 The Parade which were granted conditional planning permission in 2016 under application reference 16/00427/FUL. The approved, but yet to be implemented, scheme for 49-53 The Parade incorporates a three gable roof design that fronts the High Street. The agent appears to have cited this development to make the case that the new hotel would also adopt a similar form of architecture which takes its cue from the distinctive gables on the front elevation of Monmouth House. However, it is evident that the two schemes are markedly different from each other in terms of their overall design, appearance, height and scale. Additionally, while both sites are situated on the northeastern side of The Parade and within close proximity of each other, they do not have the same physical characteristics and do not share the same relationship with their respective surroundings. It must also be acknowledged that the site at 75-81 The Parade is located much nearer to a statutory listed building (that being Monmouth House) than the site at 49-53 The Parade and therefore it has a greater potential to affect the setting of this heritage asset. Having regard to the differences between the two schemes in terms of their form, their site's physical characteristics and their relationship with the surrounding built form, it is considered that they are incomparable. As such, the redevelopment of these two sites need to be considered on their merits based on their own individual circumstances.

- 6.3.6 The rear of the new hotel would abut Gaumont Approach and would incorporate, at ground floor level, a recessed area with an entrance leading into the reception area, a vehicular entrance to the ramped access that would lead into the basement car park, a taxi drop off/pick up lay by and a bin storage enclosure. The part of the rear elevation that would feature the entrance leading into the reception area would be surrounded by glazing allowing views into and out of the hotel towards/from Gaumont Approach. However, the rest of the ground floor rear elevation would feature no windows or glazing and would offer a bleak frontage to Gaumont Approach. The lack of any other openings here would result in an expanse of uninterrupted wall surface across a substantial portion of the rear elevation at ground floor level. This poor elevational treatment would be unattractive and would create a rather hostile environment with its expanse of dead frontage and lack of natural surveillance. The recessed nature of this part of the building would exacerbate its poor relationship with the street and the lack of passive surveillance.
- 6.3.7 While there would be some activity associated with the use of this area, for example, at times when guests arrive/leave by taxi, it is felt that overall this part of the building would offer a fairly unwelcoming appearance and a poor relationship with the public realm. It is accepted that the rear of the premises contained within the subject site do not currently offer a welcoming frontage within the Gaumont Approach streetscene; however, it is felt that a full-scale redevelopment of the site, such as that proposed, provides a good opportunity for this poor environment to be enhanced so as to make a positive contribution to, and add to the quality of, the area – as per the objectives of Policies UD1 and UD2 of the CS and paragraphs 58 and 64 of the NPPF. It is felt that with the current design, the opportunity to improve the environment in this location has been missed.
- 6.3.8 Overall, it is considered that the design is poor and would fail to respond positively to the site's context. It is also considered that proposed building would have a poor relationship with the public realm to The Parade and to Gaumont Approach. A design approach which seeks to incorporate a contemporary appearance and a roof form that incorporates gables, is not objectionable in principle. However, there are concerns that the design, in its current form, would fail to make the best opportunities of the site to create a high quality development that is demanded by both the local policies within the CS and the national objectives set out by the NPPF.

Materials

6.3.9 The design seeks to use glazed curtain walling at ground floor level on the front elevation. A large proportion of both the front and rear elevations on the upper floors would be glazed. The glazed elements on the front and rear elevations would be framed by brick elements. The use of these materials is considered to be acceptable in principle. Were the council minded to approve the application then further details of the exact materials could be secured by condition.

6.4 (c) Impact on heritage assets

6.4.1 The design of any scheme in this location requires careful consideration given the site's sensitive and prominent town centre location which is within the Civic Core Conservation Area and close to a statutory listed building (Monmouth House - which is a Grade II statutory listed building) and locally listed buildings. The proposed building must be assessed in terms of the impact on these designated heritage assets. At a local level, Policies UD1 and UD2 of the CS make clear that new development should respect and enhance the local character of the area in which it is located and should recognise and respond to features of historic value; safeguarding, understanding and promoting the historic environment (from historic buildings to strategic views).

6.4.2 Section 12 of the NPPF makes clear that in determining planning applications, local planning authorities should take account of: the desirability of sustaining and enhancing the significance of heritage assets (in this case the conservation area and listed buildings) and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.

6.4.3 New proposals are required to preserve or enhance the character and appearance of the conservation area and be of high quality design, as required by paragraphs 63 and 64 of the NPPF and as reinforced by Policy UD2 of the CS.

6.4.4 Paragraph 128 of the NPPF advises that "In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting." It further advises that "As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary". The application has not been accompanied by a heritage statement and the submitted design and access statement does not describe the significance of the assets affected.

Impact on Grade II listed building known as Monmouth House

- 6.4.5 The application site is separated from the listed Monmouth House by one relatively small building only; that being 83 The Parade. The original setting of the building has altered over time as the town centre has developed around the listed building. However, the listed building has retained its significance within the street scene and in the conservation area. Its gable form and its distinctive brick finish on its exterior walls create a significant sense of place which any new development should enhance.
- 6.4.6 The proposed design seeks to emulate the design features of Monmouth House with the use of a strong gable form on the front elevation. The new gables incorporated into the new building would be much wider at their base to those found on the front elevation of Monmouth House however (7 metres as opposed to 4.5 metres). The new gables would also incorporate a 600 millimetre deep brick surround that would give these a 'heavy' appearance. It is felt that the gable form used on the new hotel would negatively compete with that of Monmouth House and would appear dominant in the context of this neighbouring listed building. The submitted drawings also indicate that the eaves associated with the gables on the front of the hotel would be higher than the eaves line on the front elevation of Monmouth House. It is felt that this would result in the new building appearing more dominant in the street scene than the listed building which consequently would cause harm to the setting of the listed building.

Impact on character and appearance of the Civic Core Conservation Area

- 6.4.7 The Civic Core Conservation Area Character Appraisal recognises that whilst there is a variation in building height there is a consistency in terms of materials and rhythm which creates a coherence to the streetscape. The more modern buildings are not so positive in terms of the streetscape and their contribution to the conservation area is less significant. The buildings which are to be demolished are identified in the Civic Core Conservation Area Character Appraisal (paragraph 8.7) as contributing positively to the local character. They are representative of a particular type of building typology used in the inter war period and to justify their loss any redevelopment must be at least equal value in terms of the conservation area.
- 6.4.8 As set out in the 'Scale and design' section above, it is considered that the proposed development would fail to achieve a high quality appearance that would sit comfortably within the streetscene. It is felt that the scheme would not make a positive contribution on the character and appearance of the Civic Core Conservation Area.

Impact on the nearby locally listed buildings

- 6.4.9 Those locally listed buildings nearest to the subject site consist of: 58-68 The Parade – located directly opposite the site on the other side of The Parade; 97-99 The Parade – located approximately 35 metres northwest of the site and adjoining the northwestern side of Monmouth House, and; 101-117 The Parade – located approximately 50 metres northwest of the site.
- 6.4.10 The buildings at 97-99 The Parade and 101-117 The Parade have been constructed in red brick (patterned in part) with half timber detailing, and adopt a “Tudorbethan” style. The building at 101-115 The Parade also features “Elizabethan” style chimney stacks with a twisted, patterned brickwork design. The locally listed building at 58-68 The Parade has a different character and appearance to the aforementioned buildings and is Neo-Georgian in style.
- 6.4.11 It would appear that the brick-finished vertical and horizontal elements to be incorporated into the front and rear elevations of the new hotel are derived from the half timbering on the nearby locally listed buildings at 97-99 and 101-115 The Parade. It is considered that this approach would invite comparison and highlight the poor quality of the proposed building against the higher quality buildings found in the conservation area.

Conclusion regarding impacts on heritage assets

- 6.4.12 Overall, it is felt that the design of the building does not positively respond to the character or appearance of the conservation area or the setting of the nearby listed building.

6.5 (d) Impacts on surrounding properties and uses

- 6.5.1 Residential properties are located within the building known as 58-68 The Parade which sits on the opposite side of the High Street to the subject site. The distance between the proposed hotel and the aforementioned building opposite is approximately 22 metres. Whilst this would be below the 27.5 metres privacy separation distance between residential properties, as set out within the Residential Design Guide, it must be acknowledged that the new building would have a similar relationship to the building at 58-68 The Parade as that which exists between the front elevation of 71-73 The Parade and this neighbouring building. It is acknowledged that within a High Street location such as this, the separation between opposing buildings is largely dictated by the width of the High Street itself and it would not be reasonable to expect a new building to be setback from the boundary it shares with the public highway as this could upset the pattern of

development and the character of the area. The new building would respect the separation provided between buildings along this part of the High Street and in a built-up town centre location such as this, some mutual overlooking is to be expected. It is felt that the development would not result in any significant reduction to the levels of privacy currently enjoyed by the residents living within 58-68 The Parade. The distance between the proposed building and 58-68 The Parade is also considered sufficient to ensure that the flats contained within this neighbouring building do not suffer any significant loss of outlook or natural light.

6.5.2 Windows are to be inserted within the flank elevations and side-facing roofslopes of the new building and these would face those properties that directly adjoin the site on either side. The adjoining three-storey building to the southeast (71-73 The Parade) does not feature any windows within its side elevation that faces the subject site and the scheme would result in no loss of light, outlook or privacy to this property. The first floor windows within the northwest-facing elevation of the new building would face the flank wall of the adjoining two storey building known as 83 The Parade – which itself does not contain any windows. The new windows at second and third floor levels would allow views to be afforded over the roof of No. 83 and towards those windows that exist on the upper floors of the southeast-facing elevation of Monmouth House. According to the plans, a distance of 8 metres would separate the windows within the northwest-facing elevation of the new hotel and those contained within the southeast-facing elevation of Monmouth House. As such, there is the potential for some overlooking to occur between these buildings. There is also the potential for the new hotel building to have an impact on levels of natural light and outlook to/from the rooms served by these windows. Notwithstanding this, it is understood that these windows do not serve any residential accommodation and it is felt that reasonable levels of natural lighting and outlook would be maintained for non-residential uses.

6.5.3 It is considered that the proposed development would not prevent the surrounding business uses from being able to continue with their commercial activities.

6.6 (e) Quality of accommodation and facilities

Layout and amenities

6.6.1 Out of the 55 guest rooms proposed, 20 of these (equating to 36%) would be without a good level of outlook – either having their only windows facing, and sited within close proximity of, the flank elevations of the neighbouring buildings or being served solely by rooflight windows. Similarly, many of these rooms would suffer from poor levels of natural light due to the proximity of their windows to neighbouring structures. This type of arrangement would not only compromise the

amenities of the guests staying within the hotel but it also has the potential to affect the future development of the adjoining sites. Some of the rooms with side-facing windows would rely on their light being received via the adjoining properties. The light and outlook to these rooms would be dependent on how these neighbouring sites are developed themselves in the future. There is the potential that the development in its current form could jeopardise the future development of the neighbouring properties.

- 6.6.2 In addition, many of the guest rooms proposed would encompass only a small internal floor area and inadequate space to allow for a typical arrangement of furniture and the usual facilities that would be expected within a 4 star or boutique hotel room (i.e. a cupboard, desk, chair, television etc.) whilst also allowing enough room for guests to manoeuvre conveniently around such fixtures and fittings. In this regard, it does not appear that a 4 star or boutique hotel is proposed under the current submission as a significant proportion of the rooms would provide a level of accommodation which would be more in keeping with a budget hotel.
- 6.6.3 The submitted drawings show a substantial proportion of the guest suites (23 out of a total of 55 rooms) to cover a floor area of only 14 square metres including the shower rooms/bathrooms. The bedroom areas themselves contained within these suites would have less than 8.5 square metres floor area. It is also acknowledged that the majority of the shower rooms/bathrooms would also be limited in terms of internal floor area and would not appear to be large enough to accommodate a WC, hand basin and bath/shower with suitable manoeuvring space around these fixtures. While the council does not have an adopted policy which sets out minimum room size standards for hotel rooms (N.B. those contained within the Residential Design Guide relate to new residential development), there is a clear emphasis within the NPPF that new development should seek to secure high quality design and a good standard of amenity for all future occupants of buildings (paragraph 17). The NPPF further advises that new development should function well and create attractive and comfortable places to live, work and visit (paragraph 58). It is considered that the inadequate floor areas and contrived layout would fail to offer a high standard of accommodation and would contravene the objectives of the aforementioned paragraphs within the NPPF.
- 6.6.4 The submitted plans indicate that a restaurant would be provided at ground floor level. This would be separated from the café area at the front of the building and would not feature any window openings. Consequently, the restaurant would not benefit from any natural lighting or outlook. While natural light and outlook may not necessarily be essential for a restaurant, the lack of any window openings in this area further highlights the poor design and functionality of the building, particularly as an opportunity exists here to improve levels of lighting and outlook

within the restaurant whilst at the same time addressing the poor interface between the rear elevation of the building and the Gaumont Approach public realm.

Noise mitigation

- 6.6.5 Within this part of the Town Centre there are a number of late night establishments including nightclubs, restaurants and bars. Noise generated by the activity along the High Street can be substantial, particularly during weekends, and measures would need to be put in place in order to ensure that guests staying within the hotel are protected from noise disturbance. The application fails to demonstrate that suitable measures would be put in place to protect the hotel guests from external noise sources. This is also of particular concern given the potential for noise disturbance caused by the nearby late-night establishments and that created by air conditioning units and plant associated with commercial properties including those associated with the hotel use itself. The application fails to demonstrate that suitable measures would be put in place to protect the hotel guests from external noise sources. This would be contrary to the objectives of Policy SD1 of the CS, saved Policy SE22 of the WDP2000 and paragraphs 17 and 123 of the NPPF.

6.7 (f) Transport, servicing and parking

Car parking

- 6.7.1 There are a number of public car parks located within close proximity of the site and guests using the hotel would be able to use these facilities. The site is also in a highly accessible location being located within the town centre and close to Watford Junction Station, Watford High Street Station and Watford Underground Station as well as within easy reach of frequent bus services. It is therefore acceptable in principle for no car parking to be provided for the proposed use. Nonetheless, the application details the provision of 13 on-site car parking spaces to be accommodated within the basement. A taxi pick-up/drop-off bay is also shown to be provided at ground floor level at the rear of the hotel. Both the basement parking and pick up/drop-off area are to be accessed from Gaumont Approach.
- 6.7.2 Turning diagrams have been provided to show that a standard-sized car could access the car park using the proposed ramped entry point. However, it is considered that the layout of the car park detailed on the submitted floorplans would not offer a convenient means of parking in that some of the spaces would have only 3.6 metres of manoeuvring space between them and the lift/stairwell core (whereas parking standards dictate that a 6 metre apron be provided). As such,

drivers would be unable to manoeuvre into and out of some of the spaces with ease and convenience, if at all, when the neighbouring spaces are also occupied. Turning diagrams have not been submitted to demonstrate how these spaces would be manoeuvred into and out of. This impractical arrangement could not only result in inconvenience for users of the car parking area but could also result in safety issues.

Cycle parking

- 6.7.3 Cycle storage is to be provided within the basement. This is considered to be an acceptable location for cycle parking – offering both a secure and weatherproof means of storage. It is recognised that cyclists using the ramped access may come into conflict with drivers entering or egressing the car park area and the way this access route is managed and shared between users would require careful consideration were the scheme to be implemented in its current form.

Servicing

- 6.7.4 The submitted plans indicate that a bin storage area would be provided at the rear of the premises. This would be accessed from Gaumont Approach. Refuse collection vehicles would not be able to draw off the highway whilst bins are collected and instead would be required to wait on Gaumont Approach. However, given the relatively low volume of traffic using Gaumont Approach (which is not a thoroughfare) it is considered that refuse collection vehicles and other larger service vehicles required to wait on the public highway for temporary periods would not have a significant impact on the safety and freeflow of the adjacent highway.

Traffic generation

- 6.7.5 Given the sustainable location of the site and the range of public modes of transport on offer, it is considered that the scheme is unlikely to result in any material increase in traffic on the surrounding highway network. The Local Highway Authority has been consulted and has raised no objection to the scheme on highways grounds subject to a construction management plan being secured by condition.

6.8 (g) Impact on trees

- 6.8.1 The proposed development would have some impact upon a highway tree located on the High Street in front of the property. The council's Arboricultural Officer considers that two quite significant limbs would need to be removed to facilitate the works but has advised that this would offset any root disturbance. It is

considered that these works would not significantly harm the appearance of the tree, the amenity of the area or the character of the Civic Core Conservation Area.

6.9 (h) Plant and machinery

6.9.1 Given the nature of the hotel use and the proposed facilities that it seeks to incorporate, which includes a swimming pool, gym, spa, café, restaurant and commercial kitchen, it is reasonable to assume that plant and machinery will be required to service it. Such equipment may include air conditioning units, other air handling units, kitchen extract equipment or other plant. The submitted floorplans show an area allocated to “kitchen extractor/risers” on floor levels 1-3. However, other than this, the application has not indicated where any of the other servicing equipment would be provided or how the kitchen extract system would terminate at roof level. In some cases, details of the plant and machinery can be secured by condition but in the case of the subject site there is a danger that such equipment could lead to harm to visual amenity or the amenities of guests and neighbours. As such, it is felt necessary that a strategy which provides details of the equipment locations, housing and noise mitigation measures should accompany the application. Indeed, the Environmental Health Team has been consulted and has also raised concerns regarding the lack of information in regard to these matters. It has not been demonstrated that such systems can be installed without compromising the visual amenity of the area or the amenities of the occupiers of the hotel or its neighbours.

6.10 (i) Anti-social behaviour and crime prevention

6.10.1 The NPPF, in paragraph 58, makes clear that developments should “create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion”. This is supported by Policy UD1 in the CS which states “new development should minimise the opportunities for crime and anti-social behaviour through design that creates safe and attractive places”.

6.10.2 Concerns have been raised by Hertfordshire Constabulary regarding the potential for the hotel to allow criminal activity and anti-social behaviour to prosper (see ‘Consultations’ section of the report above). It is considered that some of the concerns raised by the Constabulary in terms of the potential for criminal activity would be dependent on how the hotel is managed and this would fall outside the scope of planning. There are, however, measures that would seek to reduce the potential for crime and anti-social behaviour that could be secured by condition were the Council minded to approve the application. These could include, for example, a condition to secure the installation of a suitable closed circuit television

(CCTV) system.

6.10.3 The inactive frontage at the rear of the hotel and its lack of natural surveillance is discussed in the 'Scale and design' section of the report above. It is considered that this dead frontage has the potential to result in the creation of an unwelcoming environment which could encourage anti-social behaviour, contrary to the aims of Policy UD1 of the CS and paragraph 58 of the NPPF.

6.11 (j) Sustainable drainage

6.11.1 Following a ministerial statement written by the Secretary of State for Communities and Local Government on 18 Dec 2014, all major planning applications submitted after 6th April 2015 are required to secure sustainable drainage systems (SuDS). This is reinforced by the Planning Practice Guidance (PPG) which states that "when considering major development, as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015, sustainable drainage systems should be provided unless demonstrated to be inappropriate". This requirement is supported by the objectives of paragraph 103 of the NPPF which emphasises the need to reduce flood risk.

6.11.2 The application has been accompanied by a SuDS report and the appropriate statutory consultee – that being the Lead Local Flood Authority (LLFA) has been consulted. The LLFA has reviewed the submitted report and has confirmed that the information provided does not provide a suitable basis for an assessment to be made of the flood risks arising from the proposed development. The LLFA has therefore recommended refusal based on the information provided. Taking into account the representation received from the LLFA, it is considered that the application fails to demonstrate that the development would not increase flood risk elsewhere, reduce flood risk overall and give priority to the use of sustainable drainage methods. For this reason, the application fails to comply with Policies SD1 and SD2 of the CS, paragraph 103 of the NPPF and the advice contained within the PPG.

7.0 Community Infrastructure Levy and s.106 planning obligations

7.1 Community Infrastructure Levy (CIL)

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

and is calculated at the time that planning permission is granted. The CIL charge applicable to hotel floorspace is £120m².

7.2 S.106 planning obligation

Following the adoption of the Community Infrastructure Levy, s.106 planning obligations can only be used to secure affordable housing provision and other site specific requirements, such as the removal of entitlement to parking permits in controlled parking zones and the provision of fire hydrants. In this case, there is no requirement for a planning obligation.

8.0 Inaccuracies with the submitted drawings

- 8.1 The submitted drawings incorporate the inaccuracies listed in the 'Recommendation' section below. Because of the inaccuracies, it is considered that the submitted drawings fail to provide an accurate representation of the proposed scheme and the relationship it would have with surrounding properties.

9.0 Conclusion

- 9.1 It is considered that the principle of providing a high quality hotel within a town centre location such as this is acceptable. However, for the reasons outlined in this report, it is considered that the proposal would not achieve a high quality development that functions well and adds to the overall quality of the area.
- 9.2 The design and form of the proposed building would fail to enhance the character and appearance of the Civic Core conservation area or the streetscene. The proposed development would compete with the nearby listed building and would have a detrimental impact on its setting.
- 9.3 It is felt that the poorly conceived layout would fail to achieve a development that would function well and that would create an attractive and comfortable place for its users.
- 9.4 The proposal fails to demonstrate that suitable servicing equipment could be provided without causing further harm to the visual amenity of the site and its surroundings or the amenities of neighbouring occupiers. Furthermore, the scheme fails to demonstrate that adequate noise mitigation measures could be achieved to ensure that the amenities of guests and neighbours are suitably protected against.
- 9.5 The information provided does not provide a suitable basis for an assessment to be made of the flood risks arising from the proposed development. Consequently, the application fails to demonstrate that the development would not increase flood risk

elsewhere, reduce flood risk overall and give priority to the use of sustainable drainage methods.

10.0 Human Rights implications

- 10.1 The refusal of planning permission will have a significant adverse impact upon the human rights of the applicants to develop their land. However, in this instance it is considered that the adverse impact of the development upon the human rights of the third parties outweighs the impact upon the human rights of the applicants.
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11.0 Recommendation

That planning permission be refused for the reasons listed below:

1. The proposed building, by virtue of its design, scale and form, would fail to respond positively to the site's context and would cause harm to the visual amenity of the area. The building would incorporate a staggered building line on the upper floors of its front elevation. This design would result in a building form whereby the ground floor level (which incidentally would follow a continuous building line) would appear somewhat separated from, and at odds with, the upper floors. This arrangement would result in the building having a disjointed appearance. Additionally, the rear elevation would offer a rather hostile appearance at ground floor level that would not provide an attractive interface with the public realm and which may present opportunities for anti-social behavior. Overall, it is considered that the scheme would fail to make a positive contribution to the visual amenity of the area, the streetscene or the character and appearance of the Civic Core Conservation Area and would fail to minimise the opportunities for crime and anti-social behavior through design that creates safe and attractive places. This would be contrary to Policies SS1, UD1 and UD2 of the Watford Local Plan Core Strategy 2006-31 and paragraphs 17 and 58 and of the National Planning Policy Framework (NPPF).
2. The proposed roof of the building would incorporate a gable form which appears to take its cue from Monmouth House and the buildings at 97-99 The Parade and 101-117 The Parade. The proposed front and rear elevations would also incorporate brick horizontal and vertical elements which would appear to be derived from the half timbering on the buildings at 97-99 The Parade and 101-117 The Parade. Given the strong form and scale of the proposed gables, it is felt that these would appear dominant in the context of the streetscene and would compete with those found on the nearby listed and locally listed buildings which are proportionately smaller,

lower in height and less dominant overall. Similarly, it is felt that the elevational approach would invite comparison and highlight the poor quality of the proposed building against the higher quality buildings found in the area. Consequently, it is considered that the proposed development would have an adverse impact on the character and appearance of the Civic Core Conservation Area in which it is located and would also have an adverse impact on the setting of the nearby Grade II listed building known as Monmouth House, contrary to the objectives of Policies UD1 and UD2 of the Watford Local Plan Core Strategy 2006-31 and paragraphs 17, 58, 64, 133 and 137 of the National Planning Policy Framework (NPPF).

3. The proposed hotel, by reason of its poorly conceived layout, would fail to achieve a development that would function well and that would create an attractive and comfortable place for its users. A significant proportion of the proposed guest rooms would suffer from poor levels of natural light and outlook and would suffer from a lack of internal space that would not allow a typical arrangement of the furniture, fixtures and fittings usually expected within a hotel. Additionally, the restaurant would not be provided with any natural lighting or outlook and would not have an active frontage with the public realm despite it being apparent that there is an opportunity to allow this in the interests of enhancing the scheme. Furthermore, the parking arrangement within the basement shows an impractical layout for manoeuvring into and out of some of the proposed car parking spaces due to the limited amount of manoeuvring space afforded to them particularly taking into account their proximity to the stairwell and lift core. Overall, it is considered that the scheme would fail to optimise the potential of the site and would fail to take the opportunities available for improving the character and quality of the area and the way it functions. It would also fail to provide a good standard of amenity for all existing and future occupants of land and buildings. As such, the development contravenes the objectives of paragraphs 17, 58 and 64 of the National Planning Policy Framework (NPPF), saved Policy T21 of the Watford District Plan 2000 and Policies SS1 and UD1 of the Watford Local Plan Core Strategy 2006-31.
4. Given the nature of the proposed hotel use and the facilities that it seeks to incorporate, which include a swimming pool, gym, spa, café, restaurant and commercial kitchen, it is reasonable to assume that plant and machinery would be required to service it. Such equipment may include air conditioning units, other air handling units, kitchen extract equipment or other plant. The submitted floorplans show an area allocated to “kitchen extractor/risers” on floor levels 1-3. However, other than this, the application has not indicated how any of the other servicing equipment would be provided or how the kitchen extract system would terminate at roof level. It has not been demonstrated that such systems could be installed on this site without compromising the visual amenity of the area including that of the

character and appearance of the Civic Core Conservation Area, the setting of the nearby listed building and/or the amenities of the occupiers of the hotel or its neighbours. This would be contrary to the objectives of paragraphs 17, 58 and 64 of the National Planning Policy Framework (NPPF), saved Policy SE22 of the Watford District Plan 2000 and Policies SS1, UD1 and UD2 of the Watford Local Plan Core Strategy 2006-31.

5. Within this part of the Town Centre there are a number of late night establishments including nightclubs, restaurants and bars. Noise generated by the activity along the High Street can be substantial, particularly during weekends. This is of particular concern given the potential for noise disturbance caused by the nearby late-night establishments and that created by air conditioning units and plant associated with surrounding commercial premises and the proposed hotel use itself. The application fails to demonstrate that suitable measures would be put in place to protect the hotel guests from external noise sources. This would be contrary to the objectives of Policy SD1 of the Watford Local Plan Core Strategy 2006-31, saved Policy SE22 of the Watford District Plan 2000 and paragraphs 17 and 123 of the National Planning Policy Framework (NPPF).
6. The application has been accompanied by a sustainable drainage systems report. However, the information provided does not provide a suitable basis for an assessment to be made of the flood risks arising from the proposed development. Consequently, the application fails to demonstrate that the development would not increase flood risk elsewhere, reduce flood risk overall and give priority to the use of sustainable drainage methods. For this reason, the application fails to comply with Policies SD1 and SD2 of the Watford Local Plan Core Strategy 2006-31, paragraph 103 of the National Planning Policy Framework (NPPF) and the advice contained within the Planning Practice Guidance (PPG).
7. A significant proportion of the 55 guest rooms proposed, would be served solely by windows on the side-facing elevations and roofslopes of the building. This type of arrangement has the potential to affect the future development of the adjoining sites. Some of the rooms with side-facing windows would rely on their light being received via the adjoining sites. The light and outlook to these rooms would be dependent on how these neighbouring sites are developed themselves in the future. There is the potential that the development in its current form could jeopardise the future development of the neighbouring properties. In this regard, the development does not meet the aims of paragraphs 17 and 58 of the National Planning Policy Framework (NPPF) which seek to ensure that developments: function well and add to the quality of the area, not just for the short term but over the lifetime of the development, and; secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.

8. The submitted drawings incorporate the inaccuracies listed below (please note that this list is not exhaustive and other inaccuracies that are not identified in the list below may also exist) and, therefore, fail to provide an accurate representation of the proposed scheme and the relationship it would have with surrounding properties.
- The existing elevations included on the drawing numbered WAT-EX-03 indicate that the adjoining building to the southeast (71-73 The Parade) measures 10.8 metres in height. The proposed elevations, however, indicate that the height of this adjoining building is 13.1 metres. The drawings are not consistent with each other and the relationship that the proposed building would have with the neighbouring buildings and the public realm has not been clearly demonstrated.
 - The front elevation included on the drawing numbered WAT-EX-03 is entitled “Existing and Proposed Front Elevation”. However, this drawing does not represent the proposed front elevation which, incidentally, is detailed on the drawing numbered WAT-PR-03. The drawings are inaccurate and misleading in this regard.
 - The front elevation included on the drawing numbered WAT-EX-03 indicates that the height of the adjoining building to the northwest (83 The Parade) is taller than the height of the subject building when viewed from the front. However, there is no such difference in height between the buildings at the front and the drawings are inaccurate and misleading in this regard.

Informatives

1. In dealing with this application, Watford Borough Council has considered, in a positive and proactive manner, whether the planning objections to this proposal could be satisfactorily resolved within the statutory period for determining the application, 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 proposal is not considered to achieve an acceptable and sustainable development for the reasons set out in this decision notice. The Council would nevertheless encourage discussion of alternative acceptable proposals by making use of the pre-application advice service, details of which are available on the Council’s web site.

Drawing numbers

WAT-EX-02
WAT-EX-03
WAT-PR-02
WAT-PR-03
WAT-PR-04
WAT-PR-05
WAT-PR-06
WAT-PR-08
WAT-PR-09
WAT-PR-10
WAT-PRtrk-01
WAT-PRtrk-02
Computer generated image (unnumbered)

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