



**WATFORD
BOROUGH
COUNCIL**



DEVELOPMENT MANAGEMENT COMMITTEE

6 December 2022

7.00 pm

Town Hall Annexe, Watford

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Committee Membership

Councillor P Jeffree (Chair)

Councillor R Martins (Vice-Chair)

Councillors N Bell, J Pattinson, A Saffery, G Saffery, R Smith, S Trebar and M Watkin

Agenda

Part A – Open to the Public

CONDUCT OF THE MEETING

The committee will take items in the following order:

1. All items where people wish to speak and have registered with Democratic Services.
2. Any remaining items the committee agrees can be determined without further debate.
3. Those applications which the committee wishes to discuss in detail.

1. **Apologies for absence**

2. **Disclosure of interests**

3. **Minutes**

The [minutes](#) of the meeting held on 1 November 2022 to be submitted and signed.

4. **22/00983/FUL - 91-93 King Georges Avenue, Watford, WD18 7QE (Pages 5 - 27)**
5. **22/00866/FULM – 252-272 Lower High Street Watford WD17 2JJ (Pages 28 - 85)**
6. **22/01091/FULM – Cambridge House 47 Clarendon Road Watford (Pages 86 - 109)**
7. **22/00215/FULM - The Orient Centre Greycaine Road (Pages 110 - 130)**

Introduction

Please note that the officer report is a summary of the issues including representations made and consultation responses. Full details of the applications, plans submitted, supporting information and documents, representations made, consultation responses and correspondence can be found on the council's web based [Public Access system](#) using the application reference or address.

Specific policy considerations for each application are detailed within the individual reports. The background papers and policy framework listed below have been relied upon in the preparation of the reports in this agenda.

Background papers

- The current planning applications under consideration and correspondence related to that application.
- All relevant third party representations and consultation replies received.

Policy Framework

- The Statutory Plans and Supplementary Planning Guidance, together with relevant Government legislation, Circulars, Advice, Orders, Directions and Guidance listed below:

Local Planning Documents

Local Development Documents provide the framework for making planning decisions. These can be found on the Council's [website](#) and include:

- The Watford Local Plan 2021-2038 (adopted 17 October 2022); and
- Supplementary Planning Documents.

County Planning Documents

The Hertfordshire Waste Local Plan and Minerals Local Plan prepared by Hertfordshire County Council are material considerations alongside the Watford Local Plan. These documents can be found on the county council's [website](#).

National Planning Documents

Key legislation can be found using this [weblink](#), including:

- Growth and Infrastructure Act (2013)
- Housing and Planning Act (2016)
- Localism Act (2011) and subsequent amendments

- Planning Act (2008) and subsequent amendments
- Planning and Compulsory Planning Act (2004) and subsequent amendments
- Town and Country Planning Act (1990) and subsequent amendments
- Town and Country Planning (Local Planning) (England) Regulations 2012 and subsequent amendments.

National guidance can be found on the government service and information [website](#), including:

- National Planning Policy Framework (revised July 2021) and supporting Technical Guidance
- Planning Practice Guidance (PPG) (web based)
- Planning policy for traveller sites
- Relevant government circulars
- Relevant Ministerial Statements (which will be referred to in the individual reports as necessary)

Section 106 Planning obligations and 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 where relevant. Section 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 off-site highways works.

Human Rights implications

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. This may take the form of conditions or planning obligations on any grant of planning permission or, in some cases, a refusal of planning permission. With regard to any infringement of third party human rights, where these are not considered to be of such a nature and degree as to override the human rights of the applicant the refusal of planning permission may not be warranted.

Committee date	Tuesday 6 December 2022
Application reference Site address	22/00983/FUL - 91-93 King Georges Avenue, Watford, WD18 7QE
Proposal	Proposed demolition of no.91 and no.93 and the erection of an apartment block consisting of 9 flats and associated car parking and landscaping
Applicant	Mr Andy Dhruva
Agent	Boyer
Type of Application	Full Planning Permission
Reason for committee Item	Number of Objections
Target decision date	Wednesday 7 December 2022
Statutory publicity	Neighbour Letters and Site Notice
Case officer	Andrew Clarke, andrew.clarke@watford.gov.uk
Ward	Holywell

1. Recommendation

- 1.1 That planning permission be granted subject to conditions, as set out in section 8 of this report.

2. Site and surroundings

- 2.1 The application site measures approximately 0.28 hectares in area and contains a pair of semi-detached dwelling houses. To the south, Hanover Court, a twenty-first century, three storey, development comprised of thirteen flats to the north and a row of six garages in front of Hanover Court. Hard and soft landscaping surround the buildings and garages.
- 2.2 The application site is located in a well-established residential area in west Watford. A local centre is located in proximity to the site on Whippendell Road to the southwest, with amenities including a convenience store, health centre, nursery and pre-school facilities.
- 2.3 The application site is not located within a conservation area and there are no statutory or locally listed buildings either on the site or within close proximity. The site is not subject to any specific planning designations. The site falls within the Environment Agency's flood zone 1, the zone with the lowest probability of flooding.

3. Summary of the proposal

3.1 Proposal

This application seeks to demolish the pair of semi-detached houses (numbers 91 and 93 King Georges Avenue) and redevelop this part of the site to create a three storey building comprised of 9 dwellings. Hanover Court to the north would remain. The row of six garages would also be demolished and the land to the front of the buildings would be reconfigured.

3.2 Conclusions

The principal of demolishing the semi-detached houses and optimising the residential use of the site with a residential development which includes five, three bedroom units suitable for families is considered acceptable in principle. Hanover Court, the adjacent flatted development within the site replaced a pair of semi-detached houses in around 2005.

3.3 The proposed building would sit comfortably within the street scene of King Georges Avenue, and its external appearance would enhance the character and appearance of the area.

3.4 The scale and massing of the proposal, which was further reduced by amendments sought by the case officer ensure that the development does not have an overbearing impact or cause loss of outlook and privacy to neighbouring residential dwellings. These amenity matters were the reasons an earlier proposal was dismissed by the planning inspectorate in 2022.

3.5 It is therefore concluded that the proposed development accords with the development plan as a whole and so it is recommended for approval, subject to conditions.

4. Relevant policies

4.1 Members should refer to the background papers attached to the agenda. These highlight the policy framework under which this application is determined. Specific policy considerations with regard to this particular application are detailed in section 6 below.

4.2 Paragraph 11 d) of the National Planning Policy Framework 2021 (NPPF) establishes the 'presumption in favour of sustainable development' and the principles of the 'tilted balance' that apply where a local planning authority cannot demonstrate a 5 year housing supply or have failed to deliver at least 75% of their housing requirement as part of the Housing Delivery Test. Where the tilted balance applies, decision makers should grant permission unless

NPPF policies on protected areas or assets of particular importance provide a clear reason for refusing development or, any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, assessed against NPPF policies taken as a whole. The tilted balance has the effect of shifting the weight in the planning balance away from local policies and towards the NPPF.

- 4.3 The Council scored below 75% in the most recent Housing Delivery Test results and therefore the 'tilted balance' applies to the determination of this planning application.

5. Relevant site history/background information

- 5.1 Hanover Court, the three storey, development comprised of thirteen flats to the north of the site was granted planning permission at appeal in May 2005 (reference: 04/00750/FULM). This site originally contained a pair of semi-detached houses numbered 87 to 89 King George Avenue. This building was constructed soon after planning permission was granted.
- 5.2 The owner of Hanover Court has acquired numbers 91 and 93 King Georges Avenue and has submitted four previous applications for this site within the last three years. One of these applications was appealed following refusal. A pre application submission was made prior to the four applications and the appeal. The application history is explained in chronological order below.
- 5.3 Pre application advice was sought for the demolition of two dwellings and erection of apartment block was received in March 2019 (reference: 19/00310/PREAPP). A written response was issued on 14th May 2019.
- 5.4 An application for the demolition of two dwellings and the erection of an apartment block containing fourteen dwellings was received in September 2020 (reference: 20/00969/FULM). Following officer feedback the application was withdrawn by the applicant on 14th November 2020.
- 5.5 An application for the demolition of two dwellings and the erection of an apartment block containing nine dwellings was received in February 2021 (reference: 21/00218/FUL). Planning permission was refused at the Development Management Committee on 27th July 2021. The application was refused for the following two reasons:
- The design of the development was out of keeping with the character and appearance of the area.

- Harm to the amenity of 95 King Georges Avenue and numbers 12 to 28 (evens) Cassiobridge Road.

5.6 The above refusal of planning permission was appealed to the planning inspectorate (planning inspectorate reference: APP/Y1945/W/21/3281536). The planning inspectorate concluded that the proposal would not cause unacceptable harm to the character or appearance of the area, though agreed that it would cause unacceptable harm to the living conditions of 95 King Georges Avenue and numbers 12 to 28 (evens) Cassiobridge Road. The appeal was dismissed on the harm to neighbouring amenity in January 2022.

5.7 An application for the demolition of two dwellings and the erection of an apartment block containing nine dwellings was received in November 2021 (reference: 21/01563/FUL). This application was refused by officers for the following four reasons:

- The design of the development was out of keeping with the character and appearance of the area.
- Harm to the amenity numbers 12 to 28 (evens) Cassiobridge Road.
- The poor quality of accommodation.
- The positioning of the refuse store adjacent to the highway.

5.8 An application for the demolition of two dwellings and the erection of an apartment block containing eight dwellings was received in April 2022 (reference: 22/00486/FUL). The plans submitted were considered to be inadequate containing inconsistencies which meant an accurate assessment could not be made. The application was returned to the applicant on 12th July 2022.

5.9 The applicant selected a different architect and this application was received in August 2022. Following officer feedback the plans were amended. The second floor rear dwelling removed and ground floor front dwelling subdivided into two dwellings. A public re consultation was undertaken on the amended plans. The re consultation closed on 11th November 2022.

6. Main considerations

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

- (a) Principle of residential development
- (b) Impact on the character and appearance of the area
- (c) Impact on the living conditions of neighbouring properties
- (d) Standard of amenity for existing and future occupiers

- (e) Access, parking and highway matters
- (f) Environment and biodiversity

6.2 (a) Principle of a residential development

Strategic Policy HO3.1 states that proposals for residential development will be supported where they contribute positively towards meeting local housing needs and achieving sustainable development. Developments should make optimal use of land and provide a mix of homes. In this case, the proposal provides 5 x 3 bed family homes within an established residential area.

6.3 In respect of density and optimising the use of land, the site is outside the Core development Area and the minimum density to be achieved is 45 dwellings per hectare. In this case, when accounting for Hanover Court which is with the site boundary a density of 79 dwellings per hectare is achieved.

6.4 Optimal density for individual sites should be established through careful consideration of local character, context and access to amenities and public transport. These matters are considered further below.

6.5 Policy HO3.3 requires developments of 10 dwellings or more to provide at least 35% affordable housing. At 9 dwellings, there is no requirement to provide affordable housing in this case. Given the density achieved, which significantly exceeds the minimum, the site has been optimised and the provision of 9 dwellings is accepted.

6.6 (b) Impact on the character and appearance of the area

Strategic Policy QD6.1 seeks to deliver high quality design across the borough. The borough is divided into 3 distinct areas – Core Development Area, Established Areas and Protected Areas - with a separate approach for each area. The application site is within an Established Area where the degree of change will be more limited than in the Core Development Area but is expected to result in a gentle uplift in the density of the area. Proposals should be led by the existing characteristics of the local area and should reinforce and where appropriate enhance the character of the area.

6.7 Policy QD6.2 gives more detailed design principles for new development including sustainable design, character and identity, built form, active frontages, connectivity and views. Policy QD6.3 seeks safe, accessible, inclusive and attractive public realm. Policy QD6.4 builds on these policies and gives detailed design guidance on how these design principles can be achieved. Policy QD6.5 concerns building height and gives base building heights for the 3 Strategic Development Areas (which make up the Core Development Area) and those areas outside the Core Development Area. For

areas outside the Core Development Area the base building height is 4 storeys.

- 6.8 This application seeks to demolish the pair of semi-detached properties (numbers 91 and 93 King Georges Avenue) and redevelop this part of the site to create a three storey building comprised of 9 dwellings. Hanover Court to the north would remain. The row of six garages would also be demolished and the land to the front of the buildings would be reconfigured.
- 6.9 The principle of demolishing the pair of semi-detached and constructing a flatted development has been accepted by the previous applications and at appeal. The planning inspector noted that the central section of King Georges Avenue is comprised of two-storey dwellings of a generally similar scale though three storey flatted development exist nearby at Alwin Place, Argyle Court and Hanover Court which is within the site. These three nearby developments are all readily appreciable King Georges Avenue.
- 6.10 The proposed building would have a greater width, depth and height than the nearby two-storey dwellings and the pair of semi-detached dwellings it would replace. This increase in scale is considered appropriate relating to the local context in accordance with Local Plan Policy QD6.2. The proposed building would be comprised three storeys to the front and two storeys to the rear, with the rear part of the building having a lower floor level. These is the same heights as neighbouring Hanover Court. The lower building height to the rear relates well with the two storey dwellings on Cassiobridge Road.
- 6.11 Externally the building would have projecting gables with recessed elements including balconies, panels and window openings. The ground floor level of the building would be finished in grey brick, with red brick used on upper levels. The design and access statement asserts that the windows would be timber and the plans indicate these would be grey. The facades and their detailing appear to have a positive relationship with the street enhancing the character and appearance of the area in accordance with Local Plan Policy QD6.4. In order to ensure the building has a high quality external appearance detailed drawings and details of all materials used externally on the building will be secured by condition.
- 6.12 The demolition of the row of garages and the reconfigured frontage creates a more legible and permeable open environment to between the proposed building, Hanover Court and the public highway.

6.13 (c) Impact on the living conditions of neighbouring properties

The nearest properties to the application site are Hanover Court, number 95 King George's Avenue and the rear gardens of two-storey terraced dwellinghouses at 12 to 40 (evens) Cassiobridge Road to the west.

6.14 *Hanover Court*

The proposed building would be positioned 2.7 metres from Hanover Court. The dwellings within Hanover Court face the front (east) or the rear (west) of the site. The southern side elevation facing the proposed building contains only bathroom windows. The proposed building would be positioned forward of Hanover Court, though the impact to neighbouring amenity would be low.

6.15 *95 King Georges Avenue*

The proposed flatted building would reduce in width to the rear of the building with the deepest element having two storeys and being set in 10.2 metres from the common boundary. The front, three storey element would be positioned 5 metres from the common boundary with 95 King Georges Avenue and extend 3.4 metres beyond its rear elevation.

6.16 Compared to the previous proposal considered at appeal, the front, three storey element would be 0.5 metres further away and 0.6 metres shallower. The rear part of the building has been reduced in height from three storeys to two. The reduction in bulk and massing to this (southern) side of the building makes the proposal significantly less visible from the rear windows of this neighbouring property. In addition the building would no longer breach the 45 degree line, as it did previously. It is considered that the overbearing impact of the development and the loss of outlook considered harmful by the planning inspector have been successfully mitigated by the reduction in the scale and massing of the proposal, particularly to the southern side.

6.17 The side facing windows from the communal staircase would be obscure glazed to ensure no overlooking.

6.18 *12 to 40 (evens) Cassiobridge Road*

The rear of the proposed building would be 25.4 metres from the nearest property on Cassiobridge Road. This nearest property is the single storey rear extension on number 16 Cassiobridge Road. The closet point measurement from an original rear outrigger is 28.2 metres. Some of these neighbouring properties have single storey rear extensions, other do not, so the separation distances vary. Section 7.3.16 of Watford's Residential Design Guide (RDG) states that 27.5 metres should be achieved between rear elevations of new houses and existing houses.

- 6.19 The building would also be 15 metres from the rear boundary. Section 7.3.16 of the RDG states also states that a minimum direct distance between upper level habitable rooms on a rear elevation and property boundaries of 11 metres should be achieved in order to minimise overlooking.
- 6.20 Compared to the proposal considered at appeal, the rear wall of the building would be 2.8 metres shorter and one storey lower. This is 2.4 metres behind the rear building line of neighbouring Hanover Court. In addition to this the rear part of the proposed building would be stepped down addressing the ground levels which slope slightly downwards towards the rear.
- 6.21 The planning inspector considered the three storey height to the rear of the previous proposal and the separation distances involved harmful. It is considered that the loss of privacy considered harmful by the planning inspector has been successfully overcome in this submission by the lower building height and the increased separation distances.
- 6.22 (d) Standard of amenity for existing and future occupiers
The development would create:
- 5 x 3 bedroom dwellings; and
 - 4 x 1 bedroom dwellings.
- 6.23 All of the proposed dwellings meet or exceed the nationally described space standards and have private amenity space in accordance with Policy HO3.11 of the Local Plan. Communal amenity space is also provided to the rear of the building. Within Hanover Court the dwellings on the ground floor have private garden areas, though dwellings on the upper levels do not. The communal amenity space for existing residents of Hanover Court would remain.
- 6.24 All of the three bedroom dwellings proposed are dual aspect and all of the one bedroom units are single aspect. A daylight sunlight assessment has been submitted with the application which demonstrates compliance with the latest guidance from the BRE 'Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice' (3rd Edition, 2022).
- 6.25 The existing cycle store for Hanover Court would be demolished and relocated to the rear of the site. A further cycle store for occupants of the proposed building would be positioned to the south side of the site. The quantity of cycle spaces provided for the proposed dwellings accords with provision required by Local Plan Policy ST11.4. The existing timber refuse store would be demolished and a larger refuse store constructed with sufficient waste capacity for existing residents of Hanover Court and prospective occupants of

the proposed building. Conditions would be applied which require details of these structures and continued cycle and refuse provision for existing residents whilst the new building is constructed.

- 6.26 Policy HO3.10 requires all new homes to meet or exceed the nationally described space standard and to comply with M4(2) of the Building Regulations relating to accessibility. The applicant has explained that two of the one bedroom units would only comply with M4(1) with the other seven complying with M4(2). Given that this application was submitted prior to this policy being adopted, this is considered acceptable.
- 6.27 (e) Access, parking and highway matters
The site is located within walking distance of a supermarket, health centre, nursery and pre-school facilities on Whippendell Road. Watford Town Centre approximately 1.2 miles from the site. Bus route 321 stops nearby on Whippendell Road and has a weekday daytime frequency of 3 buses per hour. The site is considered to have an accessible location.
- 6.28 Policy ST11.5 sets car parking standards for new development. For dwellings outside the Core Development Area, the maximum provision is 1 space per dwelling. The proposed development would provide 1 space per dwelling, in a reconfigured parking area. The existing 13 parking spaces for Hanover Court, which also equates to 1 space per dwelling would be re provided in a reconfigured parking area. This policy also requires 20% of parking spaces to have active charging points for electric vehicles. However, this is now a requirement for all new houses under the Building Regulations 2022, therefore 9 active charging points for electric vehicles would have to be provided.
- 6.29 The existing vehicle crossover into the site and a lamp post require repositioning. These works would require agreement with Hertfordshire County Council as the Highway Authority under the Highways Act 1980. The additional number of dwellings and the associated number of vehicle trips generated would not result in any adverse highways impacts.
- 6.30 (f) Environment and biodiversity
Strategic Policy CC8.1 states that the Council will support proposals that help combat climate change and new development will need to demonstrate how it contributes positively towards this. Policy CC8.3 seeks to minimise the impact of new housing on the environment through energy and water efficiency measures. This includes a 19% improvement in carbon emissions over the target emission rate in the Building Regulations 2013 and a standard of 110 litres of water use per person per day. The applicant has confirmed the

water efficiency measures will be achieved and this can be secured by condition. No details have been submitted with the application regarding sustainable construction or energy efficiency and no renewable energy systems are currently proposed. However, under the new Building Regulations 2022 (effective from June 2022) all new residential development must achieve an improvement of 40% in carbon emissions over the target emission rate in the Building Regulations 2013. This exceeds the policy requirement.

- 6.31 Strategic Policy NE9.1 states that new development will be expected to demonstrate a positive impact on the natural environment. Appropriate measures include, inter alia, minimising the impacts on biodiversity and achieving a net gain, reducing the risk of flooding including surface water flood risk, protecting trees and encouraging native planting. Policy NE9.4 seeks to avoid and mitigate all forms of flood risk. Policy NE9.5 seeks to reduce the risk of surface water flooding through the use of effective sustainable drainage systems. Policy NE9.8 seeks a biodiversity net gain of 10% or more through the use of the Defra Biodiversity Metric.
- 6.32 In respect of biodiversity, no biodiversity assessment was submitted with the application (at the time of submission in August 2022 there was no requirement for this). The site and surroundings do not contain any trees protected by a Tree Preservation Order (TPO) and there are none close to the perimeter of the site. The proposal does show that trees which were planted in front of Hanover Court in around 2005 would be felled. These trees would be replaced by additional planting to the front of the buildings and within the parking area. The trees to the rear of the site would be retained. To ensure the development provides suitable replacement biodiversity a condition requiring details of soft landscaping is imposed on the decision.
- 6.33 The application includes a Preliminary Roost Assessment for bats. The existing two houses and the row of six garages were surveyed. The report concludes that the potential to support roosting bats is low and does not recommend any further surveys.
- 6.34 The site is not within a flood risk area (Flood Zone 1) and also incorporates a surface water drainage system to manage surface water runoff and minimise the potential for flooding. This will result in a betterment in surface water runoff and is acceptable. This can be secured by condition. Page 13

7 Consultation responses received

7.1 Statutory consultees and other organisations

Name of Statutory Consultee / Other Organisation	Comment	Response
Hertfordshire County Council Highways	Clarifications were sought, though no objection in principle.	Noted.

7.2 Internal Consultees

Name of Statutory Consultee / Other Organisation	Comment	Response
Watford Borough Council Arboricultural Officer	No response received.	N/A
Watford Borough Council Waste and Recycling	No objection.	Noted.

7.3 Interested Parties

Letters were sent to 118 properties in the surrounding area. This includes properties within Hanover Court. These properties were all re consulted when the proposal was amended. Objections were received from 37 addresses. One response was received in support. The main comments are summarised below, the full letters are available to view online:

Comments	Officer response
Insufficient parking / increase in traffic	Parking provision is considered acceptable and the impact on the highway network is considered negligible. See section (e) the report which addresses parking and highway matters.
Overdevelopment of area	The development makes effective use of a brownfield site and contributes to housing need in Watford. See section (a) of this report which relates to the principal of a residential development.
Design and layout of proposal	The development is considered to respond well to the context. See section (b) of the report which considers the impact of the character and

	appearance of the development.
Loss of existing houses	The existing two houses are not subject to any protection which would justify their retention.
Overlooking / overshadowing / loss of light and loss of privacy.	The development would cause no significant harm to neighbouring amenity. See section (c) of the report which considers the living conditions of neighbouring properties.
Pressure on local services	The development is CIL (Community Infrastructure Levy) liable. This levy is used to help the local authority to deliver the infrastructure needed to support development in the area.
Housing Mix	The development does provides five, three bedroom units. See section (d) which considers housing mix.
Disruption from construction	The Environmental Protection Act, the Control of Pollution Act and the Highway Act also control the matters of disruption raised.
Bat activity on Site	A bat survey was undertaken which concludes the potential for bat roosting is low. See section (f) which considers this matter.

8 Recommendation

Conditions

1. Time Limit

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

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

2. Approved Drawings and Documents

The development hereby permitted shall be carried out in accordance with the following approved drawings and documents:

- 0169-KLA-00-XX-DR-18 001 P02
- 0169-KLA-00-XX-DR-18 002 P02
- 0169-KLA-00-GF-DR-19 001 P02
- 0169-KLA-00-01-DR-19 001 P02
- 0169-KLA-00-02-DR-19 001 P02

- 0169-KLA-00-RF-DR-19 001 P02
- 0169-KLA-00-20-DR-19 001 P02
- 0169-KLA-00-20-DR-19 002 P02
- 0169-KLA-00-20-DR-19 003 P02
- 0169-KLA-00-20-DR-19 004 P02
- 0169-KLA-00-30-DR-19 001 P02
- 0169-KLA-00-30-DR-19 002 P02
- 0169-KLA-00-XX-DR-18 003 P02
- 0169-KLA-00-XX-DR-18 004 P03
- 0169-KLA-00-GF-DR-10 001 P03
- 0169-KLA-00-01-DR-10 001 P03
- 0169-KLA-00-02-DR-10 001 P03
- 0169-KLA-00-RF-DR-10 001 P03
- 0169-KLA-00-20-DR-10 001 P02
- 0169-KLA-00-20-DR-10 002 P02
- 0169-KLA-00-20-DR-10 003 P02
- 0169-KLA-00-30-DR-10 001 P03
- 0169-KLA-00-30-DR-10 002 P03

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

3. Materials

No development shall commence above the level of the damp course until details of the materials to be used for all the external finishes of the development hereby approved, including external walls, roofs, porch, balconies, doors, windows, and rainwater goods, have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and samples.

Reason: To ensure that the proposed development applies high quality materials that makes a positive contribution to the character and appearance of the area, in accordance with Policies QD6.2 and QD6.4 of the Watford Local Plan 2022-2038.

4. Detailed Drawings

No development shall commence above the level of the damp course until detailed section drawings of the inset balconies, brick detailing, door and window reveals, cills, lintels and gable edges have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and samples.

Reason: To ensure that the proposed development applies high quality materials that makes a positive contribution to the character and appearance of the area, in accordance with Policies QD6.2 and QD6.4 of the Watford Local Plan 2022-2038.

5. Landscaping

The development hereby approved shall not be occupied until full details of both hard and soft landscaping works, based on the approved drawings, including:

- trees and soft landscaping to be planted (including location, species, density and planting size)
- materials for all pathways, parking spaces, and hard surfacing
- all boundary treatments

have been submitted to and approved in writing by the Local Planning Authority. The approved landscaping scheme, with the exception of the planting, shall be completed prior to any occupation of the development. The proposed planting shall be completed not later than the first available planting and seeding season after completion of the development. Any new trees or plants which within a period of five years, 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 visual appearance of the site and to ensure that enhancements to biodiversity are provided in accordance with paragraphs 8c), 174d) and 180d) of the Framework and Policy NE9.1 of the Watford Local Plan 2021-2038.

6. Highway Works

The dwellings hereby approved shall not be occupied until the modified access and egress arrangements from King Georges Avenue as shown in principle on the approved drawings have been completed in full.

Reason: In the interests of the safe operation of the site and the surrounding highway, in accordance with Policies ST11.4 and ST11.5 of the Local Plan.

7. Parking Spaces

The dwellings hereby approved shall not be occupied until the parking spaces have been laid out and constructed in accordance with the approved drawings. The parking spaces shall be retained at all times thereafter.

Reason: To ensure that adequate parking and manoeuvring space is provided for the future occupiers, in accordance with Policy ST11.5 of the Watford Local Plan 2021-2038.

8. Electric Vehicle Charging

The dwellings hereby approved shall not be occupied until one active electric vehicle charging point has been provided to each dwelling. The electric charging infrastructure shall be retained at all times thereafter.

Reason: To ensure that the proposed development achieves high levels of sustainability in accordance with Policy ST11.5 of the Watford Local Plan 2021-2038.

9. Cycle and Refuse Stores

The dwellings hereby approved shall not be occupied until details of both cycles stores and the refuse store have been submitted to and approved in writing by the Local Planning Authority and have been constructed in accordance with the approved drawings. The stores shall be retained as approved at all times.

Reason: To ensure adequate facilities are provided for the future occupiers, in accordance with Policies QD6.4 and ST11.4 of the Watford Local Plan 2021-2038.

10. Water Efficiency

The dwellings hereby approved shall not be occupied until details have been submitted to and approved in writing by the Local Planning Authority to confirm that the dwelling has been completed to meet the water efficiency optional requirement of 110 litres of water per person per day, as set out in the Building Regulations (2010) Approved Document G Requirement G2 and Regulation 36.

Reason: To minimise the impact of the development on the environment, in accordance with Policy CC8.3 of the Watford Local Plan 2021-2038.

11. Aerials and Satellite Dishes

The dwellings hereby approved shall not be occupied until details of any communal terrestrial television aerial(s) or satellite dish(es) have been submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of the character and appearance of the buildings, in accordance with Policy QD6.1 of the Local Plan.

12. Lighting

The dwellings hereby approved shall not be occupied until a detailed external lighting scheme for the development has been submitted to and approved in writing by the Local Planning Authority and the lighting scheme has been installed in accordance with the approved details.

Reason: In the interests of the visual appearance of the site, in accordance with Policy QD6.3 of the Local Plan.

13. M4(2) of the Building Regulations

The development hereby approved shall not be occupied until details have been submitted to and approved in writing by the Local Planning Authority to confirm that seven of the nine dwellings hereby approved have been built to the Building Regulations (2010) Access to and use of Buildings, Approved Document M (2015 as amended), Volume 1: Dwellings, M4 (2): Accessible and adaptable dwellings.

Reason: To provide accessible housing, in accordance with Policy HO3.10 of the Watford Local Plan 2021-2038.

14. Obscure Glazing

The stairwell windows on the south elevation above ground floor level shall be obscure glazed. The obscured glazing should be retained in perpetuity.

Reason: To protect the amenity of adjoining gardens on King Georges Avenue.

15. Communications Equipment

For the avoidance of doubt, no communications development permitted by Classes A, B or C of Part 16 of Schedule 2 of the Town and Country Planning

(General Permitted Development) (England) Order 2015 (as amended) shall be undertaken on any of the buildings hereby approved unless otherwise approved in writing by the Local Planning Authority.

Reason: In the interests of the character and appearance of the buildings, in accordance with Policy QD6.2 of the Local Plan.

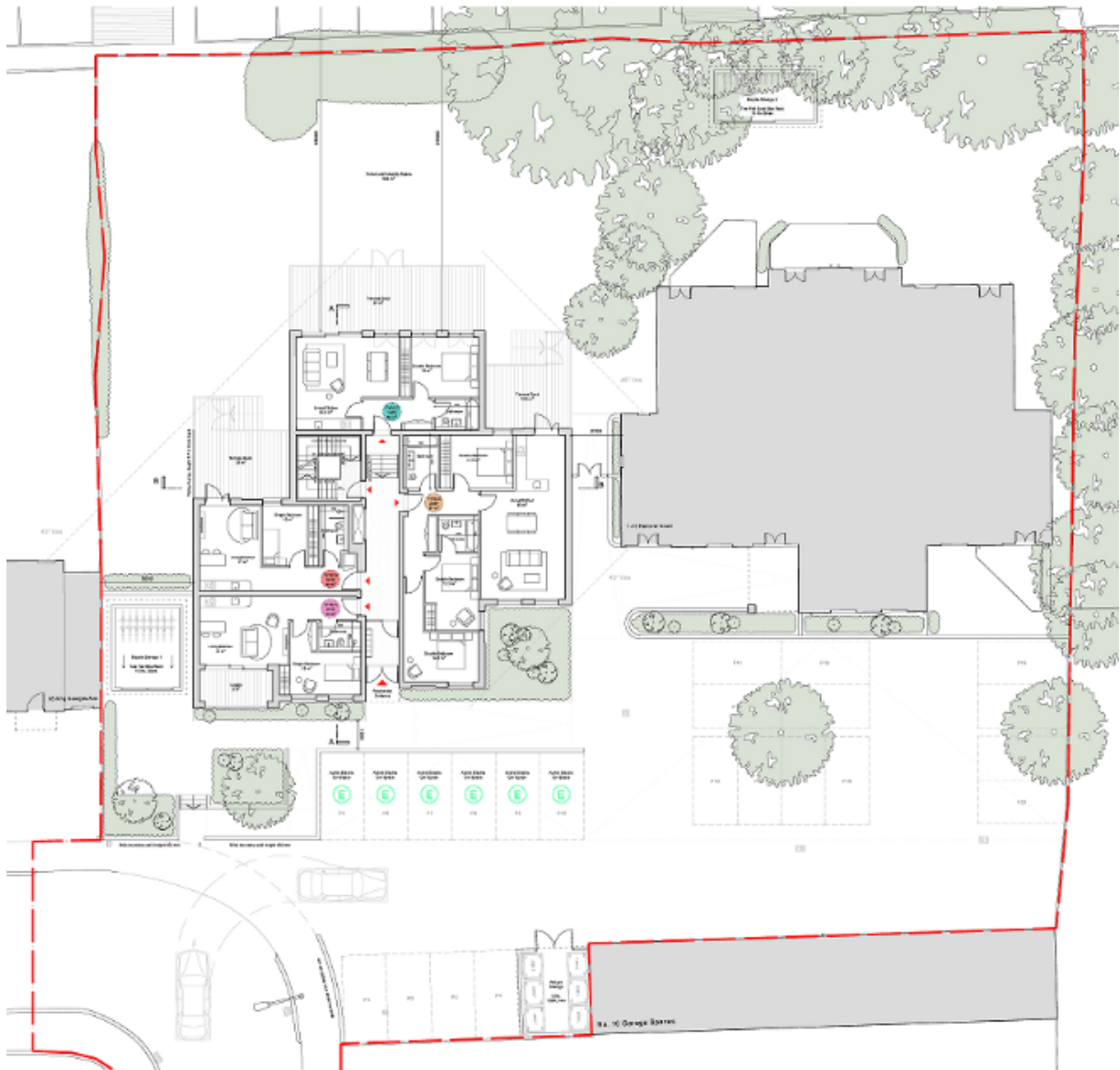
Informatives

1. IN907 – Positive and proactive statement
2. IN909 – Street naming and numbering
3. IN910 – Building Regulations
4. IN911 – Party Wall Act
5. IN912 – Hours of Construction
6. IN913 – Community Infrastructure Levy Liability
7. IN915 – Highway Works – HCC agreement required

Site Location Plan



Proposed Plan of Site showing proposed Ground Floor Plan



Proposed First Floor Plan



Proposed Second Floor Plan



Proposed East Elevation (front)



Proposed West Elevation (rear)



Proposed South Elevation (facing 95 King Georges Avenue)



Proposed North Elevation (facing Hanover Court)



CGI – Front elevation from South East



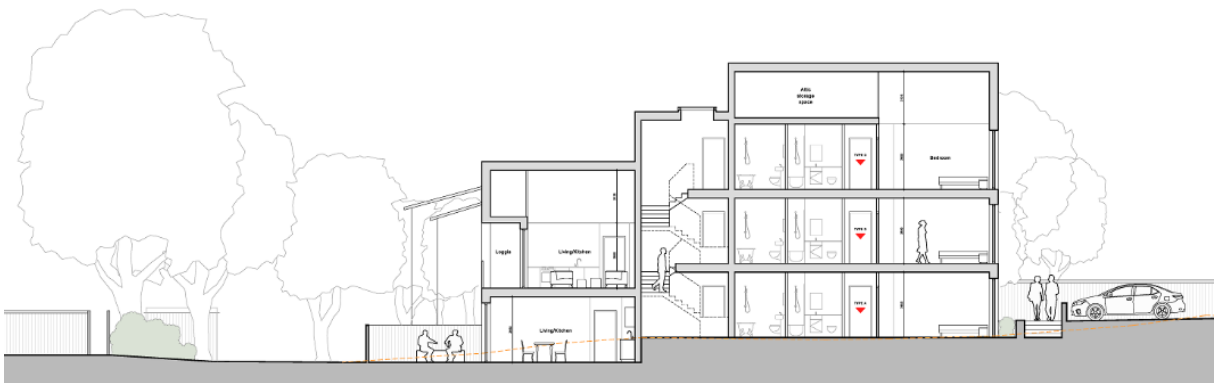
CGI – Front elevation from North East



CGI – Rear of building in surroundings



Proposed East to West Cross Section through site



Agenda Item 5

Committee date	Tuesday 6 December 2022
Application reference Site address	22/00866/FULM – 252-272 Lower High Street Watford WD17 2JJ
Proposal	Demolition of the existing building and hardstanding; and erection of 193 residential units, public realm and landscaping, parking and access, and all other associated works
Applicant	London Square
Agent	Planning Potential Ltd
Type of application	Full Planning Permission
Reason for committee item	Major Application
Target decision date	7 December 2022
Statutory publicity	Watford Observer, Site Notice and Neighbour Letters
Case officer	Chris Osgathorp chris.osgathorp@watford.gov.uk
Ward	Central

1. Recommendation

- 1.1 That planning permission be refused for the reasons set out in section 8 of this report.

2. Site and surroundings

- 2.1 The application site comprises the Glyn Hopkins car dealership located adjacent to the junction of Dalton Way and Lower High Street. It includes a showroom building and a large expanse of hard-surfacing for the display of vehicles.
- 2.2 There is a short street of residential and commercial properties immediately to the west of the site in Local Board Road, which includes Locally Listed buildings. Lower High Street consists of residential and commercial buildings of varied scale and appearance, including Locally Listed buildings to the east of the site at No. 253 and the Grade II* Listed Frogmore House to the south. Large format retail warehouses with substantial surface car parks are sited to the west and south.
- 2.3 There is a nearby telecommunications monopole and associated cabinets on the pavement in Dalton Way.
- 2.4 There are nearby bus stops in Dalton Way and Lower High Street, and Watford High Street Station is around 0.5km to the north – a walking time of about 5 minutes. National Cycle Route 6 runs along Dalton Way through to Local Board Road and Lower High Street. Having regard to the sustainable transport options and the range of shops of services available in the immediate vicinity,

this is considered to be an accessible location. Whilst the site itself is not within a Controlled Parking Zone, the properties to the north of are within Zone F.

- 2.5 The Environment Agency's Flood Map for Planning identifies the application site as being part within Zone 3a/Zone 2 in an area benefitting from flood defences. Furthermore, the site is within Source Protection Zone 1 – Inner Protection Zone, which is an area that requires additional protection from potential pollutants to safeguard drinking water abstraction sites. The application site has previously been used for potentially contaminative land uses.

3. Summary of the proposal

3.1 Proposal

- 3.2 The application proposes demolition of the car showroom building and hardstanding; and erection of 193 residential units, public realm and landscaping, parking and access, and other associated works.

- 3.3 The main building would be in a roughly L-shaped footprint with frontages facing Dalton Way and Lower High Street. A communal garden and parking area would be sited to the rear of the building and there would be a vehicular access from Lower High Street via an undercroft. 24 on-site parking spaces would be provided.

- 3.4 The main building would be of 9 storeys (including recessed top floor) at the corner facing the junction, and the wings on Dalton Way and Lower High Street would step down to a maximum of 7 storeys. There would be a lower 4 storey building adjacent to the junction with Local Board Road. A 'pocket park' would be sited between the main building and the lower building.

3.5 Conclusion

- 3.6 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The Watford Local Plan 2021-2038 (the Local Plan) was adopted on 17 October 2022 and post-dates the National Planning Policy Framework (the Framework). The policies of the Local Plan therefore carry substantial weight.

- 3.7 The proposed development is classified as a taller building and so Policy QD6.5 of the Local Plan is engaged. As discussed in the report, the proposed development would not deliver outstanding design in terms of its massing, detailing and site layout. Furthermore, the massing and siting of the proposal would not provide an appropriate relationship and transition to the

surrounding context – including the adjacent modest scale Locally Listed Buildings in Local Board Road, which would be overwhelmed and dominated by the proposed development.

- 3.8 The internal layout of the proposed development includes a significant proportion of single-aspect units with double-banked corridors, which restricts opportunities for passive ventilation and good levels of light and outlook. The layout fails to achieve outstanding design quality in terms of daylight, sunlight, privacy, noise mitigation and design measures to mitigate solar gain and overheating. The single-aspect ground floor units facing Dalton Way would be particularly oppressive for future occupiers. The layout would not provide high quality living conditions for future occupiers and is therefore contrary to Policies QD6.4, QD6.5 and CC8.3 of the Local Plan.
- 3.9 Furthermore, the proposal would not provide an appropriate transition in scale and siting to the neighbouring residential properties adjacent to the site. In this regard, it would cause an unacceptable loss of daylight and sunlight to No. 251 Lower High Street and a significant loss of privacy to residential properties in Local Board Road. It therefore conflicts with Policies QD6.5(g) and CDA2.3(d) of the Local Plan and guidance contained in paragraphs 7.3.10 – 7.3.20 of the Watford Residential Design Guide.
- 3.10 The application provides insufficient information regarding improvements to pedestrian, cycling and bus infrastructure. In the absence of a Section 106 Agreement to secure improvements, the proposal fails to meet the objectives in the Watford Local Plan 2021-2038 to encourage a modal shift and greener travel patterns. Moreover, the significant increase in pedestrian and cycle journeys arising from the proposed development and the absence of necessary new infrastructure to support those journeys would cause unacceptable risk to highway safety. The proposal therefore conflicts with Policies CDA2.3, SS1.1, ST11.1, ST11.3, ST11.6 and IN10.3 of the Local Plan.
- 3.11 The siting of Block E adjoining Local Board Road would represent an unacceptable safety risk to users of the public highway and footway networks. The adjoining pavement, at around 0.5m wide, is very narrow and the siting of the proposed building hard against the highway boundary would make this an unsuitable route for all pedestrians. The doors serving the bin store and residential entrance swing outwards across the adjoining highway, which would cause unacceptable risks to highway users. There is also potential for bins to be stored on the pavement on collection day, which, due to the narrowness of the pavement, would cause obstruction on the pavement to

the detriment of the safety of highway users. The proposed development is therefore contrary to Policies SS1.1, ST11.3 and ST11.6 of the Local Plan.

- 3.12 The proposed flood compensation scheme contained within the submitted Flood Risk Assessment (the FRA) fails to demonstrate that it will be able to provide adequate flood storage to mitigate the proposed development. The development is expected to impede flood flow and reduce flood storage capacity, thus causing a net loss in floodplain storage and increasing the risk of flooding to Lower High Street and the surrounding area. The Environment Agency has therefore objected to the scheme. Furthermore, the application contains insufficient information to demonstrate compliance with parts (a) and (b) of the Exception Test in paragraph 164 of the National Planning Policy Framework and there are inconsistencies between the FRA and the proposed plans. The proposal is therefore contrary to Policy NE9.4 of the Watford Local Plan 2021-2038 and Chapter 14 of the National Planning Policy Framework.
- 3.13 The application site is within Source Protection Zone 1 and located upon a principal aquifer. The Environment Agency and Affinity Water object on the basis that inadequate information has been supplied to demonstrate that risks posed to ground water can be satisfactorily mitigated. Furthermore, no information has been submitted to show whether piled foundations would result in physical disturbance to the principal aquifer or whether the risks associated with this can be managed. The proposal therefore conflicts with Policies CC8.5 and NE9.4 of the Local Plan.
- 3.14 The application has failed to adequately demonstrate the impact of the proposed development on surface water and foul water drainage infrastructure and so Thames Water has been unable to assess the proposal. Furthermore, the Lead Local Flood Authority has objected, amongst other reasons, due to insufficient information within the submitted drainage strategy and drainage design. Given the large scale of the proposed development and the location of the site in a Source Protection Zone and area at risk of flooding, it is considered that this is a matter that should be addressed at planning application stage rather than through planning conditions. The proposal is therefore contrary to Policies CC8.5, IN10.2, NE9.1, NE9.4 and NE9.5 of the Local Plan.
- 3.15 Whilst the submitted Energy Statement indicates a 60% reduction in carbon emissions over Part L, it states that gas boilers would be used in the development. The use of fossil fuels would undermine the sustainability credentials of the scheme and the Local Plan's objectives for the borough to become carbon neutral. Furthermore, the absence of passive ventilation

strategies and design measures to minimise the risks of overheating weakens the proposal's sustainability. It is acknowledged that the accessible location of the development and the car-lite parking provision provides opportunities for the use of sustainable modes of transport. Nevertheless, in the absence of a s106 Agreement, the application fails to make necessary contributions towards improvements to pedestrian, cycle and bus infrastructure in the surroundings. This includes improvements to the adjacent road junction of Dalton Way and Lower High Street. As such, the proposal would not provide significant sustainability benefits sought by Policy QD6.5 of the Local Plan.

- 3.16 The 2021 Housing Delivery Test results published 14 January 2022 show that the Council has a measurement of 48% of homes delivered against its requirement over the previous 3 years, which amounts to a substantial shortfall. The proposal would make efficient use of previously development land and the provision of 193 dwellings would make a significant contribution towards addressing the shortfall in housing. The development would be in an accessible location and accord with the Council's spatial strategy to make effective use of sustainable transport modes.
- 3.17 However, the social benefits of additional housing would be limited by the absence of any affordable housing. The proposal would bring temporary economic benefit from the construction process, and the long-term economic benefit from the boost to local services from the new residents. There would also be environmental benefits through additional soft landscaping, enhanced biodiversity and the removal of advertising hoardings. The provision of a pocket park would provide some social and environmental benefit, however this would be heavily overshadowed by the adjacent buildings, which would harm the quality of the space.
- 3.18 Policy QD6.5 sets out that proposal should clearly demonstrate significant public benefits that the development will provide, setting out why these would not be achievable as part of a development restricted to the base building height. The benefits set out above could be provided as part of a development restricted to base build height and, aside from increased housing numbers, it has not been clearly demonstrated what the additional benefits of a taller building are in this location. In this regard, the proposal is contrary to Policy QD6.5.
- 3.19 The benefits would be outweighed by the conflict with development plan policies and so the proposed development conflicts with the development plan as a whole. In accordance with paragraph 11d)i) of the National Planning Policy Framework, the application of policies relating to flood risk (footnote 7)

provide a clear reason for refusing the development. As such, the so called 'tilted balance' in paragraph 11 d)ii) of the Framework is not engaged. Consequently, there are no other considerations that outweigh the conflict with the development plan.

4. Relevant policies

4.1 Members should refer to the background papers attached to the agenda. These highlight the policy framework under which this application is determined. Specific policy considerations with regard to this particular application are detailed in section 6 below.

4.2 Paragraph 11 d) of the National Planning Policy Framework establishes the 'presumption in favour of sustainable development', which applies where a local planning authority cannot demonstrate a 5 year housing supply or has failed to deliver at least 75% of their housing requirement as part of the Housing Delivery Test. The Council scored below 75% in the most recent Housing Delivery Test results, therefore paragraph 11d) applies. This means granting planning permission unless:

- i. the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

5. Relevant site history/background information

5.1 21/01612/PREAP6 - Planning Performance Agreement for proposed redevelopment of the site to provide circa 210 residential units and associated access and landscaping.

The Council has issued 3 Advice Notes in relation to previous iterations of the scheme. The last was issued on 16 May 2022. Also, an iteration was considered at the Place Shaping Panel on 8 March 2022. A subsequent Chair's Review was not carried out. The Place Shaping Panel report is available to view in Appendix 1.

The Place Shaping Panel Report is summarised as follows:

- The designs do not yet demonstrate the outstanding design quality required to justify the proposed heights.

- Further consideration of the site plan is required to ensure that the development relates positively to anticipated developments in the area, for which it will set a benchmark.
- A clear typological approach should be resolved for the blocks which may lead to changes to massing.
- The 2 frontages on Dalton Way and Lower High Street should be treated differently in response to different conditions.
- More active frontage created on Lower High Street, including commercial if possible.
- Stronger corner design required for Block B.
- Quality of courtyard amenity space is questioned, which risks being overshadowed and dominated by hard-surfacing and vehicles.
- The public realm should do more to demonstrate significant public benefit.
- The development must develop a positive relationship with the adjoining Pump House Theatre, and opportunities to provide it with outdoor space and frontage should be discussed.
- The quality of residential units should be outstanding, but the proportion of single aspect units is too high and also questions the lack of true dual aspect properties.
- Further thinking required on the proximity of balconies.
- Options other than a plinth should be revisited to address flood risk, including duplex units on Dalton Way.
- The development must demonstrate significant environmental benefits, and a comprehensive sustainability plan is required to make this case.

In consideration of a subsequent iteration, the officers' Advice Note of 16 May raised concerns that various matters raised by the Place Shaping Panel have not been addressed. Comments were made that the proposal would be seen as one large mass of a building, which would appear bulky and monotonous. It would not achieve the outstanding design sought by Policy QD6.5. Concerns were raised about inactive frontages at ground floor and the quality of outdoor spaces. Furthermore, the scheme did not address the high proportion of single-aspect units, which can result in issues relating to cross-ventilation and quality of the residential accommodation. Issues relating to privacy, noise and pollution need to be addressed. It was noted that the scheme may need to resolve the close proximity of an existing telecommunications mast, which may need to be re-located to accommodate the development.

It was concluded that the quantum of development contributes to issues relating to townscape, place-making and quality of the living environment. The height of the building had not been justified having regard to taller building policy QD6.5.

6. Main considerations

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

- (a) Principle of residential development;
- (b) Whether the proposal would constitute outstanding design quality in terms of architecture, distinctiveness and its relationship to site context;
- (c) The effect of the proposed development on the setting of the Grade II* listed Frogmore House;
- (d) Whether the proposal would constitute outstanding design quality in terms of layout, with particular regard to the quality of the living environment;
- (e) Whether the proposal would provide an acceptable housing mix/tenure;
- (f) The effect of the proposal on the living conditions of neighbouring properties;
- (g) Access, parking and transport matters;
- (h) The effect of the proposal on flood risk;
- (i) Whether the risks posed by land contamination would be adequately mitigated;
- (j) Whether the proposal makes satisfactory provision for surface water and foul water drainage;
- (k) The effect of the nearby telecommunications equipment in Dalton Way;
- (l) Whether the proposal would provide significant public benefits which would not be achievable as part of a development restricted to base build height; and,
- (m) Whether the proposal would provide significant sustainability benefits.

6.2 (a) Principle of residential development

The application site is located within the Colne Valley Strategic Development Area (the Colne Valley SDA). Policy CDA2.3 of the Local Plan sets out strategic objectives for the wider area, and identifies that the Colne Valley SDA is

designated to facilitate transformative and co-ordinated change around the River Colne and Lower High Street Area, producing a sustainable and mixed-use urban quarter of high quality design and place making, excellent connectivity and a diverse range of uses.

- 6.3 Amongst other things, the Policy states that proposals will be expected to contribute towards the co-ordinated delivery of development, infrastructure and improvements to the public realm. Furthermore, in locations adjacent to existing residential areas, new development should be designed to minimise the potential impact on these areas by providing a transition in built form between the existing homes and higher-density development.
- 6.4 At a site-specific level, the application site forms Housing Allocation HS22 of the Local Plan, which identifies the site as suitable for residential development and outlines an indicative yield of 110 units. It states that development proposals should:
- (a) Support the wider objectives of the Colne Valley Strategic Development Area;
 - (b) Future development at HS22 will take into account the findings and recommendations of the Council's Heritage Impact Assessment;
 - (c) Future development must demonstrate that any negative impacts on the significance of the designated and non-designated heritage assets, and their setting, identified in the Heritage Impact Assessment have been avoided and if this is not possible, minimised through appropriate masterplan design;
 - (d) Specific mitigation measures will be identified through the preparation of a further detailed Heritage Impact Assessment for the site, to be submitted prior to the determination of any application;
 - (e) Ensure that the scheme is designed to minimise impacts on the low level residential dwellings located to the west of the site;
 - (f) Demonstrate that safe access has been provided on the site;
 - (g) Consider how the scheme contributes to the pedestrian and cyclist experience in the area and retain the footpaths adjacent;
 - (h) Be informed by a site specific Flood Risk Assessment and Surface Water Drainage Strategy as the site is in Flood Zone 2 and 3a, and is also subject to groundwater and surface water flood risk;
 - (i) Take account of the potential impact on water and wastewater infrastructure in conjunction with Thames Water, and make provision for upgrades where required due to the scale of the new dwellings to be provided; and
 - (j) Take account of the potential risk of contamination on site.

- 6.5 Figure 6.3 of the Local Plan identifies the Base Building Height in the Colne Valley SDA as being up to 6 storeys. The proposed development would be above this height and is therefore classified as a taller building. Policy QD6.5 of the Local Plan states that proposals for taller buildings should clearly demonstrate:
- a) Outstanding design quality, including height, massing, proportion, materials, detailing, site layout and its relationship with the surrounding area, which set it apart in terms of quality and distinctiveness, and which positively contribute towards the context and character of the area;
 - b) Significant public benefits that the development will provide, clearly setting out why these would not be achievable as part of a development restricted to the base building height;
 - c) Significant sustainability benefits including the building design, construction, operation and connections to the surrounding area;
 - d) A clear townscape rationale for the specific siting of taller buildings, marking key locations or nodes, and responding to public transport accessibility and activity;
 - e) A positive relationship with relevant heritage assets and their setting and the historic character that contributes to the town's distinctiveness;
 - f) A desire to achieve a specific skyline shape or cluster having regard to Skyline: Watford's Approach to Tall Buildings Supplementary Planning Document;
 - g) That proposals have been designed to avoid harmful impacts on daylight, sunlight, wind conditions, overheating and microclimate, including the provision of appropriate mitigation where required;
 - h) That appropriate amenity and play spaces are incorporated to a high standard for all residents;
 - i) That the setting of the development will not be dominated by car parking as a result of the higher density. In this context, a car-lite approach should be taken, where this would be an appropriate response to higher local public transport accessibility; and
 - j) A balanced and comprehensive approach to servicing to avoid impact on local streets and spaces.

6.6 The proposal would provide residential development on an allocated housing site and is therefore acceptable in principle. The main issues set out in the report draw upon the above matters identified in the Local Plan.

6.7 (b) Whether the proposal would constitute outstanding design quality in terms of architecture, distinctiveness and its relationship to site context

The buildings to the north/west of the application site in Local Board Road and Lower High Street display variation in scale and appearance, and are typically of 2 or 3 storeys. There are exceptions to this, including the 4 storey block of flats at Crosfield Court. The residential/commercial buildings on the western side of Lower High Street – identified in pink on page 19 of the Design & Access Statement – have a fairly tight urban grain of buildings on modest plots, which gives a strong and legible character to the street scene. Large format retail warehouses with substantial surface car parks are sited to the west and south – as identified in blue on page 19 of the D & A Statement. This form of development has resulted in a much looser grain with poor definition to the street frontages and a car-dominated environment.

6.8 The redevelopment of the application site presents an opportunity to improve the street structure at a prominent location and provide a more active and legible route towards the town centre. In doing so, development should respect and respond to the surrounding context. There is also an opportunity to improve the public realm and replace the existing large areas of hardstanding with soft landscaping.

6.9 The main block of the proposed development would be in an L-shaped footprint with residential frontages facing Dalton Way and Lower High Street. The general principle of this footprint is acceptable because it enables a stronger streetscape to be provided with a quieter communal garden rear. Nevertheless, the scale and appearance of the proposed development and its effect on the townscape is considered in more detail below.

6.10 The main building would be of 9 storeys at the corner facing the junction, and the wings on Dalton Way and Lower High Street would step down to a maximum of 7 storeys. There would be a lower 4 storey building adjacent to the junction with Local Board Road. This includes a recessed top floor for the main building and the lower block. A ‘pocket park’ would be sited between the main building and the lower building.

6.11 The elevations of the main block are articulated through projecting bays that include balconies to the sides. The recessed top floor in contrasting dark brick is proposed as a means to break down the massing of the building. The Design & Access Statement explains that the detailing of the Lower High Street

elevation has sought to take some cues from the surrounding context through the use of red brickwork, white horizontal banding and cills, and metalwork to the balconies. It sets out that the vertical piers provides a more formal, civic façade. The Dalton Way elevation adopts a similar approach, however the external walls are finished in buff brickwork and the horizontal banding is less perceptible. The D & A Statement comments that this elevation has a less formal and softer character. The lower block adjacent to Local Board Road would employ a similar approach, albeit at a smaller scale and without projecting bays.

- 6.12 Whilst the architecture has sought to break down the massing through projecting bays and a recessed top floor, it is considered that the main block would appear overly bulky. A taller element on the corner adjacent to the road junction could be an acceptable approach to enable wayfinding and act as a nodal point at this busy intersection. Nevertheless, the tallest element of the building along Lower High Street would have a particularly boxy form due to the lack of step down in height. The massing and proposed materials would create a heavy and monolithic presence in Lower High Street. Furthermore, although the detailing has sought to reflect the horizontal banding and brick detailing of other buildings in the vicinity, this approach on such a large building results in a horizontal emphasis which draws attention to the significant bulk of the building. As such, it is not considered that the arrangement of massing and use of materials provides a building of outstanding design quality.
- 6.13 The Place Shaping Panel suggested that a decision on the development typology could involve either breaking the massing down further in smaller buildings, or connecting individual buildings to form a single perimeter block. The proposal does not respond satisfactorily to this advice as it would have the appearance of a substantial building, which would not have sufficient visual interest through variation in form and detailing. In this way, the elevations would appear rather monotonous and would not provide an adequate response to the finer grain development to the north/west.
- 6.14 There would be a pinch point to the northern end of the main block, which arises due to the tapering of the site and the significant depth of the proposed building. At this point, the corners of the building would be very close to Lower High Street and the boundary with the properties in Local Board Road. This creates a cramped feel and an uncomfortable relationship to Lower High Street. From the north, the considerable depth of the building would be conspicuous and this would give a sense of the substantial scale and bulk of

the proposed development and its incongruous relationship to the surrounding context.

- 6.15 The main block would come close to the modest scale Locally Listed Buildings in Local Board Road at a substantially greater scale, which would overwhelm and dominate the neighbouring buildings. Also, the 4 storey scale of the lower block would jar with the more modest scale and proportions of the Locally Listed buildings, and its siting hard against the narrow pavement would be overbearing in Local Board Road and result in an unduly prominent relationship to the Locally Listed buildings. The massing and siting of the proposal therefore would not provide an appropriate relationship and transition to the surrounding context.
- 6.16 The ground floor on Dalton Way would be raised 1.3m above pavement level as a means to mitigate the risk of flooding. This would result in the ground floor windows being at a high level above a plinth and so at pedestrian level, the frontage is defensive and does not promote activity. There would also only be one residential entrance on this elevation and a long section of blank wall which further undermines the activity of the elevation. Whilst it is acknowledged that this is a challenging site due to its location close to busy main roads and an area at risk of flooding, the poor relationship to the pedestrian environment is an additional negative aspect of the proposal that weighs against the scheme. It is not considered that alternative options for the approach to the ground floor have been fully explored, including commercial or community uses. Furthermore, limited information of the public realm on this frontage has been provided and so the quality has not been fully demonstrated.
- 6.17 Regarding the outdoor space to the rear of the building, whilst the proposal has sought to use landscaping measures to mitigate the impact of the parking area, the large proportion of space given over to the parking and manoeuvring would nevertheless undermine the quality of the external space. The Place Shaping Panel raised concerns that the courtyard would be dominated by parking and it is not considered that this matter has been resolved.
- 6.18 For the above reasons, the proposed development fails to achieve outstanding design quality in terms of architecture, distinctiveness and its relationship to site context. The proposal therefore conflicts with Policy QD6.5 of the Watford Local Plan.
- 6.19 (c) The effect of the proposal on the setting of Frogmore House

In considering proposals for planning permission, the duty imposed by section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1980

requires that special regard must be had to the desirability of preserving the setting of listed buildings. Paragraph 193 of the Framework states that “great weight should be given to the [designated heritage] asset’s conservation”.

- 6.20 Frogmore House is a Grade II* listed building, which was constructed in 1716 in the early Georgian period. The building is of 3 storeys constructed in red brick, and has a hipped plain tile roof behind a parapet. The Official Listing notes that the building has a four window range to the road, and a formal 5 window south front. The windows are 19th Century sash windows. The road front has moulded wood eaves cornice, blank openings to the left bay of the ground floor and 2 left bays above. The Official Listing notes that the building has a fine doorcase with fluted pilasters on panels set against a channelled rusticated surround. The northern elevation consists of a rendered wall.
- 6.21 The submitted Heritage Assessment notes that Frogmore House has a high level of architectural significance and was designed in a restrained classical style with balanced proportions typical of the early Georgian period. This is agreed. It is evident that the main architectural interest of the building relates to the southern elevation and the western road-facing elevation as this provides the main visual and decorative interest. The northern elevation provides less interest as it consists of a rendered wall and the windows are of different size and style, and do not reflect the strong order of typical Georgian architecture. The building was subject to restoration works, which were granted consent in November 2017 under Ref. 17/00594/LBC. This included works to the building and improvements to landscaping and boundary treatment within its setting.
- 6.22 The setting of the building has changed significantly since its original construction and is urban in character – including large retail warehouses and busy main roads. The application site forms part of this urban setting. Having regard to the siting of Frogmore House in the streetscape, it is considered that its significance is most understood from within the walled garden and in short-range views in Dalton Way and Lower High Street. This is particularly so in views from the south, where the architectural composition of the building can be appreciated.
- 6.23 The proposed development would be most noticeable in the setting of Frogmore House in views from the south in Lower High Street, where the tallest element of the building would represent a nodal feature and signpost the route towards the town centre. The proposal would be of a significantly greater scale than the listed building, however it is not considered that it would appear dominant or overbearing in the setting due to its location on

the opposite side of a busy road intersection. Whilst the proposal would not represent outstanding design quality, it sits within the existing urban setting and would not unduly compete with the listed building in views from the south or harm the appreciation of the significance of the building.

- 6.24 The proposed development may restrict some views of the listed building from the north in Lower High Street, however this relates to the rendered northern elevation of the listed building, which is considered to be of less significance. In this respect, it is not considered that the proposal would be harmful to the setting of the listed building.
- 6.25 For the above reasons, the proposed development would preserve the setting of the Grade II* Listed Frogmore House. The proposal therefore complies with Policy HE7.1 and HE7.2 of the Local Plan.
- 6.26 (d) Whether the proposal would constitute outstanding design quality in terms of layout, including living environment and public realm

The proposed floor plans demonstrate general compliance with the Technical Housing Standards – Nationally Described Space Standard (the NDSS) in terms of the gross internal floor areas, built-in storage and bedroom sizes. Furthermore, the cross-section drawings show that the flats would have a minimum floor to ceiling height of at least 2.4m, which accords with the NDSS. There are some labelling errors on the plans – for example on drawing Nos. D2101_CD Rev 02 and D2105_CD Rev 02, flats D.1.5, D.1.6, D.5.5 and D.5.6 are incorrectly labelled as 2 bed 4 person units when they are in fact 1 bed 2 person flats. However, this is not material to the assessment of the layout.

- 6.27 The internal layout includes a significant proportion of single-aspect units (30%) with double-banked corridors, which restricts opportunities for passive ventilation and good levels of light and outlook. Furthermore, most of the units indicated as being dual-aspect are not considered to be true dual-aspect units as side windows are created through small steps in the frontage. This was a point that was referenced by the Place Shaping Panel. There is little information to demonstrate that this would provide benefits of cross-ventilation associated with true dual-aspects properties. The submitted Daylight & Sunlight Assessment¹ shows that many flats would receive inadequate levels of daylight and sunlight, which appears to be partly due to the significant proportion of single-aspect units and the deep and narrow layout of some of the flats.

¹ Prepared by Anstey Horne Ref: RC/EK/ROL00623 Dated May 2022

- 6.28 The Daylight & Sunlight Assessment has been carried out using the widely recognised methodology in the Building Research Establishment Guidance² (the BRE Guidance). It indicates that only 63% of the living/kitchen/dining rooms achieve the 2% guide for Average Daylight Factor (ADF) – a means of testing daylighting to habitable rooms. Furthermore, 13.9% would not even achieve 1.5% ADF. Moreover, the Daylight & Sunlight Assessment shows that only 258 of the 493 habitable rooms (52%) face within 90 degrees of due south. Of the windows that do face within 90 degrees of due south, only 75% receive the BRE Guidance for annual probable sunlight hours (APSH). These results are not indicative of an outstanding layout.
- 6.29 Furthermore, the proximity of the windows and balconies within the recessed bays on the front elevations would result in close inter-visibility between the proposed flats, which would compromise privacy for future occupiers.
- 6.30 Paragraph 150 of the National Design Guide states that well-designed buildings make the most of passive design strategies to minimise overheating and achieve internal comfort. These include: the layout and aspect of internal spaces; insulation of the external envelope and thermal mass; management of solar gain; and good ventilation to reduce overheating. They are supported by other measures where necessary, such as mechanical ventilation. Paragraph 8.14 of the Local Plan highlights that smart design, such as dual aspect windows, passive ventilation and the incorporation of cooling measures are important to prevent overheating and avoid health risks. Use of traditional, energy dependent, cooling systems is not appropriate.
- 6.31 The application does not adequately demonstrate how it has made the most of passive design strategies to minimise overheating. In particular, the development includes a large proportion of single-aspect units, which limits the opportunities for cross-ventilation. The south-west facing single-aspect units would be particularly susceptible to overheating and represents poor layout. The Energy Statement says that all noise affected units in Dalton Way and Lower High Street would have MVHR mechanical ventilation. Reliance on mechanical ventilation for a large proportion of the units in the development is not considered to constitute outstanding design. Furthermore, there is little information regarding the management of solar gain – for example solar shading that keeps summer sun out but lets the winter sun shine into the building, or use of different window sizes and designs.
- 6.32 The Environmental Health department has raised concerns regarding the contents of the submitted Noise Assessment, which amongst other things,

² Site Layout Planning for Daylight and Sunlight: A guide to good practice (Second Edition, 2011)

includes the survey methodology, modelling and lack of information on property design features to mitigate noise (aside from standard measures such as glazing specifications). Development proposals should separate new noise-sensitive development from major noise sources (including roads) through good layout and design (including use of distance, screening, orientation, uses and materials) rather than sole reliance on sound insulation.

- 6.33 It is not considered that single-aspect ground floor units close to busy main roads constitutes outstanding design and little justification or mitigation has been provided. It is noted that the ground floor units would be raised, however this would not provide adequate mitigation. Furthermore, whilst it is noted that high glazing performance could provide some attenuation, residents would have a reasonable expectation to be able to open windows and the subsequent exposure to high noise levels is unacceptable.
- 6.34 Furthermore, there would be poor quality outlook from the single-aspect ground floor units close to main roads. The lack of an outlook towards a private, landscaped space would undermine the quality of these units. As such, the combined effect of the single-aspect layout, outlook onto busy roads and impacts of noise would result in oppressive living conditions for residents. In this regard, the proposal has not addressed the comments of the Place Shaping Panel.
- 6.35 The nearby Pump House theatre in Local Board Road is a potential source of noise due to performances and outdoor functions. This may be particularly noticeable in the evenings due to quieter background noise levels. The Noise Assessment fails to consider the impact of noise from the Pump House theatre on the proposed residential units and any attenuation measures that may be required.
- 6.36 The habitable windows of the ground floor unit labelled E.G.1 in Block E would adjoin the site boundaries, including the narrow pavement in Local Board Road. This is a cramped layout and would result in substandard privacy and outlook for future residents. Furthermore, there would be little defensible space for the habitable windows serving unit E.G.2 adjacent to the pocket park.
- 6.37 The Daylight and Sunlight assessment shows that a large proportion of the new 'pocket park' would experience significant overshadowing, which would undermine the quality and attractiveness of this space. This is due to the enclosure of the space by existing and proposed buildings and its siting directly to the north of the main block.

6.38 Taken in the round, the above factors indicate that the layout of the proposed development would fail to achieve high quality living conditions for future occupiers and therefore would not demonstrate outstanding design, as sought by Policy QD6.5 of the emerging Local Plan.

6.39 (e) Housing mix/tenure

The application shows that 39% of the proposed units would be 1-bed; 53% 2-bed; and 8% 3-bed. The 3-bed allocation falls short of the minimum provision of 20% for family-sized units as set out in Policy HO3.2 of the Local Plan.

Nevertheless, pre-application discussions were undertaken regarding this site some time before the adoption of the Local Plan and officers had indicated that a similar housing mix would be acceptable. At the time of pre-application discussions, it was not certain that the Local Plan Inspector would find the 20% provision for family units to be sound. In these circumstances, it is not considered reasonable to object to the proposed housing mix.

6.40 A financial viability appraisal (FVA) was submitted with the application, which sets out that the proposed development has a deficit of £7,223,238 against a benchmark land value of £4,290,000 with no affordable units. The Council requested to see a copy of the existing lease for the car showroom to verify the rental value of £235,000 indicated in the FVA, however the applicant declined to provide this on the basis that it is confidential information. This is not considered to be an acceptable response and so the benchmark land value is not agreed. As such, it has not been demonstrated that the proposal cannot viably provide affordable housing in accordance with the provision and tenure mix set out in Policy HO3.3 of the Local Plan, and a s106 Agreement has not been completed to include a late-stage review mechanism – contrary to Policy HO3.3.

6.41 On 27 October the applicant subsequently e-mailed a formal offer of 90 affordable rented units (46% of total units) at a discounted rent of 66.4% of market value to be secured by a s106 Agreement. The Housing department advise that a mix of affordable rented and shared ownership does not meet the Borough's housing needs. This is because Affordable Rents are not affordable for the majority of households on the housing register – due to high market values. Policy HO3.3 of the Local Plan states that 60% of affordable units should be social rented and seek to prioritise family-sized accommodation – this is to meet the housing needs of the community. The affordable housing offer conflicts with the tenure mix in Policy HO3.3. Furthermore, a s106 Agreement has not been completed to secure the

affordable rented units and so this consideration provides no weight in favour of the proposal.

6.42 (f) Living conditions of neighbouring properties

The BRE Guidance says that diffuse daylighting of the existing building may be adversely affected if i) the Vertical Sky Component (VSC) measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value [the VSC test]; or ii) the area of the working plane in a room which will have a direct view of the sky is reduced to less than 0.8 times its former value [the Daylight Distribution test]. The 0.8 figure effectively means a reduction in daylight of 20% or more.

6.43 The VSC test results in the Daylight & Sunlight assessment show a noticeable loss of daylight to 3 habitable windows at Nos. 1, 2 and 4a Local Board Road. Furthermore, there would be a noticeable reduction in daylight distribution to 4 habitable rooms at Nos 2, 3 and 4a. Of greatest concern is the effect of the proposal on the first floor flat at 251 Lower High Street, which would experience significant reductions in both daylight and sunlight.

6.44 The VSC test shows that only 2 of the 8 windows at No. 251 Lower High Street adhere to BRE Guidance. The non-conforming bedroom and living room windows have VSC values ranging between 8.05% and 18.95% and retain 0.37 to 0.54 times their former value. This amounts to a substantial reduction in the level of daylight received by the windows.

6.45 Regarding daylight distribution, only 1 (the kitchen) of the 4 rooms assessed adhere to the BRE Guidance. The non-conforming rooms retain between 0.41 and 0.58 their former value, and have visible sky access to at least 40% of the room areas. The living room retains visible sky to 48% of the room area.

6.46 In respect of sunlight, the BRE Guidance sets out that if a main living room window faces within 90 degrees of due south, sunlighting may be adversely affected if the centre of the window: i) receives less than 25% of annual probable sunlight hours (APSH), or less than 5% of APSH between 21 September and 21 March, and ii) receives less than 0.8 times its former sunlight hours during either period, and iii) has a reduction in sunlight received over the whole year greater than 4% of annual probably sunlight hours.

6.47 The assessed rooms at No. 251 are all below the BRE Guidance for both annual and winter APSH. For annual APSH, the rooms have absolute values ranging between 16% and 24% and retain between 0.38 and 0.46 times their former values. For winter APSH, the rooms have values ranging between 0%

and 3% and retain between 0 and 0.18 times their former value. The reduction for all windows would also be greater than 4% of APSH. In particular, the living room would have a reduction in winter APSH from 17% as existing to just 3% as proposed.

- 6.48 The Daylight & Sunlight Assessment justifies the results on the basis that they are representative of levels that one may consider appropriate to set as an alternative target value in this location which is identified as a strategic development area. It also refers to a comparison with an alternative 6 storey massing. However, no information regarding the alternative massing is shown. The Daylight and Sunlight Report indicates that the results would not be significantly worse than a 6 storey alternative, however it would nevertheless cause an additional impact. Furthermore, the Base Build Height in the Colne Valley area is up to 6 storeys and so an appropriate height will depend on various factors, including the effect on surrounding properties. As such, 6 storeys is not the starting point.
- 6.49 It is accepted that it is a matter of planning judgement as to whether the loss of daylight and sunlight is acceptable. Whilst redevelopment of the site to provide higher density development may have some impact on the neighbouring windows, it is considered that the results are unacceptably poor and is indicative of the scheme failing to respect the surrounding context. This matter therefore weighs against the scheme.
- 6.50 Several habitable windows in the south-western elevation of the main block would be within 11m of the boundary with the properties in Local Board Road, which conflicts with the guidance in Section 7.3.16 of the Watford Residential Design Guide. This would result in unacceptable overlooking of neighbouring gardens. There would also be overlooking from the balconies of the northernmost flats of the main block into the gardens.
- 6.51 The windows are also within the 27.5m privacy arc measured from the neighbouring rear windows (see Section 7.3.16 of the RDG), which would cause overlooking of habitable rooms to the detriment of the privacy of neighbouring occupiers.
- 6.52 The windows in the side elevation of the lower block facing Local Board Road would need to be obscure glass and fixed closed below 1.7m in order to protect the privacy of No .1 Local Board Road. The balconies of this block would cause direct overlooking into the neighbouring garden given their close proximity to the boundary and elevated position.
- 6.53 For the above reasons, the proposal would cause an unacceptable loss of daylight and sunlight to No. 251 Lower High Street and a significant loss of

privacy to neighbouring residential properties in Local Board Road. It therefore conflicts with Policies QD6.5(g) and CDA2.3(d) of the Watford Local Plan.

6.54 (g) Access, parking and transport matters

Strategic Policy SS1.1 of the Local Plan states that proposals will contribute towards a modal shift, greener travel patterns and minimising the impact on the environment. Pedestrian, cycling and passenger transport will be prioritised. Policy QD6.5 (j) states that the setting of the development should not be dominated by car parking as a result of the higher density. In this context, a car-lite approach should be taken, where this would be an appropriate response to higher local public transport accessibility. Policy ST11.3 states that in the Colne Valley SDA, developments should expect that their transport needs are met primarily by sustainable transport objectives, and as such should be car-lite. Lower High Street should serve primarily as a sustainable travel corridor, with high quality direct pedestrian access from sites. The provision of an internal travel network that is highly permeable to those who wish to walk or cycle, with direct, high quality links and low traffic streets should be ensured.

6.55 Due to the accessible location of the application site within the Colne Valley SDA, a car-lite approach should be taken. In accordance with the objectives in the Local Plan to encourage a modal shift, the development should support journeys by walking, cycling or passenger transport rather than by car. Given the dominance of the on-site parking area, as discussed above, a further reduction in on-site parking spaces would be encouraged.

6.56 Whilst the site itself is not within a Controlled Parking Zone, the properties to the north of are within Zone F. This restricts parking to permit holders only Monday – Saturday 8am – 6.30pm plus 6pm – 10pm Weekday Matches and 1pm – 6.30pm Sunday Matches. Future occupants of the proposed development would not be entitled to permits within Zone F, and the restriction hours would make it impractical to own a car and park in surrounding residential streets. Furthermore, Dalton Way, Lower High Street and Waterfields Way are principal roads with parking restrictions through double yellow lines. As such, having regard to the existing parking restrictions in the vicinity and the significant distance to streets with un-restricted parking, it is not considered that the proposed development would generate significant overspill parking in surrounding area. The limited parking availability would provide opportunities for the use of sustainable transport modes and support the objectives in the Local Plan.

- 6.57 Given the Local Plan objectives to encourage a modal shift towards sustainable transport patterns, and the expected uplift in pedestrian and cycle movements – as shown in the Transport Assessment, it is necessary that infrastructure is improved to support these journeys. In this regard, the Highway Authority notes that the Lower High Street/Dalton Way junction is convoluted for pedestrians due to the numerous guardrails and crossing stages not falling on desire lines to local facilities. For cycles, the current southbound cycle bypass layout is outdated and provides priority to vehicles. The layout is unsuitable for all types of cycle and intimidates cycle users due to potential conflicts between cycles/vehicles and pedestrians. The Highway Authority comments that the junction has therefore been identified as a severe risk following the anticipated increases in pedestrian and cycle trips and the proximity of the site to the junction.
- 6.58 As such, improvement works to be carried out by the applicant under s278 works or a financial contribution are necessary – which would go towards Safety Scheme 2 identified in Section 7.2 of the draft Infrastructure Delivery Plan January 2021. In the absence of a s106 Agreement to secure improvements to the junction, the proposal would have an unacceptable impact on highway safety and conflict with the sustainable transport objectives in the Local Plan.
- 6.59 The Highway Authority comments that the proposed site access and Local Board Road bellmouth need to be redesigned to provide pedestrian and cycle priority. This should be in the form of a continuous footway/cycleway crossover or a Copenhagen Crossing. Furthermore, the Highway Authority states that in order to provide a safe and suitable access for cycles, whilst avoiding conflicts with pedestrians, a cycle route should be provided around the front of the building and designed in line with the widths and materials contained in LTN 1/20 Cycle Infrastructure Design³. This sets out a minimum width of 3m for shared use routes.
- 6.60 The proposed ground floor plan indicates new paved surfacing and trees to the Dalton Way and Lower High Street pavements. Nevertheless, there is limited information in the Transport Assessment regarding the design of these public realm works. Furthermore, there are few details to assess the potential pinch points, including the obstruction caused by the existing telecommunications equipment. Some sections of the route – particularly along Dalton Way – are less than 3m wide, which could cause conflicts between pedestrians and cyclists and make use of the route less comfortable.

³ Local Transport Note 1/20 published by the Department for Transport July 2020.

The Highway Authority also requests that the trees along Lower High Street should be re-sited closer to the highway to increase the area of cycling.

- 6.61 Regarding bus infrastructure, the Highway Authority notes that the closest southbound bus stop to the site is on Lower High Street. Currently, no real time information boards are provided and so to encourage bus trips a financial contribution is sought to provide a real time information board.
- 6.62 The contents of the applicant's Travel Plan are noted, however due to the insufficient information regarding improvements to pedestrian, cycling and bus infrastructure, and the absence of a Section 106 Agreement to secure improvements, the proposal fails to meet the objectives in the Local Plan to encourage a modal shift and greener travel patterns. Moreover, the increase in pedestrian and cycle journeys arising from the development and the absence of appropriate infrastructure to support those journeys would cause unacceptable risk to highway safety. The proposed development is therefore contrary to Policies SS1.1, ST11.3 and ST11.6 of the Local Plan.
- 6.63 The Highways Authority comments that Block E is too close to Local Board Road and represents severe safety risks to users of the public highway and footway networks. The adjoining pavement, at around 0.5m wide, is very narrow and the siting of the proposed building hard against the highway boundary would make this an unsuitable route for all pedestrians. For these reasons, the layout of the proposal pays little regard to the quality of pedestrian infrastructure. Furthermore, the doors serving the bin store and residential entrance swing outwards across the adjoining highway, which would cause unacceptable risks to highway users. There is also potential for bins to be stored on the pavement on collection day, which, due to the narrowness of the pavement, would cause obstruction on the pavement to the detriment of the safety of highway users. The proposed development is therefore contrary to Policies SS1.1, ST11.3 and ST11.6 of the Local Plan.
- 6.64 Vehicular access to the site would be from Lower High Street. There would be 9 parking spaces in the undercroft area and 15 parking spaces on the hard-surfacing in the rear courtyard, which includes 10 disabled parking spaces. Refuse stores would be accessed from the rear of the building. The submitted Operational Waste Management Strategy sets out that refuse collection vehicles would approach the site from the north and enter in forward gear. Bins would be collected from the rear parking area, and collection vehicles would turn within the site and exit the site in forward gear. The Highway Authority has raised no concerns regarding the turning diagrams for a 10m rigid vehicle. Nevertheless, officers are concerned that the large gates within

the undercroft are indicated to open outwards, which could prevent collection vehicles pulling fully off the highway while gates are opened and therefore lead to obstruction. This is a matter that would need to be addressed through a planning condition.

- 6.65 The submitted Delivery and Servicing Plan sets out that delivery vehicles would access the site in the same way. Amongst other things, it states that delivery lockers will be provided within building lobbies for residents' parcels to be delivered to, which will reduce the loading time for deliveries to the development and subsequently reduce the on-site space requirements for delivery and servicing. The outline details are considered to be acceptable, however, a detailed Delivery and Servicing Plan should be secured through a s106 Agreement.
- 6.66 The submitted Car Parking Management Plan (the CPMP) sets out that 80% of parking spaces would have active charging infrastructure with passive provision for all other spaces. This exceeds the minimum provision set out in the Local Plan. Furthermore, it states that engagement with a local car club operator has been undertaken and a letter of intent has been received confirming that one car club space will be provided on site from the outset and a second can be provided in the future should demand increase. The developer will provide one year's free membership to residents to encourage the uptake of the on-site car club. The CPMP outlines proposed parking management measures, including leasing parking spaces on a short-term basis to maximise the efficiency of the car park, and proposed parking enforcement measures. A detailed CPMP, to include details of the operation and management of the car club amongst other things, should be secured through a s106 Agreement.
- 6.67 For the above reasons, the proposed development would have an unacceptable impact on highway safety and it fails to make satisfactory provision for necessary enhancements to pedestrian, cycling and passenger transport infrastructure. The proposal therefore conflicts with Policies SS1.1, ST11.3 and ST11.6 of the Local Plan.

6.68 (h) Flood risk

The application site is located within Flood Zones 3a and 2. The Sequential Test set out in the Framework and Policy NE9.4 of the Local Plan does not need to be applied because the site is allocated for housing in the Local Plan. There are no other sites in the Borough that are sequentially preferable. Nevertheless, the Exception Test is required because the proposal includes a

more vulnerable use in Flood Zone 3a and relevant aspects of the proposal had not been considered at plan-making stage.

- 6.69 Paragraph 164 of the Framework states that to pass the Exception Test it should be demonstrated that:
- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
 - b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
- 6.70 The FRA states that “Part (a) of the Exception Test is to be carried out by the Planning Consultant”, nevertheless the application contains no specific assessment to demonstrate that the development would provide wider sustainability benefits to the community that outweigh the flood risk. Whilst significant weight is attached to the benefits of additional housing, the sustainability benefits to the community are undermined through the absence of affordable housing and the lack of improvements to pedestrian, cycle and bus infrastructure in the vicinity of the site. Furthermore, as discussed below, the Environment Agency states that the proposal would increase the risk of flooding to the Lower High Street Area and the surrounding community. The proposal therefore does not pass the Exception Test in paragraph 164a) of the Framework.
- 6.71 The Environment Agency has objected to the proposal on the basis that the proposed flood compensation scheme does not demonstrate that it will be able to provide adequate flood storage to mitigate the proposed development. The scheme has not been shown to be hydraulically and hydrologically connected to the area of floodplain which will be lost as a result of the proposed development. As a result, the development is expected to impede flood flow and reduce flood storage capacity, thus causing a net loss in floodplain storage and increasing the risk of flooding to Lower High Street and the surrounding area. This is contrary to Paragraph 167 of the Framework, which states that “when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere”.
- 6.72 As discussed in the Environment Agency’s consultation response, the FRA contains inaccuracies in that it does not use most recent data. Furthermore, the FRA says throughout that ‘more vulnerable’ residential development would be located at first floor and above, which is not reflected by the proposed plans. Paragraph 167(b) of the Framework states proposals should demonstrate that “the development is appropriately flood resistant and

resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment”. Furthermore, it states that “safe access and escape routes are included where appropriate, as part of an agreed emergency plan”. The FRA contains few details to show that the development is designed to be flood resistant and resilient and no emergency plan has been submitted. It is not considered appropriate to address these matters through planning conditions. The proposal therefore fails to pass the Exception Test in paragraph 164b) of the Framework and is contrary to Policy NE9.4 of the Local Plan.

6.73 (i) Land contamination

The application site is within Source Protection Zone 1 and located upon a principal aquifer. The Environment Agency and Affinity Water object on the basis that inadequate information has been supplied to demonstrate that risks posed to ground water can be satisfactorily mitigated. Furthermore, no information has been submitted to show whether piled foundations would result in physical disturbance to the principal aquifer or whether the risks associated with this can be managed. The proposal is therefore contrary to Policies CC8.5 and NE9.4 of the Local Plan.

6.74 (j) Surface water and foul water drainage

The application has failed to adequately demonstrate the impact of the proposed development on surface water and foul water drainage infrastructure and so Thames Water have been unable to assess the proposal. Furthermore, the Lead Local Flood Authority has objected due to insufficient information within the submitted drainage strategy and drainage design. Given the large scale of the proposed development and the location of the site in a Source Protection Zone and area at risk of flooding, it is considered that this is a matter that should be addressed at planning application stage rather than through planning conditions. The proposal is therefore contrary to Policies IN10.2, NE9.1 and NE9.5 of the Local Plan. Amongst other things, these policies require proposals to demonstrate that there is, or will be, sufficient infrastructure capacity to support and meet all the requirements arising from the proposed development.

6.75 (k) Telecommunications equipment

Some of the proposed flats would be very close to an existing telecommunications mast on Dalton Way. Advice was provided at pre-application stage that the size and proximity of the proposed building has the potential to affect the operation of the adjacent telecommunications equipment, which needs to be given consideration. The roof of the proposed

building could potentially be an appropriate alternative location should one be required. The Planning Statement comments that this matter is under review.

6.76 (l) Whether the proposal would provide significant public benefits which would not be achievable as part of a development restricted to base build height

The provision of 193 dwellings in an accessible location would make a significant contribution towards addressing the shortfall in housing and accord with the Council's spatial strategy to make effective use of sustainable transport modes. However, the benefits of additional housing would be limited by the absence of a policy compliant provision of affordable housing. The proposal would bring temporary economic benefit from the construction process, and the long-term economic benefit from the boost to local services from the new residents. There would also be benefits through additional soft landscaping, the removal of advertising hoardings and greater structure to the street scene. Nevertheless, the townscape benefits would be negated by the shortcomings set out in section (b) above. The provision of a pocket part is acknowledged, however this would be heavily overshadowed by the adjacent buildings, which would limit this benefit.

6.77 Policy QD6.5 sets out that proposal should clearly demonstrate significant public benefits that the development will provide, setting out why these would not be achievable as part of a development restricted to the base building height. The benefits set out above could be provided as part of a development restricted to base build height and, aside from increased housing numbers, it has not been clearly demonstrated what the additional benefits of a taller building are in this location.

6.78 (m) Whether the proposal would provide significant sustainability benefits

Whilst the submitted Energy Statement indicates a 60% reduction in carbon emissions over Part L, it states that gas boilers would be used in the development. The use of fossil fuels would undermine the sustainability credentials of the scheme and the Local Plan's objectives for the borough to become carbon neutral. Furthermore, the absence of passive ventilation strategies and design measures to minimise the risks of overheating weakens the proposal's sustainability. It is acknowledged that the accessible location of the development and the car-lite parking provision provides opportunities for the use of sustainable modes of transport. Nevertheless, the application fails to make necessary improvements to pedestrian, cycle and bus infrastructure

in the surroundings. As such, the proposal would not provide significant sustainability benefits sought by Policy QD6.5 of the Local Plan.

7. Consultation responses received

7.1 Consultees

Consultee	Comment Summary	Officer response
Highway Authority	Objection. Refer to paragraphs 6.57 – 6.63 of the report.	Noted.
Environment Agency	Objection. Refer to paragraphs 6.71-6.73 of the report.	Noted.
Affinity Water	Objection. Refer to paragraph 6.73 of the report.	Noted.
Hertfordshire County Council Lead Local Flood Authority.	Objection. Refer to paragraph 6.74 of the report.	Noted.
Environmental Health	Objection. Refer to paragraphs 6.32-6.33 of the report.	Noted.
Thames Water	Insufficient information to demonstrate the impact of the proposed development on surface water and foul water drainage infrastructure.	Noted.
Housing	<p>Significant need for social rented units. Absence of affordable housing is disappointing. Viability review should be scrutinised.</p> <p>Regarding the subsequent offer of 90 affordable rented units at a discounted rent of 66.4% of market value, this would not be affordable for the</p>	Noted.

	majority of households on the housing register. 60% of the affordable housing should be social rented in accordance with the Local Plan.	
Arboricultural Officer	Objection on the basis of lack of Arboricultural Impact Assessment.	<p>The closest trees to the site are to the west in the adjacent retail park (which are not protected). These are separated from the site by a tarmac public footpath.</p> <p>Given the protection provided by the footpath, it is not considered that the proposal would harm the roots of the trees. Furthermore, no works would be required to the trees to accommodate the development. Consequently, it is not considered that a reason for refusal based on the absence of an Arboricultural Impact Assessment could be justified.</p>
Hertfordshire County Council Infrastructure & Growth Unit	No objection.	Noted.
Hertfordshire County Council Minerals & Waste	A Site Waste Management Plan should be submitted.	This could be secured through the imposition of a planning condition.
Waste & Recycling Service	No objection.	Noted.
Hertfordshire County Council Lead Local Flood Authority	No response.	Noted.

Contaminated Land Officer	Suggested standard contaminated land condition and a condition to require the submission of a Construction Management Plan.	Noted.
Health & Safety Executive	No objection.	Noted.

7.2 Interested parties

Letters were sent to 106 properties in the surrounding area. A notice was posted outside the site on 15 July 2022 and a notice was published in the Watford Observer on 15 July 2022. 17 letters of objection and 3 representations were received. The main comments are summarised below, the full letters are available to view online:

Objection comment	Officer comments
<p>The development is not in keeping with the local architecture, substantially higher and will ruin the aesthetic of Lower High Street.</p> <p>Far too large in scale for the area. Not in keeping with the lower rise, locally listed buildings in the vicinity.</p> <p>Massing and scaling of the buildings would be overbearing and completely out of character with the current and historic, low-rise nature of Lower High Street. Six or seven storeys rising sheer from the pavement is overpowering and out of scale.</p> <p>Overwhelming in comparison to the surrounding buildings and will dwarf the Locally Listed buildings in Local Board Road.</p> <p>The proposals bears no resemblance to the Locally Listed Georgian buildings or the Victorian design of the Locally listed buildings on Local Board Road.</p>	<p>This is considered in paragraphs 6.7 – 6.18 of the report.</p>

<p>The development does not seem to adhere to the current building line on Lower High Street, Dalton Way or in the case of Block E, both the building line of Lower High Street and the building line of Local Board Road – particularly in respect of the set back Locally Listed building that shares the development’s boundary, 1A Local Board Road.</p>	
<p>No. 251 Lower High Street will be massively impacted by a reduction in natural light from this excessive sized block. This piece of land is too small for the number of flats that might be built.</p>	<p>This is considered in paragraphs 6.44-6.49 of the report.</p>
<p>Buildings up to 8 storeys will have an impact on light for the residents and users of Local Board Road. In addition, going up to 8 storeys, with balconies and the 4 storeys of Block E, will have an impact on the privacy for the users and residents of Local Board Road.</p>	<p>These matters are considered in the ‘living conditions of neighbouring properties’ section of the report.</p>
<p>If the development goes ahead the number of cars approaching the Lower High Street/Dalton Way junction from the ring road will significantly increase and add to existing congestion.</p> <p>The likelihood of a build up of traffic within the site, wishing to turn right will represent a danger to residents and also increase air pollution close to the site buildings.</p> <p>Residents and visitors will feel encouraged to make the (illegal) left turn from Dalton Way to Lower High Street, rather than drive the correct route to get to the site parking. The scheme should be amended to make the vehicular access from Dalton Way rather than Lower High Street.</p>	<p>The Transport Assessment demonstrates that the proposal would result in a reduction in trip generation compared to the existing use.</p> <p>The number of vehicle movements from the site would be low during the AM and PM peak periods and so there would be unlikely to be a build up of traffic within the site.</p> <p>Enforcement of traffic regulations is a police matter.</p>

<p>Watford Borough Council's Infrastructure Delivery Plan identifies the junction for potential safety improvements (Safety Scheme 2: Waterfields Way/Lower High Street). It states there will be a 'Revised junction layout to improve visibility of signals and all road users (including the relocated signals and traffic islands, and improved signage and road markings)'.</p> <p>Monies should be secured as part of the development under a Section 278 to carry out these improvements, importantly the total lack of connectivity east/west between Waterfields Way and Dalton Way means an unsafe unregulated crossing in Lower High Street beyond the current guard rails.</p> <p>This development gives the opportunity to secure pedestrian and cycling improvements and so far the developer has not proposed that. This was raised with them twice and not included in their Public Consultation report.</p>	<p>This is considered in paragraphs 6.57 – 6.58 of the report.</p>
<p>In heavy downpours, the Lower High Street floods and excess water running on to the Glyn Hopkin site.</p> <p>The proposal does not alleviate the area's tendency to flash flood.</p>	<p>This is considered in paragraph 6.74 of the report.</p>
<p>Whilst the Flood Risk Assessment explains how the ground floor level has been raised to protect residents, there is no information as to how all residents may be offered a dry means of escape to safety in the event of a flood. Other than a reference at paragraph 4.2.3 which states that a Flood Evacuation Management Plan will be required.</p> <p>Some matters may be made the subject of planning conditions. Other matters which go to the heart of the proposal have to be addressed before planning permission is</p>	<p>This is considered in paragraph 6.72 of the report.</p>

<p>given. And this includes designing how all residents can have a dry means of escape from their homes given the depth of flood water forecast by the applicant's consultants may be from 0.49 to 0.75m deep. This is a matter which needs resolving before the grant of permission as advised by the NPPF and Planning Practice Guidance.</p>	
<p>Block E is being built over the start and access to the foul water and sewage run that serves Local Board Road, Pump House and beyond. It is also over one of Watford's main storm drains. There is no reference to the intention to build over in any of the application documents.</p>	<p>This is a matter that would need to be agreed by Thames Water.</p>
<p>There is no information to show how 193 extra dwellings will be able to share the Victorian sewage system in this part of Watford with the existing properties.</p>	<p>This is considered in paragraph 6.74 of the report.</p>
<p>The Acoustic Assessment takes no account of the 'agent of change' paragraph 187 of the National Planning Policy Framework. The 5 locations at which noise measurements were taken do not include taking measurements on the mutual boundary with 5 and 6 Local Board Road.</p> <p>The rearmost part of these buildings include a flat floored performance area for music etc as licenced by the Council, and a scenery workshop/store which operates on occasions 7 days a week up to 2359 hours depending on the needs of the forthcoming production. Also, the rear car park is used occasionally to host outdoor events besides car parking up to 2359 each day.</p> <p>The trustees look to the Council to ensure that the provisions of NPPF para 187 are taken into account. Further evidence is needed to assess the noise generation from the Pump House from midday to 2359 each</p>	<p>This is considered in paragraph 6.35 of the report.</p>

day, and what attenuation needs to be built into the development.	
The Pump House theatre will be the nearest cultural provider and is at capacity. It will be for the Council to determine if this additional impact means a contribution should be made to the Pump House to part fund the recently given planning permission, or funding should be provided from the Community Infrastructure Levy for this strategic facility.	Noted.
Inadequate parking provision would place further pressure on an already heavily congested part of the town.	This is considered in paragraphs 6.54-6.56 of the report.
Strain on local resources. Schools and GP practices being particularly affected.	The development is liable for Community Infrastructure Levy contributions, which would go towards the provision or improvement of local infrastructure.
Noise and pollution that the proposal would cause.	The proposed residential use would not cause a material increase in noise compared to the existing use. The submitted Air Quality Assessment shows that the proposal would not cause a material increase in pollution compared to the existing use.
Disturbance during construction works.	A condition could be imposed on any grant of planning permission to require the submission of a Construction Environmental Management Plan for approval. Whilst this could not completely prevent disturbance, the plan should include measures to mitigate the impacts as far as possible

	– for example, by limiting hours of construction, measures to limit dust etc.
The proposal does not include any affordable housing.	Noted.

8. Recommendation

That planning permission be refused for the following reasons:

1. The proposed development fails to achieve outstanding design quality in terms of its massing, detailing, siting and relationship to the surrounding context. In these respects, the proposal would not contribute positively towards the character of the area and therefore it conflicts with Policy QD6.5 of the Watford Local Plan 2021-2038.
2. The internal layout of the proposed development includes a significant proportion of single-aspect units with double-banked corridors, which restricts opportunities for passive ventilation and good levels of light and outlook. The layout fails to achieve outstanding design quality in terms of daylight, sunlight, privacy, noise mitigation and design measures to mitigate solar gain and overheating. The single-aspect ground floor units facing Dalton Way would be particularly oppressive for future occupiers. The layout would not provide high quality living conditions for future occupiers and is therefore contrary to Policies QD6.4, QD6.5 and CC8.3 of the Watford Local Plan 2021-2038.
3. The application fails to demonstrate to the satisfaction of the Local Planning Authority that the proposed development cannot viably provide affordable housing in accordance with the provision and tenure mix set out in Policy HO3.3 of the Watford Local Plan 2021-2038.
4. The proposed development would not provide an appropriate transition in scale and siting to the neighbouring residential properties adjacent to the site. In this regard, it would cause an unacceptable loss of daylight and sunlight to No. 251 Lower High Street and a significant loss of privacy to residential properties in Local Board Road. It therefore conflicts with Policies QD6.5(g) and CDA2.3(d) of the Watford Local Plan 2021-2038 and guidance contained in paragraphs 7.3.10 – 7.3.20 of the Watford Residential Design Guide.

5. The application provides insufficient information regarding improvements to pedestrian, cycling and bus infrastructure. In the absence of clear designs of works being undertaken on the footway which borders the site, cycleways including the National Cycle Network Route 6, or of a Section 106 Agreement to secure improvements, the proposal fails to meet the objectives in the Watford Local Plan 2021-2038 to encourage a modal shift and greener travel patterns. Moreover, the significant increase in pedestrian and cycle journeys arising from the proposed development and the absence of necessary new infrastructure to support those journeys would cause unacceptable risk to highway, footway and cycleway safety and operation. The proposed development is therefore contrary to Policies CDA2.3, SS1.1, ST11.1, ST11.3, ST11.6 and IN10.3 of the Watford Local Plan 2021-2038.
6. The siting of Block E adjoining Local Board Road would represent an unacceptable safety risk to users of the public highway and footway networks. The adjoining pavement, at around 0.5m wide, is very narrow and the siting of the proposed building hard against the highway boundary would make this an unsuitable route for all pedestrians. The doors serving the bin store and residential entrance swing outwards across the adjoining highway, which would cause unacceptable risks to highway users. There is also potential for bins to be stored on the pavement on collection day, which, due to the narrowness of the pavement, would cause obstruction on the pavement to the detriment of the safety of highway users. The proposed development is therefore contrary to Policies SS1.1, ST11.3 and ST11.6 of the Watford Local Plan 2021-2038.
7. The proposed flood compensation scheme contained within the submitted Flood Risk Assessment (the FRA) fails to demonstrate that it will be able to provide adequate flood storage to mitigate the proposed development. The development is expected to impede flood flow and reduce flood storage capacity, thus causing a net loss in floodplain storage and increasing the risk of flooding to Lower High Street and the surrounding area. The Environment Agency has therefore objected to the scheme. Furthermore, the application contains insufficient information to demonstrate compliance with parts (a) and (b) of the Exception Test in paragraph 164 of the National Planning Policy Framework and there are inconsistencies between the FRA and the proposed plans. The proposal is therefore contrary to Policy NE9.4 of the Watford Local Plan 2021-2038 and Chapter 14 of the National Planning Policy Framework.

8. The application site is within Source Protection Zone 1 and located upon a principal aquifer. The Environment Agency and Affinity Water object on the basis that inadequate information has been supplied to demonstrate that risks posed to ground water can be satisfactorily mitigated. Furthermore, no information has been submitted to show whether piled foundations would result in physical disturbance to the principal aquifer or whether the risks associated with this can be managed. The proposal is therefore contrary to Policies CC8.5 and NE9.4 of the Watford Local Plan 2021-2038.

9. The application fails to demonstrate the impact of the proposed development on surface water and foul water drainage infrastructure. Furthermore, the Lead Local Flood Authority has objected due to insufficient information within the submitted drainage strategy and drainage design. The proposal is therefore contrary to Policies CC8.5, IN10.2, NE9.1, NE9.4 and NE9.5 of the Watford Local Plan 2021-2038. Amongst other things, these policies require proposals to demonstrate that there is, or will be, sufficient infrastructure capacity to support and meet all the requirements arising from the proposed development, and incorporate well-designed Sustainable Drainage Systems that are appropriately integrated into the scheme.



Watford Place Shaping Panel

Report of Formal Review Meeting: Glyn Hopkins site

Tuesday 8 March 2022

Video conference

Panel

Peter Bishop (chair)

Joanne Cave

Jessica Reynolds

Linda Thiel

Alex Wraight

Attendees

Paul Baxter	Watford Borough Council
Andrew Clarke	Watford Borough Council
Sian Finney-MacDonald	Watford Borough Council
Chris Osgathorp	Watford Borough Council
Alice Reade	Watford Borough Council
Ben Martin	Watford Borough Council
Tom Bolton	Frame Projects
Reema Kaur	Frame Projects
Miranda Kimball	Frame Projects m

Apologies / report copied to

Louise Barrett	Watford Borough Council
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Confidentiality

This is a pre-application review, and therefore confidential. As a public organisation Watford Borough Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

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1. Project name and site address

Glyn Hopkin site, 252-272 Lower High Street, Watford, WD17 2JJ

2. Presenting team

Edwin Dudding	Formation Architects
Marco Tomasi	Formation Architects
Alex Parrett	London Square
Richard Rossetti	London Square
Mark Cooper	MCA Landscaping
Milena Lipska	Velocity
Paul Galgey	Planning Potential
Kate Paxton	Hodkinson

3. Planning authority briefing

The site comprises the Glyn Hopkin car dealership, which includes a showroom building and a large hard-surfaced forecourt. The site measures approximately 0.49 hectares in area and is located adjacent to the junction of Dalton Way and Lower High Street. To the north-west of the site lies Local Board Road and the locally listed buildings at Numbers 1a, 1, 2, 3 and the Pump House Theatre. There is another locally listed building to the east at 253 Lower High Street. Frogmore House, a Grade II* listed building, is located nearby to the south on Lower High Street. There are large retail warehouses nearby to the south and east.

The site forms part of the Colne Valley Strategic Development Area in the Final Draft Watford Local Plan 2018-2036 (the emerging Local Plan), and has been identified as suitable for residential development with an indicative yield of 110 units. The Local Plan includes a policy which states that proposals for taller buildings (over 8 storeys in this area) should clearly demonstrate features including outstanding design quality and significant public and sustainability benefits. The proposal is for a residential development with two 7-storey longer blocks (A and C) either side of a more prominent 9-storey central block (B). There is also a smaller, separate 3-storey block (D) in the north-east corner of the site.

Watford officers asked the panel for its views in particular on the height of the development, and whether it promises to deliver outstanding design quality; the way the development sits in the townscape, and whether their townscape rationale is clear; massing, and whether there is sufficient verticality to break up bulk; the impact on surrounding heritage assets, especially the Grade II* Frogmore House; the quality of residential accommodation, including the accessibility of ground floor units; the proportion of dual aspect units; and the quality of the rear courtyard amenity space.



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4. Place Shaping Panel's views

Summary

The panel appreciates the design development carried out to date, but considers that further work is needed to ensure the development makes as positive a contribution as possible to its setting. The panel considers that the designs do not yet demonstrate the outstanding design quality required to justify the proposed heights. It asks for further consideration of the site plan, to ensure the development relates positively to anticipated developments in the area, for which it will set a benchmark. A clear typological approach should be resolved for the blocks which may lead to changes to the massing. The two frontages on Dalton Way and Lower High Street should be treated differently in response to different conditions, including potential variation in materiality. More active frontage created on Lower High Street, including commercial space if at all possible, and a stronger corner design developed for Block B. Cycle storage in the south-western corner of Block A should be replaced with a triple aspect apartment. The panel questions the quality of the courtyard amenity space, which risks being overshadowed and dominated by hard surfacing and vehicles. It asks for a varied space that offers more to residents. The vehicle entrance requires refinement, and parking spaces should be removed from outside Block D. The public realm should do more to demonstrate significant public benefit. On Dalton Way, spaces must be safe and well-maintained, while on Lower High Street trees are not appropriate, but more public space could be introduced. The development must develop a positive relationship with the adjoining Pump House Theatre, and opportunities to provide it with outdoor space and frontage should be discussed. The quality of residential units should also be outstanding, but the panel considers the proportion of single aspect units to be too high and also questions the lack of true dual aspect units. It asks for further thinking on the proximity of balconies. It asks that options other than plinth are revisited to address flood risk, including duplex flats on Dalton Way. The development must also demonstrate significant environmental benefits, and a comprehensive sustainability plan is required to make this case. These comments are expanded below.

Site context

- The panel recognises the challenges of design a residential development on a site in a hostile setting. However, as the first in the Colne Valley Strategic Development Area, the site is particularly significant and will set a benchmark for design quality. It is therefore important that a strong urban design narrative is developed to support the proposals. T
- It is not yet clear how the design team will respond to the townscape expected to develop around the site. The setting is expected to change significantly as other developments come forward, and a clearer concept is needed to show how this project will take a lead in establishing the quality and characteristics of this new, emerging place.
- The panel encourages the team to consider its proposals in a wider context, including as part of the emerging Local Plan, and to spend time anticipating



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what is likely to happen on surrounding sites. such as the Tesco's store, opposite.

Heights and massing

- The panel considers the overall approach to massing to be promising, successfully breaking down the bulk of the blocks. However, it asks that more views are provided showing the development in a wider context to understand its impact in views from distance. A stronger case is needed for the buildings of the heights proposed, including an assessment of how they contribute to the quality of anticipated future settings.
- The panel also suggests that greater clarity is needed on the form of the development. At the moment, it combines elements of mansion, courtyard and perimeter blocks and perimeter blocks. A clearer concept of the typology being created will help to identify relevant precedents. For example, there are very good European precedents for the way courtyard blocks can address corners, such as the chamfered corners of blocks in central Barcelona.
- A decision on the development typology could involve either breaking the massing down further in smaller buildings, or connecting individual buildings to form a single perimeter block. Different massing options should also be tested to assess their carbon impacts.
- It will also help to suggest solutions to the way the development relates to its surroundings. For example, the way mansion blocks meet the street at ground level can inform the relationship between flats and both Dalton Way and Lower High Street.

Architecture

- The panel notes that nearly double the number of units are proposed than indicated by the emerging local plan. This increased density and added height will require a strong justification through the delivery of buildings with outstanding design quality. While the panel appreciates the work carried out to develop the design, it does not yet consider the architecture to be outstanding.
- The panel suggests that more thought is given to the treatment of frontages, to provide a different presence on Dalton Way and Lower High Street. Options could include using different materials to give blocks their own colours.
- The materiality could also differ at ground floor level, for example, on Lower High Street, or around block entrances to help create a more specific response to settings.
- The panel also considers that treatment of Block B, on the corner, should aim to provide a marker on the journey along Lower High Street towards central Watford. A more distinctive architectural response is needed to this important



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location. Exploring a crown to the building could help to create a stronger sense of place and contribute to way-finding.

- A strong commitment to achieving outstanding design quality is needed from the applicant. The planning application should leave no doubt about the level of ambition for the development, nor the commitment to delivering design detail and overall quality.

Dalton Way and Lower High Street frontages

- The panel considers that different design responses are needed to Dalton Way and to Lower High Street. While the dual carriageway will not change in the foreseeable future, a sympathetic approach is needed to the Lower High Street frontage to enable and progress change along this route.
- This should include considering realigning Block D to locate its frontage on Lower High Street, reinforcing the importance of this route rather than Lower Board Street.
- The panel understands that commercial uses are not considered viable on the site. However, it feels to not providing any ground floor commercial space would be a missed opportunity to strengthen active frontage on Lower High Street and, potentially, to connect to future phases of development in the strategic development area.

Public realm

- The delivery of public benefit to help justify the height of the development should include the delivery of public realm around the buildings. For example, the panel suggests a pocket of public space could be provided off Lower High Street, echoing courts in previous buildings on the site.
- The panel notes the importance of designing landscaping on Dalton Way in detail, to ensure it contributes positively to a traffic-dominated setting. The indented areas of frontage must be carefully designed so they do not trap rubbish, and a maintenance plan will be needed. It is also important that these spaces feel safe, and do not provide hiding places.
- The panel also asks for more thinking on where tree planting should be focused. While large trees will make a difference to quality of apartments along Dalton Way, they are not traditionally a part of Lower High Street and may not be appropriate for this frontage.

Amenity space

- The panel is concerned that the courtyard will be dominated by parking and bicycles and could feel like a street, rather than providing a welcoming amenity space for residents. It suggests revisiting designs to explore whether cars and bicycles can be located elsewhere, freeing space for residents.



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- The panel also considers more work is needed to refine the vehicle entrance on Lower High Street, which seems unnecessarily wide and lacks character. It should be designed to contribute positively to the public realm.
- Removing the two parking spaces from the north side of Block D would help to improve the quality of the entrance, as well as allowing dual aspect units to be introduced.
- This could allow a more varied approach to be taken to courtyard landscaping. For example, swales could be included to make creative use of rainwater, and landscape design used to generate further benefit.
- The panel also asks for further assurances that the courtyard microclimate will be comfortable. If it is to provide high quality amenity space, it will require more than the suggested minimum of two hours of sunlight, and it is also important to understand the impact of wind levels below a 6-storey building.
- The development offers an important opportunity to make a connection to the Pump House Arts Centre, immediately to the rear of the site. The applicants should hold discussions with the arts centre to consider how they can create public benefit by improving its setting. The courtyard amenity space could spill over to connect with the arts centre, providing outdoor space that is currently lacking. Block D could potentially include frontage to create a presence for the arts centre on Lower High Street.

Internal layout

- The panel considers the inclusion of through cores to be a positive move, helping to activate the rear of the building as well as the front.
- The panel notes that 27 per cent of units are single aspect, which does not demonstrate the outstanding design quality required. It is also concerned that there is a lack of true dual aspect units designed to provide cross-ventilation as well as views.
- The panel also suggests that the inclusion of balconies that are orientated towards one another may need to be reconsidered, as it will create problems with both overlooking and proximity.
- The panel is concerned that raising the building on a plinth to manage flood risk will be expensive, and asks that other strategies are considered, including the introduction of duplexes.
- It is also not convinced that the plinth provides a suitable solution to privacy concerns. While bedrooms should not be at ground level next to Dalton Way, other rooms could be located on the street, as they are in many cities.



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- The panel has concerns about the quality of units facing busy roads, especially corner units in Block B overlooking the junction between Lower High Street, Dalton Way and Waterfields Way. Traffic will generate both noise and pollution, especially at ground floor level. The panel asks for further thinking to ensure a high quality living environment for all residents.
- The panel also suggests that the southernmost corner of Block A would provide a good location for a triple aspect residential unit, and that the cycle storage should be moved to allow this.

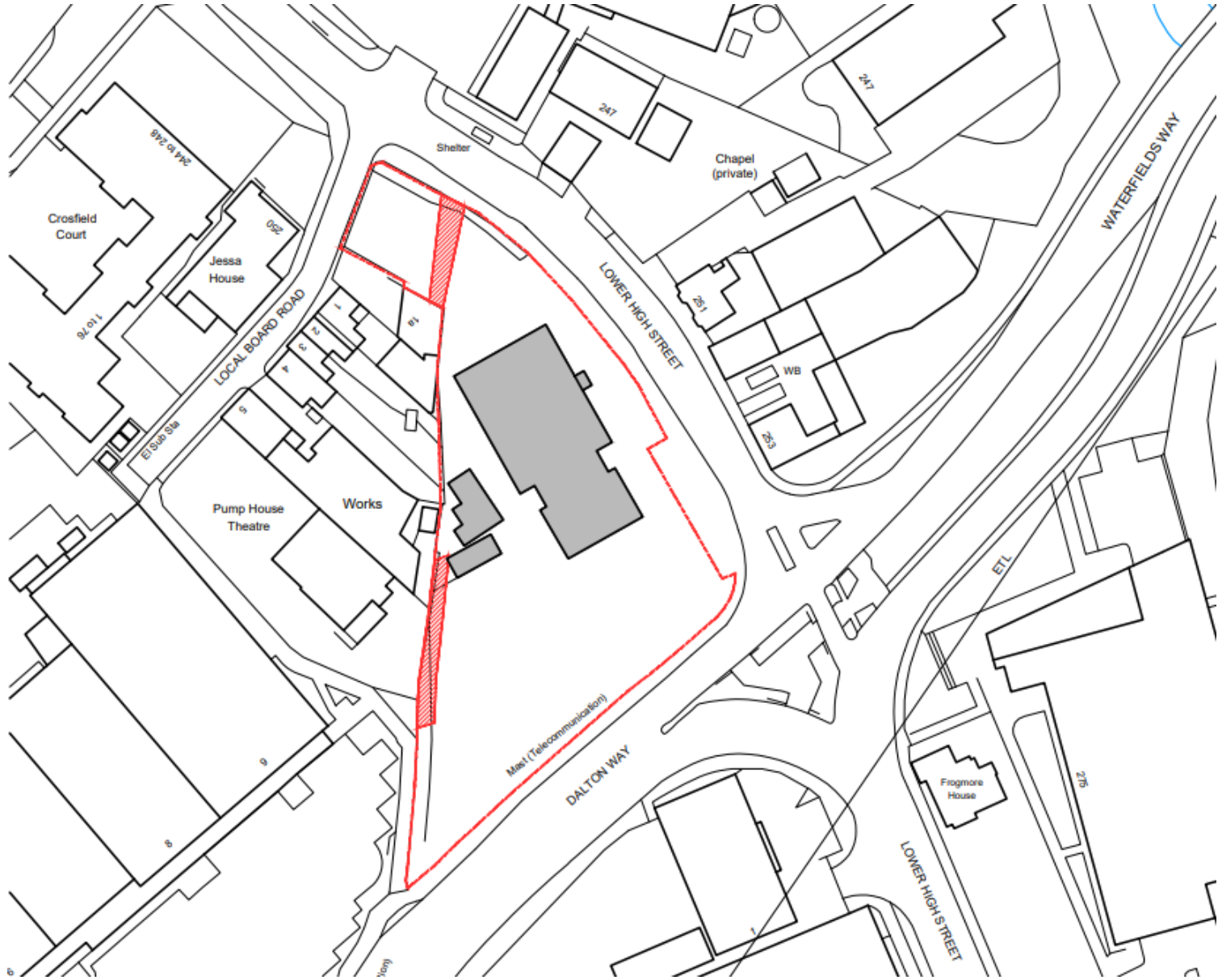
Sustainability

- The development will also need to justify its height and density by providing significant sustainability benefits. As a development on a clear site, it should aim for very high standards in relation to both embodied and operational carbon. A comprehensive sustainability strategy will be needed to demonstrate how this will be achieved, and should form a core part of the design approach.

Next steps

The panel is available to review the scheme again, if required, when the design team has been able to respond to its comments.









DALTON WAY

LOCAL BOARD ROAD

LOWER HIGH STREET



ation)



Front elevation Block C and D (Lower High Street)

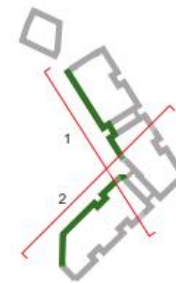


Front elevation Dalton Way

7.15 Bay Studies - Garden



1. Proposed Garden Elevation 1



2. Proposed Garden Elevation 2

Rear elevations

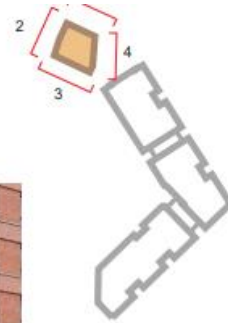




1. Proposed Block E - North Elevation



2. Proposed Block E - West Elevation



3. Proposed Block E - South Elevation



4. Proposed Block E - East Elevation

Block E elevations



Dalton Way CGI

9.4 View 4 - Waterfields Way (looking West)

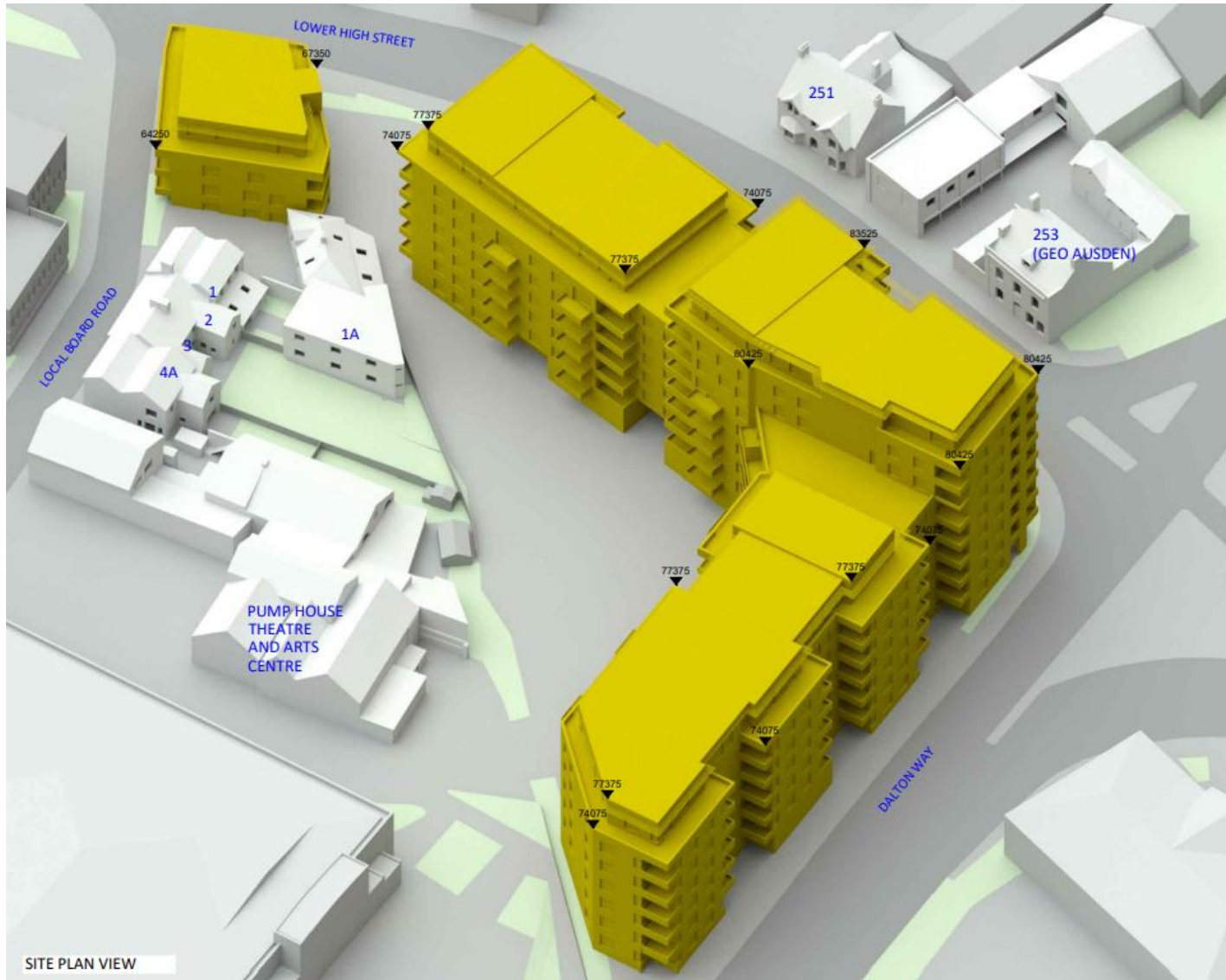


9.5 View 5 - Lower High Street (looking South)



9.8 View 8 - Local Board Road (looking South East)





3D massing model from Daylight and Sunlight report



3D massing model from Daylight and sunlight report

Agenda Item 6

Committee date	Tuesday 6 December 2022
Application reference Site address	22/01091/FULM – Cambridge House 47 Clarendon Road Watford
Proposal	Proposed refurbishment of existing three storey office building, demolition of plant deck and erection of a three storey extension above to include a roof terrace.
Applicant	Mr Sonny Sandhu
Agent	STOAS Architects Ltd
Type of application	Full planning application
Reason for committee item	Major application
Target decision date	12 December 2022
Statutory publicity	Watford Observer, Site Notice and Neighbour Letters
Case officer	Chris Osgathorp chris.osgathorp@watford.gov.uk
Ward	Central

1. Recommendation

- 1.1 That planning permission be granted subject to conditions and S106 obligations, as set out in section 8 of this report.

2. Site and surroundings

- 2.1 The application site comprises a 3 storey office building with basement car park, which is located within the designated Clarendon Road Primary Office Location.
- 2.2 The site is not within a conservation area and there are no nearby listed buildings.
- 2.3 The nearest residential properties are to the north-west at Nos. 17-19 Monmouth Road. A group of mature trees are adjacent to the rear boundary, which filters views from the neighbouring properties towards the application site. None of the nearby trees are protected by a Tree Preservation Order.

3. Summary of the proposal

3.1 Proposal

- 3.2 The application proposes refurbishment of the existing three storey office building, demolition of the plant deck and erection of a three storey extension above to include a roof terrace. A roof terrace is also proposed above the existing ground floor element at the rear. Furthermore, alterations are proposed to the landscaping at the front.

- 3.3 The existing property has 71 car parking spaces (including 2 disabled). The proposal would reduce the overall car parking number to 68 but increase the disabled parking spaces to 7. There would also be provision for 14 electric vehicle charging points. Cycle storage for 52 cycles would be provided in the basement and the forecourt.
- 3.4 **Conclusion**
- 3.5 The proposed development would provide an increase of 1,494sqm in office floorspace over the third and fourth floors. This increase in floorspace would intensify and make more effective use of employment land, which supports the objectives in Policies EM4.1 and EM4.3 of the Watford Local Plan 2021-2038 (the Local Plan). Furthermore, the proposal would refurbish the existing building and improve the quality of the office accommodation, including new thermally efficient windows, a new glazed lobby, new external amenity spaces and ancillary facilities.
- 3.6 The proposed external alterations would enhance the character and appearance of the host building and the surrounding area. Furthermore, the proposed development would not cause significant harm to the living conditions of neighbouring properties.
- 3.7 The provision for electric vehicle charging, cycle storage and disabled parking bays accords with the minimum standards in the Local Plan. An overall reduction in parking spaces is proposed, which is acceptable in this accessible location. The Highway Authority has requested the submission of a full Travel Plan and Travel Plan monitoring fees of £6000, which could be secured through a s106 agreement. This is to encourage a modal shift towards greener, more sustainable travel patterns.
- 3.8 The retention of the existing building fabric would minimise the environmental impact of the proposal due to the decrease in waste from demolition and reduction in embodied energy associated with new construction. The sustainability measures include air source heat pumps and new thermally efficient windows throughout. A BREEAM pre-assessment has been submitted with the application, which indicates that it would be possible to achieve an 'excellent' standard. This could be secured through a planning condition.
- 3.9 It is therefore concluded that the proposed development accords with the development plan as a whole and so it is recommended for approval, subject to conditions and completion of a s106 Agreement.

4. Relevant policies

- 4.1 Members should refer to the background papers attached to the agenda. These highlight the policy framework under which this application is determined. Specific policy considerations with regard to this particular application are detailed in section 6 below.

5. Relevant site history/background information

- 5.1 20/01223/PREAPP - Pre Application Advice for two storey roof extension to provide additional 1,020 sqm of office accommodation, facade enhancements, improvements to the ground floor entrance and public realm and car and cycle parking basement level. Advice Note issued December 2020. The guidance is summarised as follows:

- The provision of improved quantity and quality of office floorspace is supported.
- The site offers significant potential for visual improvement. The alterations to the entrance area to create a glazed entrance lobby and open, landscaped front approach would create significant improvement to the building frontage and public realm.
- The proposals to retain and refurbish the existing building are welcomed in principle as a sustainable development approach. However, there are some concerns that the vertical emphasis of the new floors does not sufficiently relate to the strong horizontal emphasis of the retained building. Furthermore, further consideration should be given to materiality as even the best render products do not typically result in a successful high quality finish. Cladding with contemporary brick slips or similar high quality grey/off white cladding may create an improved appearance.
- The reduction in parking spaces is supported and accords with the maximum parking standards in Appendix 2 of the Watford District Plan 2000.
- The cycle parking provision is supported as are the shower and changing facilities which will support cycle use.
- Due to the proximity and height of the proposed development, this is unlikely to create any new or increased adverse impact to light or outlook to dwellings at Nos. 17 and 19 Monmouth Road. The landscaping of the roof terraces to the rear of the development should,

however, be laid out and landscaped to avoid overlooking to residential properties in Monmouth Road.

- The retention and refurbishment of the building rather than demolition and redevelopment provides a more sustainable approach to improving the site and is welcomed. The development also provides opportunities for improved plant and energy efficiency. Opportunities should be taken to maximise the environmental credentials of the scheme.

6. Main considerations

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

- (a) Principle of the development;
- (b) The effect of the proposal on the character and appearance of the area;
- (c) The effect on the living conditions of neighbouring properties;
- (d) Access, parking and highway matters;
- (e) Sustainability;
- (f) Biodiversity;
- (g) Surface water drainage.

6.2 (a) Principle of the development

The application site is located in the Clarendon Road Primary Office Location. Policy EM4.1 of the Local Plan states that to meet the employment needs in Watford, provision is made for 85,488sqm net additional office floorspace (Use Class E(g)(i)). New office growth will be prioritised at the Clarendon Road Primary Office Location. Sustainable economic growth will be supported by, amongst other things, ensuring that employment land is intensified to make the most effective use of land. Policy EM4.3 of the Local Plan says that proposals for new office development that result in no net loss of office floorspace in the Clarendon Road Primary Office Location will be supported.

6.3 The proposed development would refurbish the existing building and provide an increase of 1,494sqm in office floorspace over the third and fourth floors. Furthermore, the scheme includes an enlarged glazed lobby area on the ground floor, including a reception, and a 252sqm amenity area on the fifth floor providing ancillary café and meeting rooms. There would also be provision for new external roof terraces at fifth floor and above the ground floor towards the rear of the building.

6.4 The refurbishment of the existing office building, along with the new glazed lobby, new external amenity spaces and ancillary facilities would improve the quality of the office accommodation. The new upward extension would provide tall ceilings and a light and spacious working area. Furthermore, the increase in office floorspace would intensify and make more effective use of employment land, which supports the objectives in Policies EM4.1 and EM4.3 of the Local Plan.

6.5 (b) Character and appearance

Clarendon Road comprises multi-storey office buildings of varying design and scale. The application site is a narrower plot than others in Clarendon Road and the scale of the existing building appears modest in context of the size of the buildings in the vicinity. The proposal would remove the existing plant room at third floor and erect a 3 storey upwards extension. The top floor would be recessed from the front elevation, which would limit the bulk of the proposal as viewed from Clarendon Road. It is considered that the proposal would be commensurate with the general height and scale of adjacent buildings and would therefore sit comfortably in the street scene.

6.6 The external walls of the existing building are finished in brickwork and projecting concrete fins, and the detailing has a horizontal emphasis due to the proportions of the windows, the horizontal banding and the arrangement of the materials. The main entrance is recessed beneath the first floor and appears rather gloomy and un-inviting. Overall, the appearance of the existing building is quite dated and un-attractive. Furthermore, the landscaping to the front is predominantly hard-surfaced with raised concrete planters comprising box hedges, which does little to soften the appearance of the building.

6.7 The alterations to the front elevation include the replacement of the existing windows and brick panels at first and second floor with a curtain walling system to match the new glazed extension above. The concrete fins on the corners would be retained and rendered to provide a more updated appearance whilst retaining some features of the original building. There would be a bronze coloured metal fin mullion detail within the glazed curtain walling which would carry through from the retained part of the building to the new upward extension. This would provide definition and a vertical emphasis to the entire elevation that would integrate the old and new elements and provide a coherent appearance. In this respect, the proposal has addressed concerns from officers at pre-application stage that the vertical emphasis of the new floors would not sufficiently relate to the strong horizontal emphasis of the retained building.

- 6.8 The recessed space beneath the first floor at the front would be infilled with tall glazed curtain walling, which would increase the prominence of the main entrance and provide a light and spacious lobby area. This would make the approach to the building more attractive and inviting. The alterations to the landscaping, including new tree planting, would also provide an improved appearance and a more defined entrance to the building.
- 6.9 The central circulation core would be finished in grey cladding and extend the full height of the building. This would provide a visual break between the front and rear elements of the building, which would have a different fenestration pattern. To the rear, the existing brick walls would be retained and the windows would be replaced with new thermally efficient glazing in a style to complement the new glazed upward extension that would sit above. Overall, the design approach would provide an acceptable appearance which would be a significant improvement upon the existing building. A planning condition should be imposed to require details of the proposed materials to ensure that high quality
- 6.10 For the above reasons, the proposal would enhance the character and appearance of the host building and the surrounding area, in accordance with Policies QD6.2, QD6.3 and QD6.4 of the Local Plan.
- 6.11 (c) living conditions of neighbouring properties
- The nearest residential properties are to the north-west at Nos. 17-19 Monmouth Road. The proposed upward extension would not cause a significant loss of light or outlook to the neighbouring properties due to the sizeable separation that would be maintained and the oblique position of the subject building in relation to the rear elevation of the neighbouring properties. It is also noted that the large trees to the rear of the application site would partially screen views of the proposal from the neighbouring dwellings.
- 6.12 The proposed windows and roof terraces would not infringe the 27.5m privacy arc measured from the rear habitable windows of Nos. 17-19 and would not be within 11m of the neighbouring gardens. The proposal therefore complies with the privacy guidelines in Section 7.3.16 of the Watford Residential Design Guide (the RDG) – whilst the RDG is intended for residential development it nevertheless provides useful guidance on this matter. Taken together with the screening provided by the mature trees, the proposal would not cause a significant loss of privacy to the neighbouring occupiers.
- 6.13 For the above reasons, the proposed development would have no adverse effect on the living conditions of the occupiers of adjacent properties.

6.14 (d) Access, parking and highway matters

The property has an existing basement car park and a small parking area on the forecourt, which provides a total of 71 spaces (including 2 disabled). The proposal would reduce the parking provision to 68 parking spaces but increase the disabled parking provision to 7. Having regard to the accessible location of the site close to rail and bus services, the reduction in parking spaces is acceptable. The increase in disabled parking is supported and these would be located close to the lift within the basement which would aid accessibility. Provision would be made for 14 electric vehicle charging points, which accords with the requirement in Policy ST11.5 of the Local Plan for 20% of spaces to have active charging infrastructure.

6.15 The cycle parking standards in Appendix D of the Local Plan require a minimum of 1 space per 100sqm for employees and 1 space per 500sqm for visitors. This equates to a minimum cycle storage standard of 52 spaces. Amended plans were submitted during the course of the application to increase the cycle storage provision and meet the minimum standards. 46 spaces would be provided in the basement, with 6 on the forecourt. It is noted that shower facilities would be provided at basement level near to the main cycle store, which would encourage cycle trips.

6.16 The highway authority has raised no objection to the proposal. Nevertheless, they require the submission of a full Travel Plan and financial contributions of £1,200 per annum for 5 years towards monitoring of the Travel Plan. These provisions are to be secured through a s106 Agreement. This is to encourage a modal shift towards greener, more sustainable travel patterns. It is noted that a Travel Plan was submitted with the application, however the Highway Authority requires additional details as set out in their consultation response.

6.17 (e) Sustainability

The retention of the existing building fabric would minimise the environmental impact of the proposal due to the decrease in waste from demolition and reduction in embodied energy associated with new construction. The sustainability measures include air source heat pumps and new thermally efficient windows throughout. A BREEAM pre-assessment has been submitted with the application, which indicates that it would be possible to achieve an 'excellent' standard. A planning condition to require the submission of a Compliance Certificate for approval should be imposed in accordance with Policy CC8.2 of the Local Plan.

6.18 (f) Biodiversity

The existing site has little biodiversity value because a large proportion of the site is covered by the basement and the footprint of the existing building. Given that the proposal would not involve a complete re-development of the site, there are limited opportunities to enhance biodiversity. Nevertheless, it is considered that the new planting to the forecourt, including new trees, and the provision of a green roof at first floor would provide acceptable enhancements to biodiversity. A condition to require the submission of a detailed landscaping scheme for approval should be imposed, which could include native planting.

6.19 (g) Surface water drainage

The application form indicates that it is proposed to connect surface water drainage to the existing system, which would be through the main sewer. The applicant states that it is not possible to provide on-site SUDS schemes because the basement extends to the full boundary of the site under the ground floor hard landscaping. This restricts the potential for underground attenuation tanks. Furthermore, the existing structure that is being re-used does not allow sufficient strength for attenuation at roof level. In these circumstances, and mindful that the scheme is for an extension to an existing building rather than re-development, the absence of a SUDS scheme is considered to be acceptable.

7. Consultation responses received

7.1 Internal Consultees

Consultee	Comment Summary	Officer response
Highway Authority	No objection subject to condition requiring the submission of a Construction Management Plan for approval and a s106 Agreement to require the submission of a full Travel Plan and monitoring contributions of £6000.	Noted.
Arboricultural Officer	No objection.	Noted.
Waste & Recycling	No objection.	Noted.

Thames Water	<p>Noted that there is a strategic sewer within 15m of the site. Requested a condition which requires that no piling is carried out until a Piling Method Statement is submitted and approved.</p> <p>The scale of the proposed development would not materially affect the sewer network and so there are no objections.</p> <p>The catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the Lead Local Flood Authority to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer.</p>	The proposal is for an upward extension and the existing basement would be retained. As such, it is not considered that a condition relating to piling is necessary.
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7.2 Interested parties

Letters were sent to 11 properties in the surrounding area. A notice was posted outside the site on 16 September 2022 and a notice was published in the Watford Observer on 16 September 2022. No responses were received.

8. Recommendation

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 the submission and implementation of a full Travel Plan.

- (ii) To secure a financial payment to Hertfordshire County Council of £6,000 for the long term monitoring of the Travel Plan for the site.

Conditions

1. Time Limit

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

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

2. Approved Drawings and Documents

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

0001 Rev P01; 0002 Rev P01; 0003 Rev P03; 0004 Rev P01; 0011 Rev P03;
1001 Rev P01; 1002 Rev P01; 2001 Rev P01; 2002 Rev P01; 2003 Rev P01;
2004 Rev P01; 5001 Rev P01; 0316-BDL-XX-XX-DR-L-0801-P01.

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

3. Construction management plan

No development shall commence until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the construction of the development shall only be carried out in accordance with the approved plan. The Construction Traffic Management Plan shall include details of:

- a) photographic condition survey of public carriageways, verges and footways in the vicinity of the site;
- b) routing of demolition and construction vehicles to/from the site;
- c) access arrangements to the site (inclusive of signage);
- d) programme of works (work programme and/or timescale for each phase of the demolition, excavation and construction works);
- e) the estimated number, type and routing of construction vehicles per day/week;
- f) traffic management requirements (including areas designated for car parking, loading/unloading and turning areas);

- g) construction and storage compounds (including areas designated for car parking, loading/unloading and turning areas);
- h) siting and details of wheel washing facilities, cleaning of site entrances, site tracks and the adjacent public highway;
- i) timing of construction activities (including delivery times and removal of waste) and to network peak times;
- j) provision of sufficient contractors, staff and visitors on-site parking prior to commencement of construction activities;
- k) details of measures to protect pedestrians and other highway users from construction activities on the highway;
- l) coordination with other development projects in the vicinity;
- m) details of measures and training to reduce the danger posed to cyclists by HGVs, including membership of the Freight Operators Recognition Scheme or an approved equivalent;
- n) where works cannot be contained wholly within the site a plan should be submitted showing the site layout on the highway including extent of hoarding, pedestrian routes and remaining road width for vehicle movements.

Reason: To minimise the impact of construction works on highway safety, congestion and parking availability, in accordance with Policy CC8.5 of the Local Plan. This is a pre-commencement condition because the carrying out of construction works before the provision of an agreed plan could cause harm to highway safety.

4. Materials

No external work above ground level (apart from demolition) shall be carried out until details of the materials to be used for all the external finishes of the development hereby approved, including all external walls, all roofs, doors, windows, fascias, rainwater and foul drainage goods, have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and samples.

Reason: To ensure that the proposed development applies high quality materials that makes a positive contribution to the character and appearance of the area, in accordance with Policies QD6.1 and QD6.4 of the Local Plan.

5. Hard and Soft Landscaping

Prior to the first occupation of the upward extension hereby approved, full details of both hard and soft landscaping works, including:

- trees and soft landscaping to be planted (including location, species, density and planting size),
- a scheme of ecological enhancements,
- details of any changes to ground levels around the building,
- materials for all pathways, all hard surfacing and amenity areas/paving, and,
- boundary treatments,

shall be submitted to and approved in writing by the Local Planning Authority. The approved landscaping scheme, with the exception of the planting, shall be completed prior to any occupation of the development. The proposed planting shall be completed not later than the first available planting and seeding season after completion of the development. Any new trees or plants which within a period of five years, 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 visual appearance of the site and to ensure that enhancements to biodiversity are provided in accordance with paragraphs 8c), 174d) and 180d) of the National Planning Policy Framework and Policy NE9.1 of the Local Plan.

6. Electric vehicle charging

Prior to the first occupation of the upward extension hereby approved, 14no. active electric vehicle charging points shall be provided in accordance with the approved drawings. The electric charging infrastructure shall be retained at all times thereafter.

Reason: To ensure that the proposed development achieves high levels of sustainability, in accordance with Policy ST11.5 of the Local Plan.

7. Cycle parking

Prior to the first occupation of the upward extension hereby approved, cycle storage for 52 cycles shall be provided in accordance with the approved plans. The cycle storage facilities shall be retained at all times thereafter.

Reason: To ensure that the proposed development encourages a modal shift towards sustainable transport patterns, in accordance with Policy ST11.4 of the Local Plan.

8. BREEAM Certificate

The development shall be constructed to BREEAM Excellent in accordance with the BREEAM pre-assessment prepared by sol environment Ref. BREEAM UK RFO 2014 BESPOKE (offices). No part of the upward extension hereby approved shall be occupied until a post-completion certificate to certify that the BREEAM Excellent standard has been achieved has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure high quality and sustainable construction methods, in accordance with Policy CC8.2 of the Local Plan.

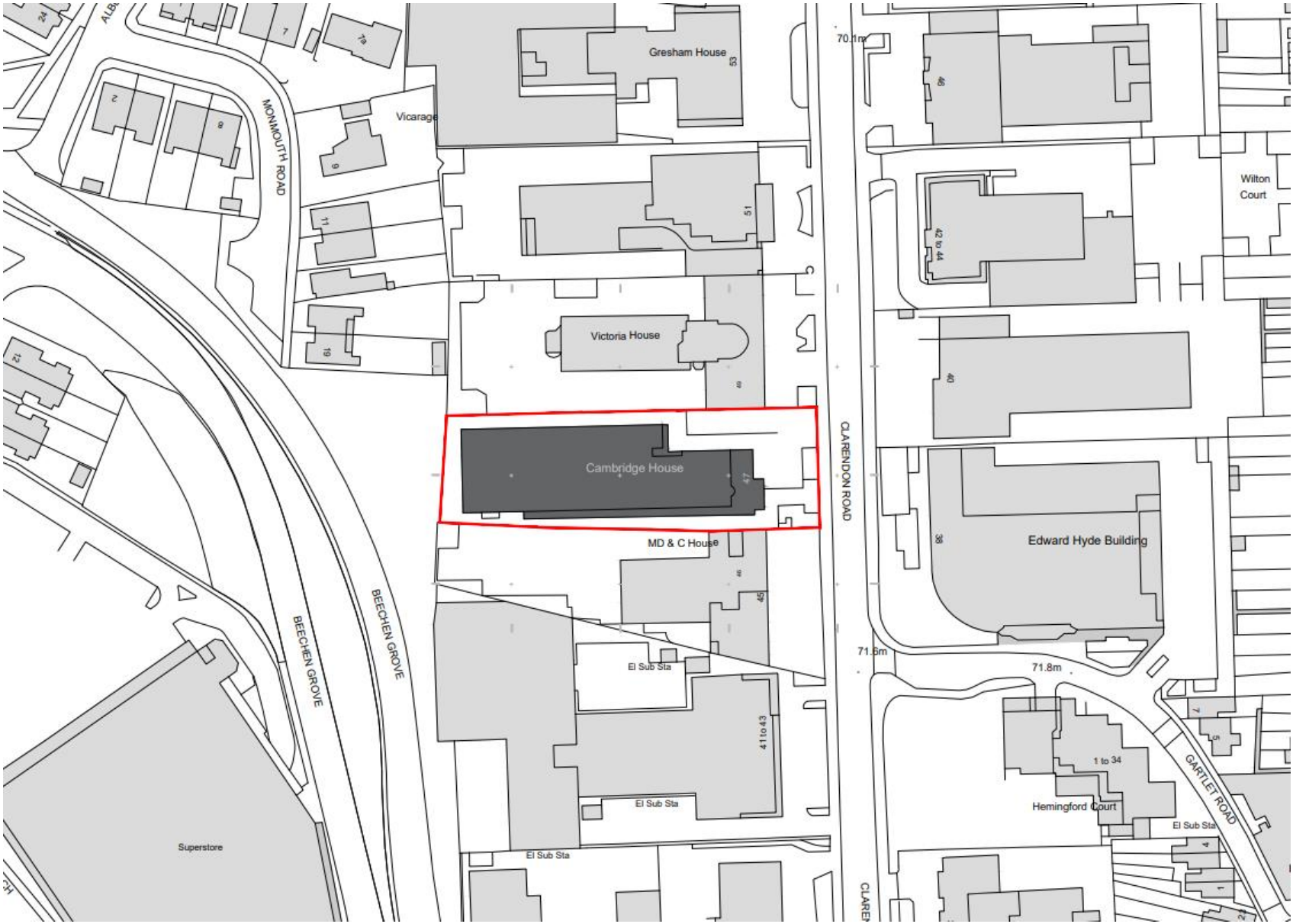
9. Plant

The upward extension hereby approved shall not be occupied until details of all new plant, ventilation and extraction systems for the building have been submitted to and approved in writing by the Local Planning Authority. Details shall include appropriate noise assessments carried out in accordance with BS4142 and undertaken by appropriately qualified technical consultants.

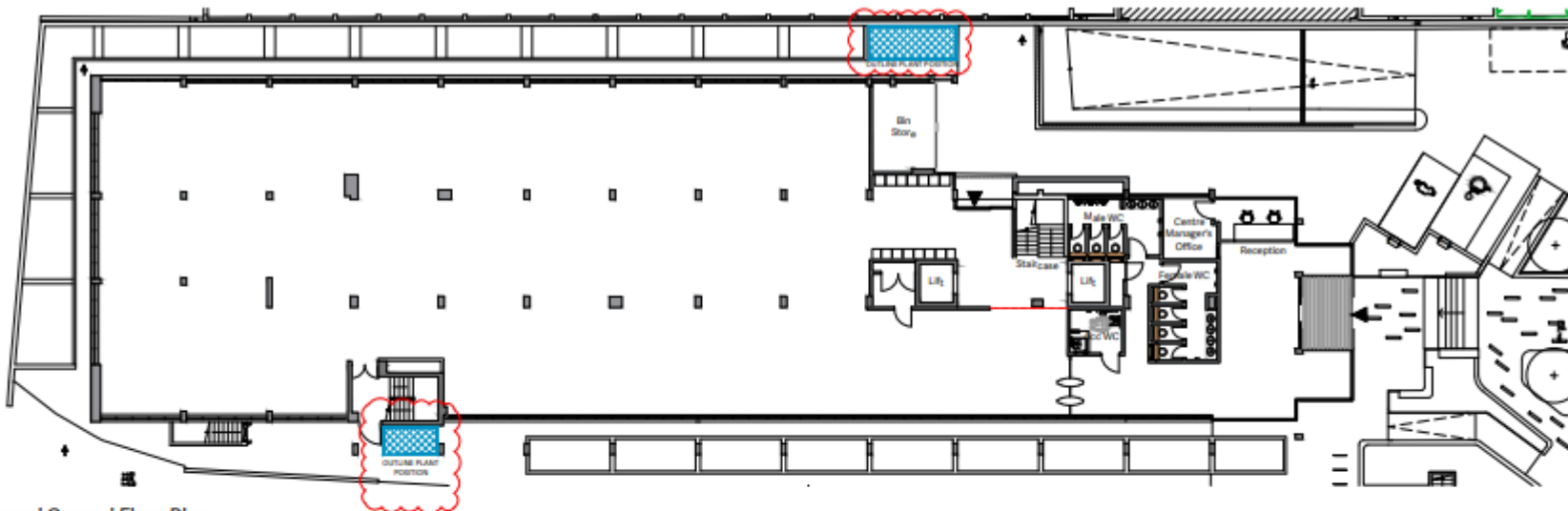
Reason: To prevent noise disturbance and in the interests of the amenity of the area, in accordance with Policy CC8.5 of the Local Plan.

Informatives

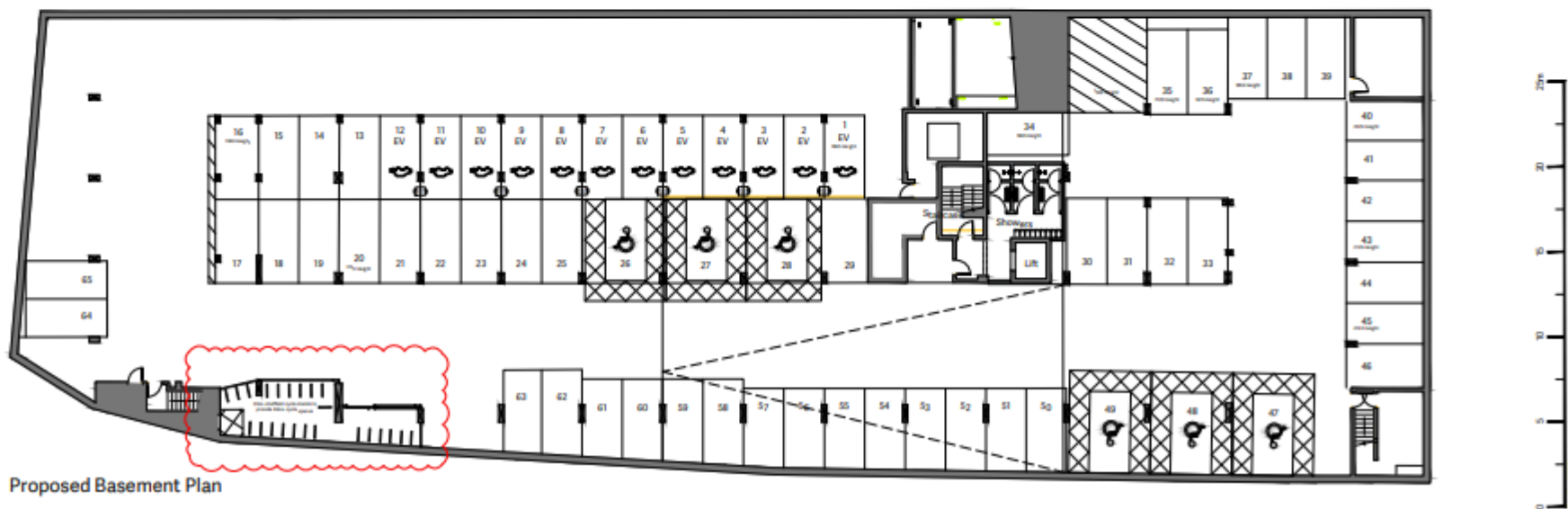
1. IN907 – Positive and proactive statement
2. IN910 – Building Regulations
3. IN911 – Party Wall Act
4. Section 106 Agreement



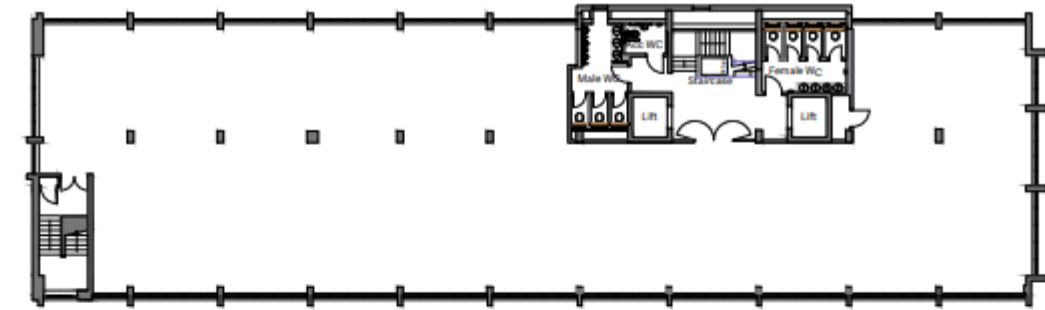




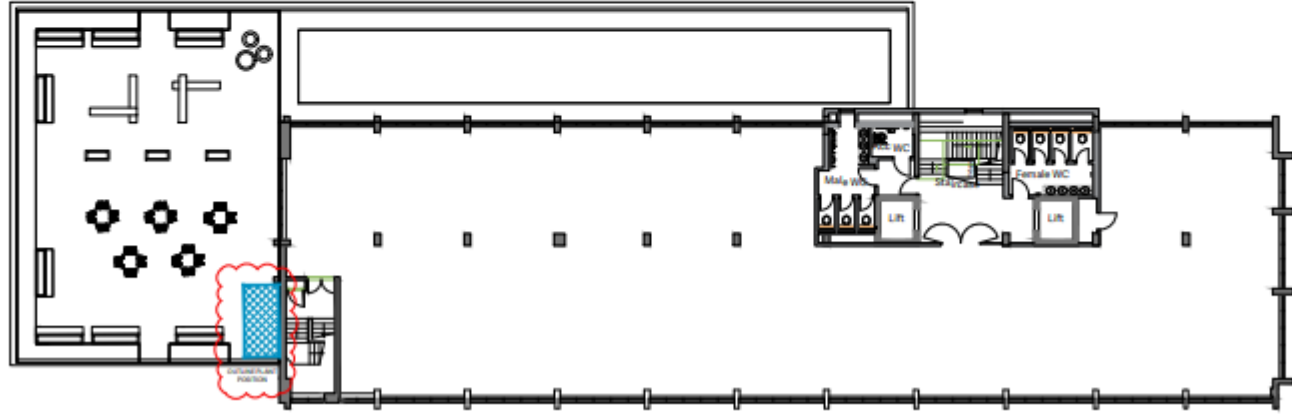
Proposed Ground Floor Plan



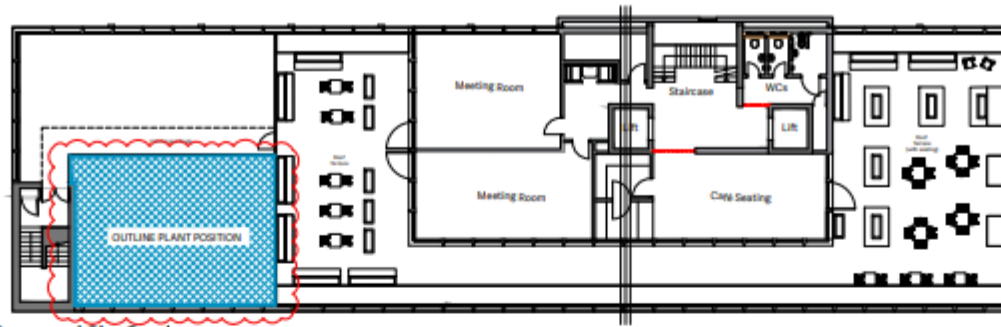
Proposed Basement Plan



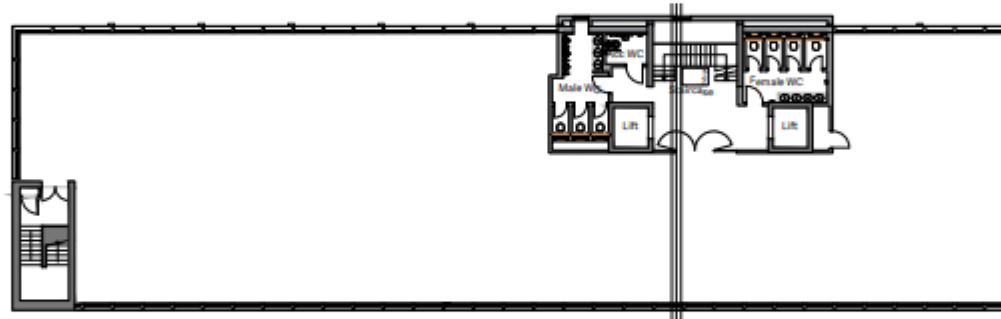
Proposed Second Floor Plan



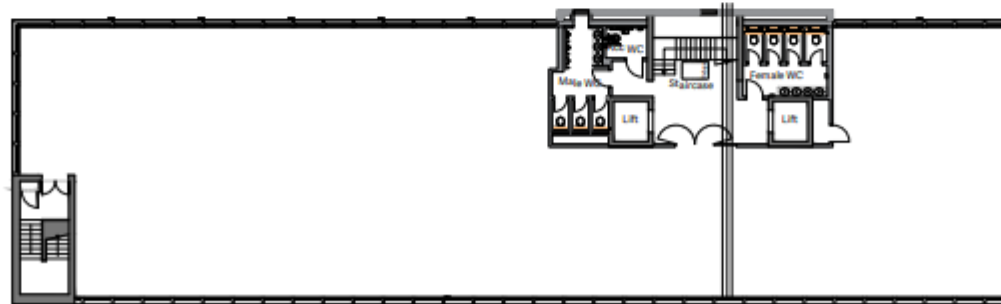
Proposed First Floor Plan



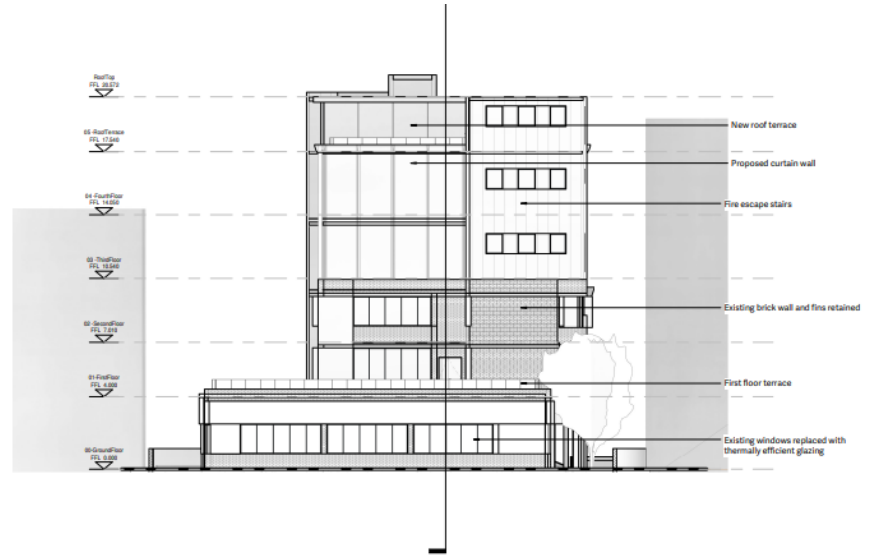
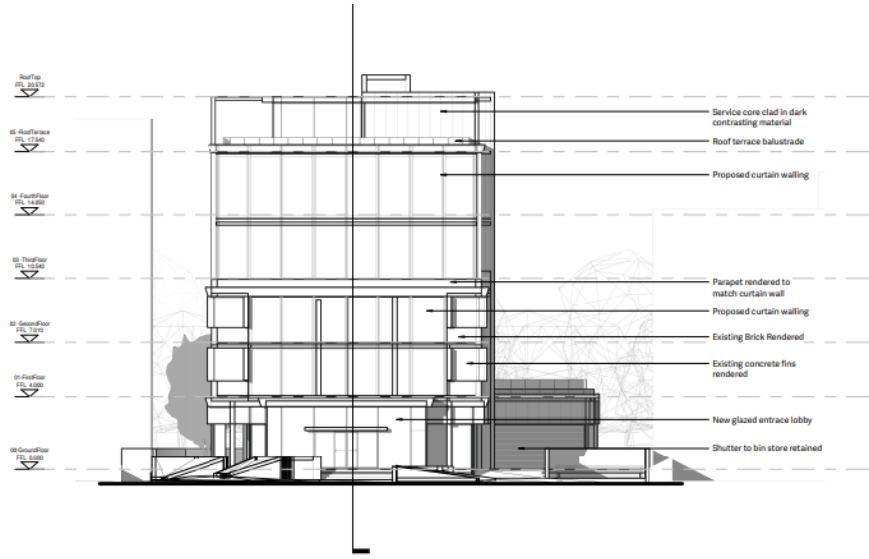
Proposed Sky Garden

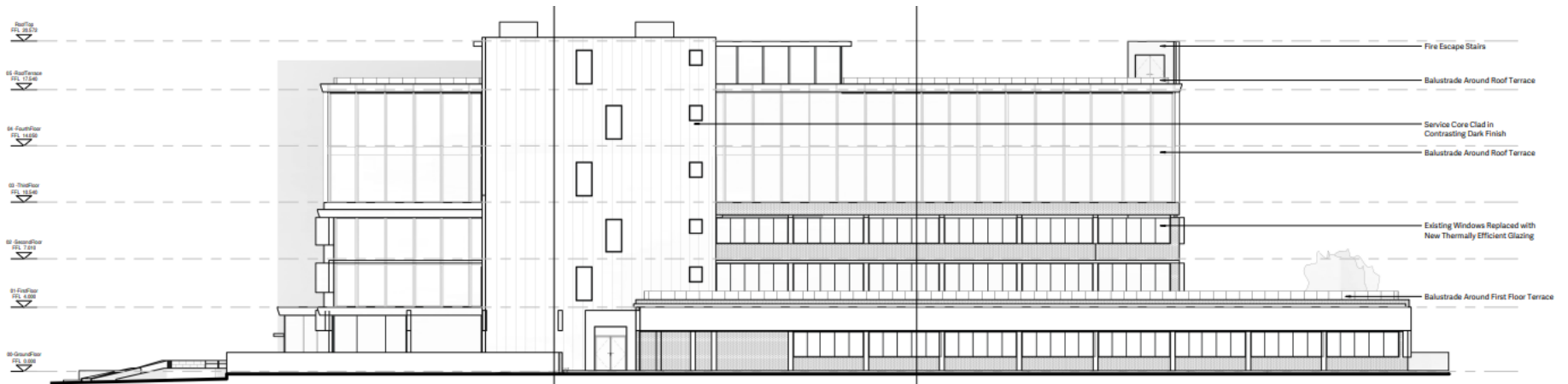


Proposed Forth Floor Plan

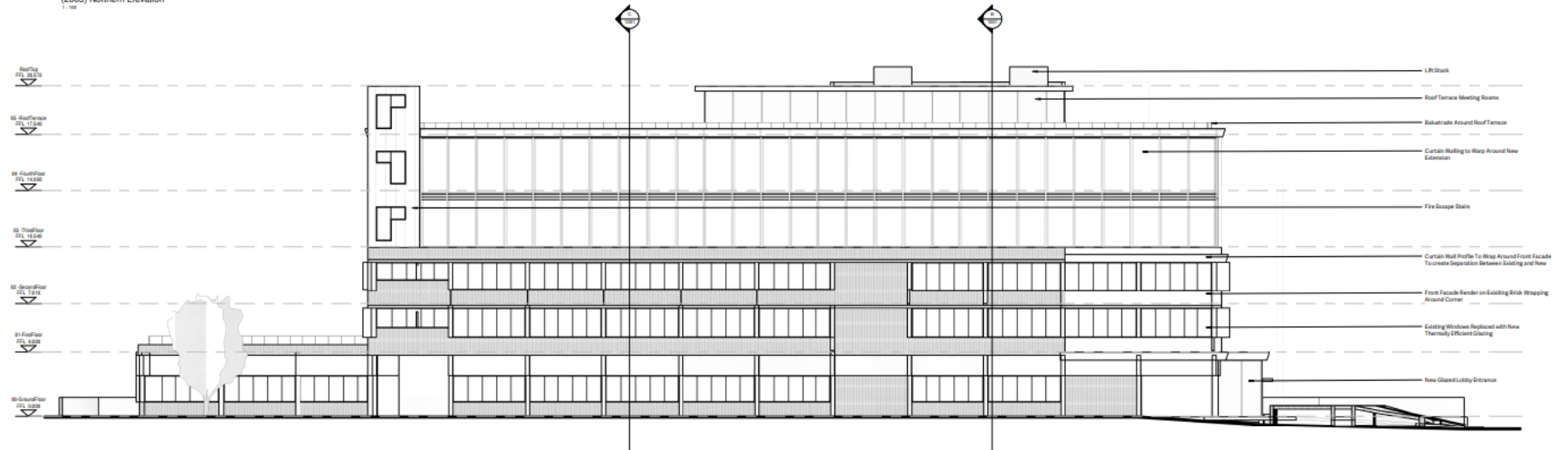


Proposed Third Floor Plan





(2003) Northern Elevation
1:100





37-39 Clarendon Road
Emerging Development

47 Clarendon Road
Proposed Site

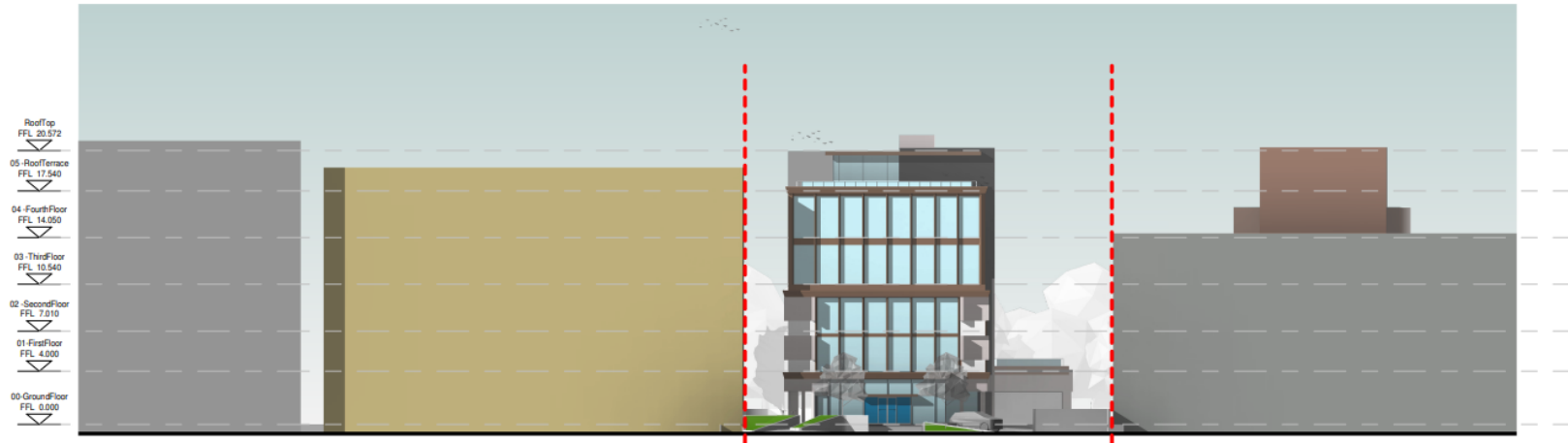
53 Clarendon Road
Emerging Development

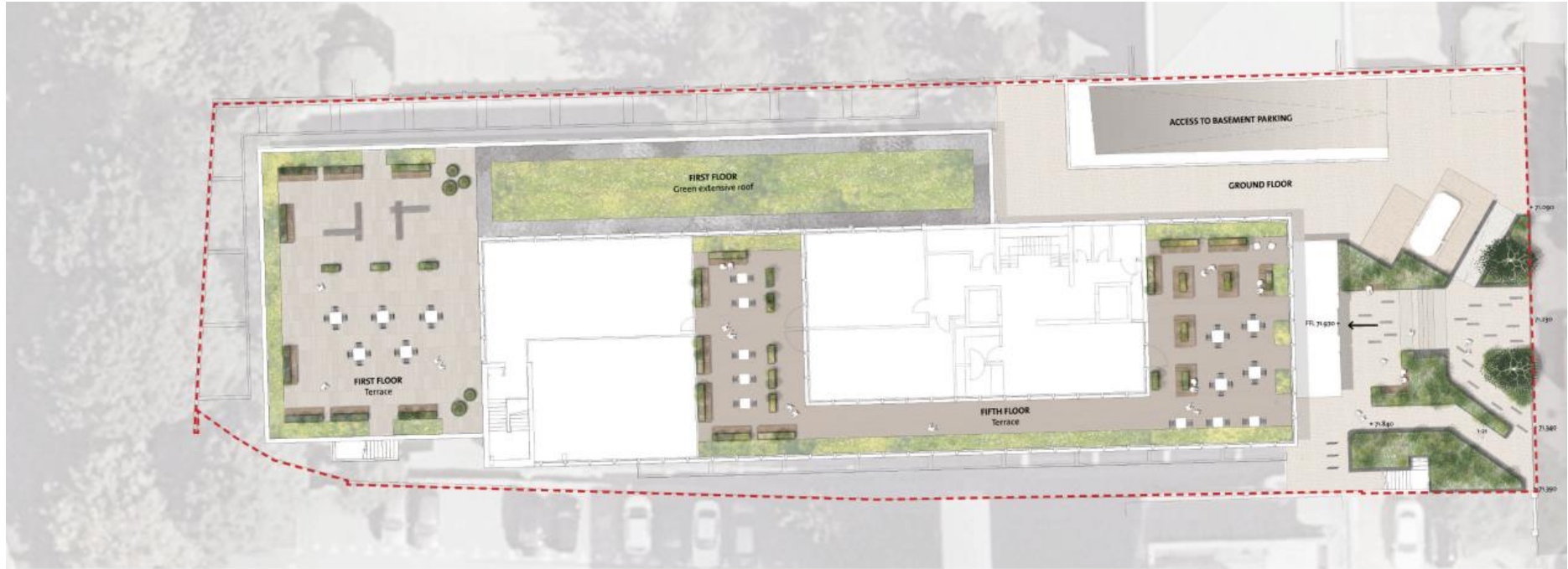


Fig. 5 Proposed Street Scene



Site Section E-E
1 : 200





KEY:

-  **SITE BOUNDARY**
- GROUND FLOOR ENTRANCE LEVELS**
-  + 71.230 Existing level
-  + 71.970 Proposed level
-  **MAIN ENTRANCE**

GROUND FLOOR LEVEL:

-  **HIGH QUALITY PAVING**
-  **ACCESS STEPS TO APPROVED DOCUMENT PART M**
-  **RETAINING WALLS**
-  **PAVEMENT MARKING TOWARDS THE ENTRANCE**

-  **TREES**
Single stem trees
-  **CYCLE STANDS**
Steel cycle stands
-  **RAISED METAL PLANTERS**

FIRST AND FIFTH FLOOR TERRACES:

-  **PORCELAIN DECKING**
To first floor amenity area
-  **PORCELAIN DECKING**
To fifth floor amenity area
-  **EXTENSIVE GREEN ROOF**
-  **GRAVEL MARGIN**

STREET:

-  **METAL PLANTERS**
-  **METAL PLANTER ISLANDS WITH INTEGRATED BENCHES**
-  **TRELLIS FOR CLIMBING PLANT**
-  **BISTRO/BAR TABLES AND CHAIRS**

Agenda Item 7

Committee date	Tuesday, 6 December 2022
Application reference Site address	22/00215/FULM- The Orient Centre, Greycaine Road, Watford, WD24 7GP.
Proposal	Demolition of existing office building and construction of replacement light industrial units to include uses B2 General industrial, E(g)(ii) Research and development, E(g)(iii) Industrial processes, B8 Storage and distribution (including trade counter)
Applicant	Azurie Blue Ltd
Agent	Dwell Architects Ltd
Type of Application	Full Planning Permission
Reason for committee Item	Major Application
Target decision date	9 th December 2022
Statutory publicity	Watford Observer, Neighbour letters and Site Notice
Case officer	Kate Pickard, kate.pickard@watford.gov.uk
Ward	Tudor

1. Recommendation

- 1.1 That planning permission be granted subject to conditions, as set out in section 8 of this report.

2. Site and surroundings

- 2.1 The subject site comprises two separate plots of land which are to the north end of Greycaine Road. Plot 1, the Orient Centre, comprises 3 units with car parking to the front and is 4938sqm in area. Plot 2 provides car parking space and is 1289sqm in area. The existing two storey building consists of three office units providing a total Gross Internal Area of 3231sqm. The two plots comprise 80 car parking spaces.
- 2.2 The surroundings are comprised predominantly of commercial/industrial uses, though the eastern boundary of the car park site does adjoin the residential rear gardens on numbers 83 to 79 (odds) Tudor Walk.
- 2.3 The site is within a Designated Industrial Area. The industrial area is subject to an Article 4 direction which removes permitted development rights for conversion to residential use. The site is not located in a designated conservation area or other Article 2(3) land and is not a listed building.

3. Summary of the proposal

3.1 Proposal

The key elements of this application proposal can be summarised as:

- Demolition of all the existing office buildings on site;
- Construction of four new industrial units to total 2620sqm of Gross Internal Area;
- Within planning use classes
 - B2 General industrial,
 - E(g)ii Research and development,
 - E(g)iii Industrial processes and
 - B8 Storage and distribution;
- Provision of new parking and access, and;
- Landscaping and hardstanding works

3.2 The four units are proposed as follows:

- Unit 1 would have a gross internal area of 915 square metres within a building which is 13.2 metres high to the ridge line, and 19 car parking spaces.
- Unit 2 would have a gross internal area of 610 square metres within a building which is 13.2 metres high to the ridge line, and 13 car parking spaces.
- Unit 3 would have a gross internal area of 610 square metres within a building which is 13.2 metres high to the ridge line, and 13 car parking spaces.
- Unit 4 would have a gross internal area of 485 square metres within a building which is 10.2 metres high to the ridge line, a rear eaves height of 6 metres on the residential boundary and front eaves height of 8m and 12 car parking spaces. The building is 5.5 metres away from the residential boundary.

3.3 Conclusion

The proposed industrial buildings will provide modern employment floorspace within this existing employment area in accordance with Watford Local Plan Policy EM4.2 and would accord with the Local Plan objectives for employment growth and be compliant with Local Plan Policy EM4.1. The scale and design of the proposed buildings are considered to be acceptable. Following amendments to the scheme, the amenity of residential dwellings on Tudor Walk would not be adversely harmed by the development. There are considered to be no adverse effects that outweigh the benefits of the

proposal, therefore it is recommended that the application should be approved subject to conditions.

4. Relevant policies

- 4.1 Members should refer to the background papers attached to the agenda. These highlight the policy framework under which this application is determined. Specific policy considerations with regard to this particular application are detailed in section 6 below.

5. Relevant site history/background information

- 5.1 Built in 1989 various planning applications exist for minor developments which relate to the industrial use of the site.
- 5.2 The application was submitted on 18th February 2022. Amendments have been made to the proposal during the course of the application in line with consultee and neighbour responses.
- 5.3 Revisions have been to Unit 4 sited in the former car-park. The unit has been reduced in height at the rear where it abuts the rear gardens and moved back in the site away from the residential boundary by 5.5m. The amendments respond to neighbour concerns and comments by the Council's Tree Manager.

6. Main considerations

- 6.1 The main issues to be considered in the determination of this application are:
- (a) Principle of the development;
 - (b) Design and layout;
 - (c) Access, parking and traffic generation;
 - (d) Impact upon neighbouring properties; and
 - (e) Environmental considerations
- 6.2 (a) Principle of the development
The Local Plan makes provision for 25,206sqm net additional industrial floorspace (Use Classes B2, B8, E(g)(ii) and E(g)(iii)) and 85,488sqm of net additional office floorspace (Use Class E(g)(i)). To meet these targets, the Local Plan will seek to prevent the net loss of office and industrial floorspace across the Borough. New industrial growth will be prioritised in the five Designated Industrial Areas. In pursuance of this growth, Strategic Policy EM4.1 of the Watford Local Plan states that proposals for new employment floor space will

be supported where they contribute towards meeting the identified employment need in the borough and Functional Economic Market Area.

- 6.3 Policy EM4.2 Designated Industrial Areas, states that proposals for new industrial employment uses will be supported where they contribute to the identified need for industrial land set out in the South West Herts Economic Study Update, stating that proposals that would incur a net loss of industrial floorspace will be resisted in these areas. Separate policy for office floorspace in designated office areas is detailed in Policy EM4.3 for office development.
- 6.4 The application site is located in the Greycaine Road industrial area which is allocated as an area of employment on the Policies map and designated for industrial uses. The proposed use for industrial purposes is therefore in accordance with the designation.
- 6.5 The Gross Internal Area of the buildings on site would incur a net loss as a result of the development, reducing from 3231sqm of office floor space to 2260sqm of industrial floorspace. The loss would however be of office floorspace which Policy EM4.2 does not seek to retain in industrial areas and which instead is sought in designated office areas. Furthermore, the development does make more efficient use of the site by replacing a poor quality two storey office building with industrial space, which, by its nature, is predominantly at ground floor. The proposed development is therefore supported, in principle, in accordance with industrial designation of this site and the Watford Local Plan employment objectives
- 6.6 (b) Design and layout
Strategic Policy QD6.1 seeks to deliver high quality design across the borough. This policy identifies that the borough is divided into 3 distinct areas – Core Development Area, Established Areas and Protected Areas - with a separate approach for each area. The site is located in an area identified as an established area, within which proposals should be led by the existing characteristics of the local area and should reinforce and where appropriate enhance the character of the area.
- 6.7 The proposed layout of the two plots is comprised of four industrial units with the largest unit on the main site (Unit 1), along with two smaller units (Units 2 and 3). A new building (Unit 4) is proposed on the former car parking area. Employment space would be primarily at ground floor level. Ancillary office accommodation would be at first floor level within the units.
- 6.8 In terms of materials and finishes, the buildings would be formed as steel portal framed structures with insulated wall and roof panels. Roof lights

provide natural light to the internal areas. External walls would be clad in composite panels, with a flat external surface and the panels applied horizontally. The panels would be coloured in two tones of grey, with the darkest tone at the base of each building. The lighter tone at higher level softens the vertical emphasis of the building and reduces its visual dominance. Fenestration and personnel doors would be formed in thermally broken aluminium and the loading bay doors formed in coated steel heavy-duty roller shutters outlined by coloured feature cladding. The service yards would be enclosed by 2.4 metre high fencing.

- 6.9 It is considered that the proposed layout makes more effective use of the existing site, and the external appearance of the units is acceptable in the context of the site's industrial setting.
- 6.10 (c) Access, parking and traffic generation
Strategic Policy ST11.1 sets out that development should support sustainable travel options including supporting and improving walking, cycling and sustainable transport options. Policy ST11.6 states that a transport assessment is required to support planning applications for all developments to assess impact to the highway network.
- 6.11 The application is supported by a Transport Statement which analyses the proposed parking provision and anticipates the parking demand likely to be generated by the proposed development. The proposed site and change in land use from the existing B1 office (which typically generates the highest trip rates) to B2/B8, it is expected the vehicle trip generation at the proposed site may reduce and will not have a severe impact to the operation of junctions on the local highway network.
- 6.12 Hertfordshire County Council as the Highway Authority have agreed the findings of the Transport Assessment, however, they had raised an objection in respect of concerns with the proposed widening of vehicle access points and crossovers to allow for improved vehicle access to the development. The Highway Authority had been concerned that the widening of these access points would create potential conflict with pedestrians using the footway. The proposals have been amended to include the provision of a continuous footway crossover provided at all accesses to allow safe pedestrian routes past the site. The Highway Authority would seek for these works to be delivered as part of an S278 agreement and has subsequently withdrawn their objection subject to suggested conditions.

- 6.13 Policy ST11.5, supported by Appendix E, sets out maximum car parking standards for new development. Appendix E of the Local Plan states that the maximum parking standard for a Class B2 use are 1 space per 150sqm, and for Class B8 use are 1 space per 150sqm and for Class E use are 1 space per 100sqm. The policy also states that for all schemes, 20% of parking spaces should have active charging infrastructure for electric vehicles provided, all other spaces should have passive provision.
- 6.14 The proposed development includes the following parking provision:
Combined Units 1, 2 and 3 would have 45 spaces:
20% active provision for EV charging – 9 spaces
80% of the car parking spaces to have passive provision for EV charging – 36 spaces
- Unit 4 would have 12 spaces:
20% active provision for EV charging – 3 spaces
80% of the car parking spaces to have passive provision for EV charging – 9 spaces
- 6.15 In applying the maximum parking standards, the proposed floor space of 2620sqm should have a maximum provision of 26 car parking spaces in accordance with the standards of Appendix E. The proposed 57 car parking spaces would be significantly in excess of this maximum standard, however, the proposed 57 spaces would be a net reduction from the existing 80 car parking spaces on site. As such, the parking provision and associated vehicle activity will reduce. The development also introduces EV charging for the site and encourages alternative transport options. As such, in this instance, the parking provision is considered to be acceptable.
- 6.16 Policy ST11.4 seeks to encourage walking and cycling and is supported by Appendix D which seeks a minimum provision of bicycle storage in new developments. Seven cycle spaces are provided for Units 1, 2 and 3 and two cycle spaces are provided for Unit 4 which in the form of a secure cycle store within the frontage of each plot to be secured by condition. This will encourage cycling for local journeys and those within the wider area and is in accordance with Policy ST11.4 and Appendix D of the Local Plan.
- 6.17 It is, therefore, considered that the proposed access arrangements, parking provision and traffic generation resulting from this redevelopment are acceptable and that the development will sufficiently support the transport objectives of the Local Plan

6.18 (d) Impact on neighbouring properties

The rear gardens of numbers 83 to 79 (odds) Tudor Walk adjoin the eastern boundary of the car park site where proposed Unit 4 will be located. The design of Unit 4 has been revised to respond to neighbour representations and concerns over the impacts to existing trees in the gardens of neighbouring properties. Specifically, proposed Unit 4 has been reduced in height and mass at the rear where impacts to neighbouring properties have been mitigated. It is now proposed as 10.2 metres high to the ridge line, at the rear has an eaves height of 6 metres a front eaves height of 8 metres. The building would be set 5.5 metres into the site and away from the residential boundary and root/canopy protection zones of boundary trees. It is therefore considered that the development would be sufficient distances from properties and would not create adverse impacts.

6.19 (e) Environmental considerations

Sustainability

Policy CC8.2 of the Local Plan states that proposals should be designed to reduce their impact on the environment and should use resources efficiently as part of the construction and operation of a building. Pursuant to this, non-residential major developments should aim to achieve BREEAM excellent standard and a planning conditions should secure a Compliance Certificate of BREEAM excellent standards. The application was not submitted with a BREEAM pre-assessment statement however the required standard of BREEAM 'Excellent' is secured by condition.

6.20 *Trees*

The most significant trees are those that surround the car parking area proposed for Unit 4. There were 19 identified:

1 Category A - x1 silver maple

8 Category B - x2 silver maple, x2 Norway maple, x3 silver birch, x1 cherry

8 Category C - x4 goat willow, x2 wild cherry, x2 silver birch

2 Category U - x1 goat willow, x1 wild cherry

6.21 None of the trees are protected by a Tree Preservation Order and none are proposed to be removed. The trees throughout the site are not individually outstanding specimens, but are considered important to the area and in breaking up views between industrial units, and to mitigate against the views of the industrial site from the rear gardens of the adjacent properties No.s 83 to 79 Tudor Walk. The applicant has included an Arboricultural Impact Assessment and a tree survey. A condition on tree and landscaping should be implemented to ensure the future amenity value of the site and tree scape is maintained.

6.22 *Biodiversity*

The application does not propose the loss of the trees as detailed in the Arboricultural Impact Assessment. The retention of these trees will maintain their important biodiversity value. The remainder of the site has little biodiversity value and the proposed landscaping condition will secure a soft landscaping scheme to include native planting and biodiversity enhancements.

6.23 *Surface Water Drainage*

The proposed application has not included a strategy for surface water drainage management however this is recommended to be secured prior to commencement of development by condition.

7. Consultation responses received

7.1 Statutory consultees and other organisations

Name of Statutory Consultee / Other Organisation	Comment	Response
Environment Agency	No objection	Noted
Thames Water	No objection	Noted
Hertfordshire Constabulary	General comments made. No objection.	Noted
HCC Highways	Objection to widening of the access points and potential conflict with pedestrians using the footway	Noted and drawings amended
Hertfordshire County Council Growth and infrastructure unit	General comments made. No objection.	Noted

7.2 Internal Consultees

Name of Internal Consultee	Comment	Response
WBC Environmental Health	Requested noise assessment upon occupation, no objection in principle	Condition proposed

WBC Waste and Recycling	No objection	Noted
WBC Arboricultural Officer	Objection to location of Unit 4, on the residential boundary and impacts to trees.	Revised drawings for Unit 4, location moved away from tree canopy and root protection zone. Reconsulted, no objection subject to conditions.

7.3 Interested parties

Letters were sent to 25 properties in the surrounding area. Three responses were received two from 79, Tudor Walk and one from 81 Tudor Walk. The main comments are summarised below, the full letters are available to view online:

Comments	Officer response
Building height of Unit 4 and shadowing	See paragraph 6.14 of this report.
Loss of light, privacy overdevelopment	See paragraph 6.14 of this report.
Hours of operation	As the site is within an industrial area it is not considered appropriate to restrict the working hours.

8. Recommendation

8.1 That planning permission be granted subject to the following conditions:

Conditions

1. Time limit

The development to which this permission relates shall be begun within a period of 3 years commencing on the date of this permission.

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

2. Approved drawings and documents

The development hereby permitted shall be carried out in accordance with the following approved drawings and documents:

- 0395-A100 SITE PLANS
- 0395-A101 EXTG PLANS
- 0395 A107
- F22002_02 REV A
- F22002_03 REV A
- F22002_04 REV A
- F22002_05 REV A
- 0395-A103 PROPOSED PLANS (UNIT 1)
- 0395-A104 PROPOSED PLANS (UNITS 2&3)
- 0395-A300 EXTG N&S ELEVATIONS
- 0395-A301 EXTG E&W ELEVATIONS
- 0395-A302 PROP ELEVATIONS- ORIENT CENTRE
- 0395 CAR PARK SITE
- 0395-A200 SECT 1 & 2 (REV A).
- 0395-A102 PROPOSED SITE PLANS (REV A).
- 0395-A105 PROPOSED PLANS (UNIT 4)(REV A

- DESIGN AND ACCESS STATEMENT 1
- DESIGN AND ACCESS STATEMENT 2
- MPL TREE CONSULTANCY LTD ARBORICULTURAL IMPACT ASSESSMENT. REF. PD002248A. DATED JUNE 2022
- F22002 GREYCAINE ROAD WATFORD – TRANSPORT STATEMENT. REF. BANCROFT CONSULTING. DATED JANUARY 2022.

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

3. Surface Water Drainage

No construction works shall commence until a detailed surface water drainage strategy has been submitted to and approved in writing by the Local Planning Authority. The strategy shall include surface water storage/attenuation for the 1 in 100 year storm event with a 40% allowance for climate change and greenfield run-off rates.

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

4. Materials

No development shall commence until details and samples of the materials to be used for all the external finishes of the development hereby approved, including all external walls, all roofs, doors, windows, fascias, rainwater and foul drainage goods, have been submitted to and

approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and samples.

Reason: To ensure that the development applies high quality materials that respond to the buildings context and makes a positive contribution to the character and appearance of the area, pursuant to Policies QD6.2 and QD6.4 of the Watford Local Plan 2021-2038.

5. Highway Works

No unit shall be occupied until the modified access and egress arrangements for that unit, as shown in principle on the revised approved drawings F22002/02, 03, 04, 05, has been completed in full.

Reason: In the interests of the safe operation of the site and the surrounding highway, in accordance with Policies ST11.4 and ST11.5 of the Watford Local Plan 2021-2038.

6. Car Parking

The development hereby approved shall not be occupied until the new on-site car parking spaces and manoeuvring areas have been constructed and laid out in accordance with the approved drawings. The vehicular access and onsite car parking spaces and manoeuvring areas shall be retained at all times thereafter unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that adequate parking and manoeuvring space is provided for the future occupiers, in accordance with Policy ST11.5 of the Watford Local Plan 2021-2038.

7. EV charging points

The development hereby approved shall not be occupied until 20% active electric vehicle charging points (12) and 80% passive vehicle charging points (45) have been provided in accordance with Drawing No. A107. The electric charging infrastructure shall be retained at all times thereafter.

Reason: To ensure that the proposed development achieves high levels of sustainability in accordance with Policy ST11.5 of the Watford Local Plan 2021-2038.

8. BREEAM Certificate

The development shall be constructed to the BREEAM Excellent standard. No part of the development hereby approved shall be occupied until a post-completion certificate to certify that the BREEAM Excellent standard has been achieved has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure high quality and sustainable construction methods, in accordance with Policy CC8.2 of the Watford Local Plan 2021-2038.

9. Plant and equipment

No plant or equipment that generates sound shall be installed to the development until full details and specification of the equipment have been submitted to and approved in writing by the Local Planning Authority. The details shall include an assessment of the plant/equipment carried out by a suitably qualified and competent acoustic consultant to consider the potential impact on existing and future residents adjacent to the site. The details shall also include a specification of what design criteria needs to be included to the specification of the plant and its mounting on the buildings, to minimise any potential disturbance. The assessment shall include any other appropriate noise mitigation measures. All plant and equipment shall be installed as approved and no plant or equipment shall be brought into operation until any approved mitigation measures have been installed.

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

10. Soft and hard landscaping

No part of the development shall be occupied until full details of both hard and soft landscaping works, including details of all existing trees to be retained, trees and soft landscaping to be planted, any other arboricultural works to be carried out, details of any changes to ground levels around the building, all pathways, all hard surfacing, amenity areas/paving and boundary treatments, have been submitted to and approved in writing by the Local Planning Authority. The landscaping scheme shall include native planting and set out biodiversity enhancements. The approved landscaping scheme, with the exception of the planting, shall be completed prior to any occupation of the development. Any proposed planting shall be completed not later than the first available planting and seeding season after completion of the

development. Any new trees or plants which within a period of five years die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, or in accordance with details approved by the Local Planning Authority.

Reason: In the interests of the visual appearance of the site, to safeguard trees, to ensure the provision of suitable car parking, to ensure suitable amenity for future occupiers, to ensure suitable screening is maintained or provided between the site and neighbouring occupiers and to ensure that enhancements to biodiversity are provided in accordance with paragraphs 8c), 174d) and 180d) of the Framework and Policy NE9.1 of the Watford Local Plan 2021-2038.

11. Refuse, recycling and cycle stores

The refuse, recycling and cycle storage shall be constructed and installed in accordance with the approved drawing no. A107 and made available for use prior to the occupation of any part of the development. The storage shall be secure, covered and well-lit and retained as approved at all times thereafter.

Reason: In the interests of the visual appearance of the site and to ensure that adequate facilities for the proposed development are provided. The cycle storage facilities are necessary to promote the use of sustainable modes of transport, in accordance with Policy ST11.4 of the Watford Local Plan 2021-2038

12. Travel Plan

At least 3 months prior to the first occupation of the approved development a Travel Plan Statement for the site shall be submitted to and approved in writing by the Local Planning Authority. The approved Travel Plan Statement shall be implemented in accordance with the timetable and target contained therein and shall continue to be implemented as long as any part of the development is occupied subject to approved modifications agreed by the Local Planning Authority in consultation with the Highway Authority as part of the annual review.

Reason: To ensure that sustainable travel options associated with the development are promoted and maximised to be in accordance with Policies 3, 5, 7, 8, 9 and 10 of Hertfordshire's Local Transport Plan (adopted 2018).

13. Surface water run off

Prior to the first use of the development hereby permitted, arrangement shall be made for surface water from the proposed development to be intercepted and disposed of separately so that it does not discharge onto the highway carriageway.

Reason: To avoid the carriage of extraneous material or surface water from or onto the highway in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

14. Use classes B2, B8 or E(g) only

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), and any subsequent legislation that amends or supersedes this Order, the floorspace hereby approved shall only be used for purposes within Use Classes B2, B8 or E(g)(ii) and (iii) of the Town and Country Planning (Use Classes) Order 1987 (as amended), unless otherwise agreed in writing by the Local Planning Authority.

Reason: To accord with the employment designation of the land and the details of the submitted application.

Informatives

1. IN907 – Positive and proactive statement
2. IN909 – Street naming and numbering
3. IN910 – Building Regulations
4. IN911 – Party Wall Act
5. IN912 – Hours of Construction
6. IN913 – Community Infrastructure Levy Liability
7. IN915 – Highway Works – HCC agreement required

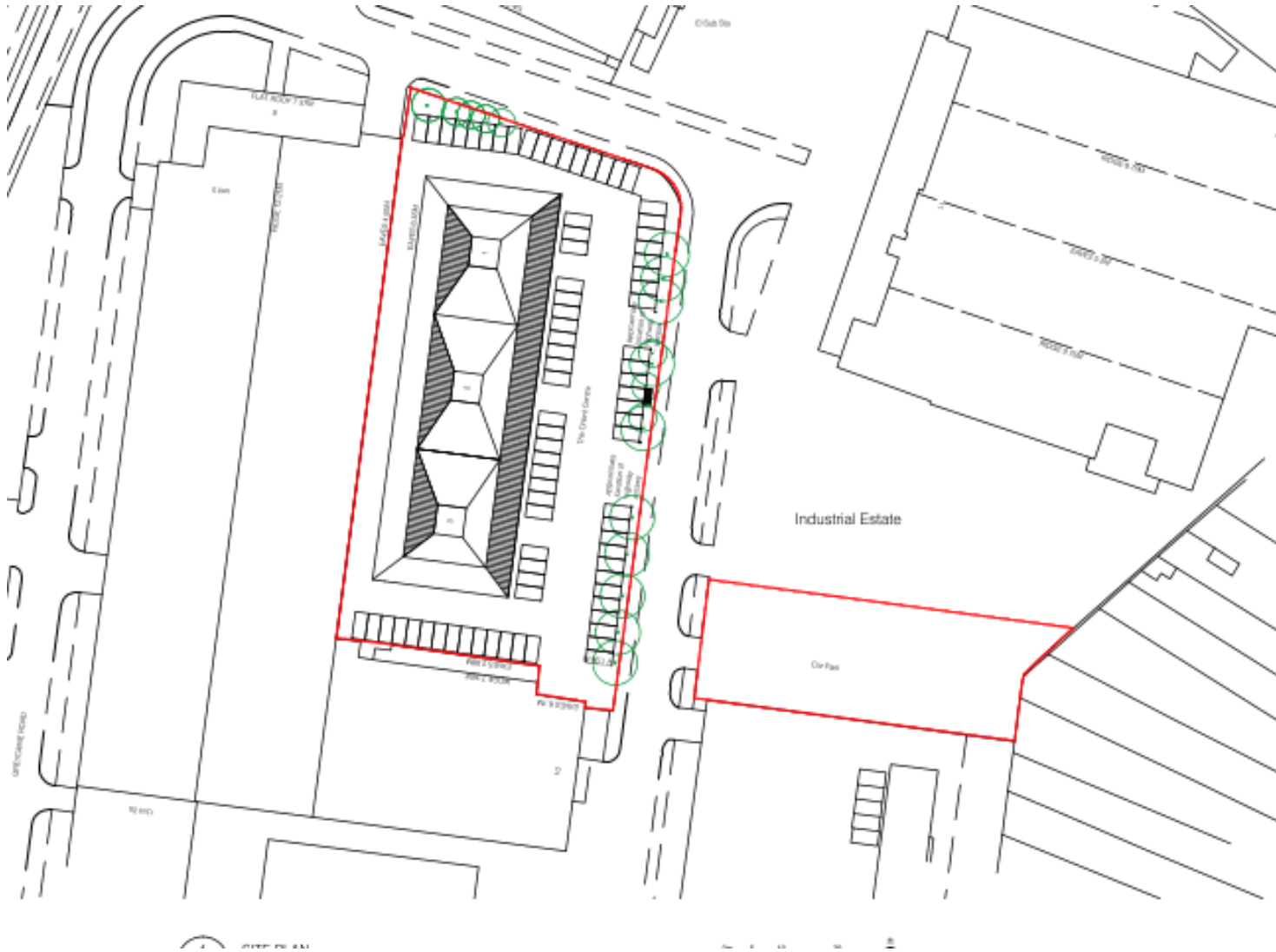
Aerial view of site



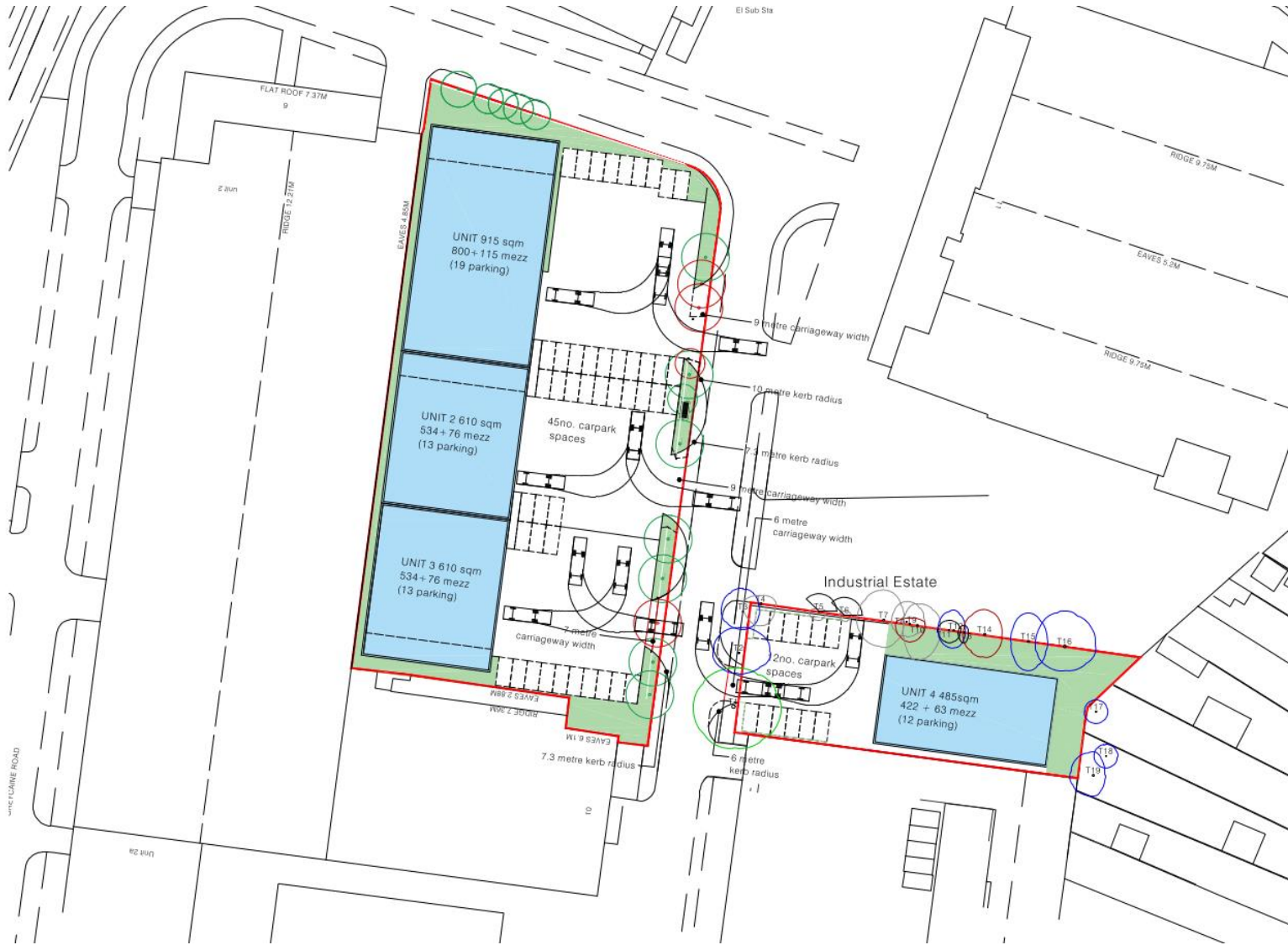
Existing – The Orient Centre from Greycaine Road



Existing site location plan



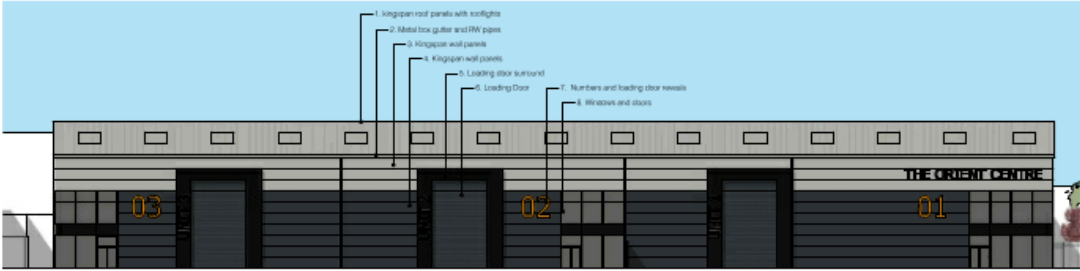
Proposed site plan



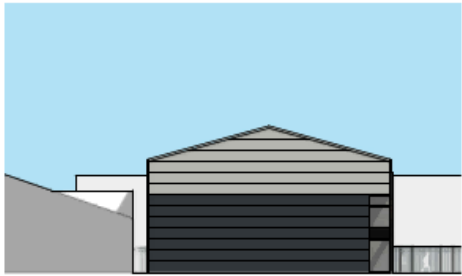
Proposed Units 1, 2, 3 in elevation



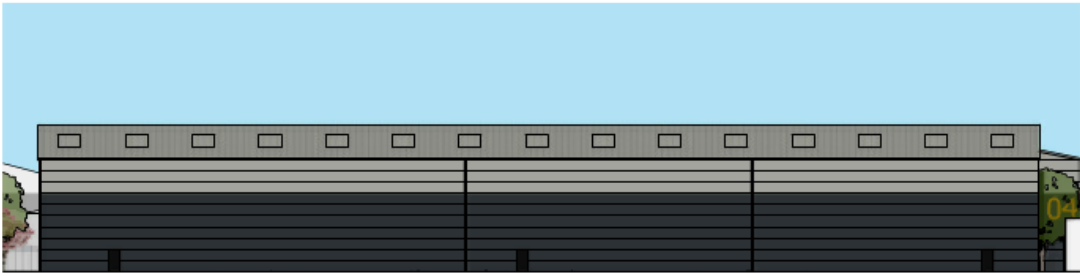
1 NORTH ELEVATION PROPOSED
SCALE 1:200 @A1



2 EAST ELEVATION PROPOSED
SCALE 1:200 @A1



3 SOUTH ELEVATION PROPOSED
SCALE 1:200 @A1



4 WEST ELEVATION PROPOSED
SCALE 1:200 @A1

KEY	
1.	KINGSPAN QuadraCore KS1000 RW Roof Panels with rooflights COLOUR- Pure Grey (RAL 900 55 00)
2.	Box Gutter & RW pipes COLOUR- Pure Grey (RAL 900 55 00)
3.	KINGSPAN QuadraCore (Evolution wall panel) COLOUR- Pure Grey (RAL 900 55 00)
4.	KINGSPAN QuadraCore (Evolution wall panel) COLOUR- Black Grey (RAL 7021)
5.	Loading door surround COLOUR- Jet (RAL 9005)
6.	Loading door COLOUR- Black Grey (RAL 7021)
7.	Numbers & shutter door reveal COLOUR- Sun Yellow (RAL 1037)
8.	Doors & windows COLOUR- Jet (RAL 9005)

KEY	
■	COLOUR- Pure Grey (RAL 900 55 00)
■	COLOUR- (RAL 7021)
■	COLOUR- (RAL 9005)
■	COLOUR- (RAL 1037)



revisions REV 1: 00/00/00 - MINOR AMENDMENTS	key [Symbol] entry / windows [Symbol] brickwork [Symbol] brickwork [Symbol] steel	notes This drawing is the copyright of the Architects and may not be reproduced or used without written permission. Dimensions must not be scaled from this drawing. The Contractor is to check and verify all loading and size dimensions before work is put in hand. The Contractor is to check and verify with all the Statutory Authorities and the Employer the location and location of any underground or overhead services or confirm that work does not clash with any existing services on site. The Contractor shall comply with all applicable regulations and working rules relating to safety, health and welfare of workpeople.	client AURIE BLUE LTD 54 TRAVEL ROAD STAMFORD LEICESTER	architect David Architects 11 Kingsway House 3, Broad Street GLoucester GL1 1PB 01793 478007 davidarchitects.david@gmail.com david@daa.co.uk	THE ORIENT CENTRE Drawing title PROPOSED ELEVATIONS - ORIENT CENTRE job no: 1395 scale: 1:200 date: 27.01.22 package no: 002 drawing no / rev: A02 / 1 status: PLANNING
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Proposed revised unit 4 in red



Proposed Unit 4, rear gardens of dwellinghouses numbered 83 to 79 Tudor Walk at rear

