

PART A	
Report of: DEVELOPMENT MANAGEMENT SECTION HEAD	
Date of Committee:	18th May 2016
Site address:	14 Stratford Road
Reference Number:	15/01662/FULM
Description of Development:	Demolition of the existing building and erection of 4 town houses and 34 apartments with associated parking, amenity space and landscaping.
Applicant:	Chase (Cassio) Limited
Date received:	30th November 2015
13 week date:	29th February 2016
Agreed extended deadline:	27th May 2016
Ward:	Nascot

1.0 SITE AND SURROUNDINGS

- 1.1 This application relates to an irregular-shaped parcel of land situated on the western side of Stratford Road between the junctions with Park Road and Church Road. It measures 0.57 hectares in area and comprises a part single storey, part two storey and part three storey building which, up until recently, had been occupied by the NHS as a community support home.

- 1.2 The building occupies a broadly central position within the site. Between the front of the building and the boundary shared with Stratford Road there is a hard-surfaced driveway and car park area. The car park also extends along the northern side of the building. The remaining parts of the site largely comprise garden areas.

- 1.3 The site is served by a vehicular access off Stratford Road. This access point lies on the northern side of the frontage. A brick wall runs along the entire frontage of the site with the exception of the opening which forms the entrance to the site.

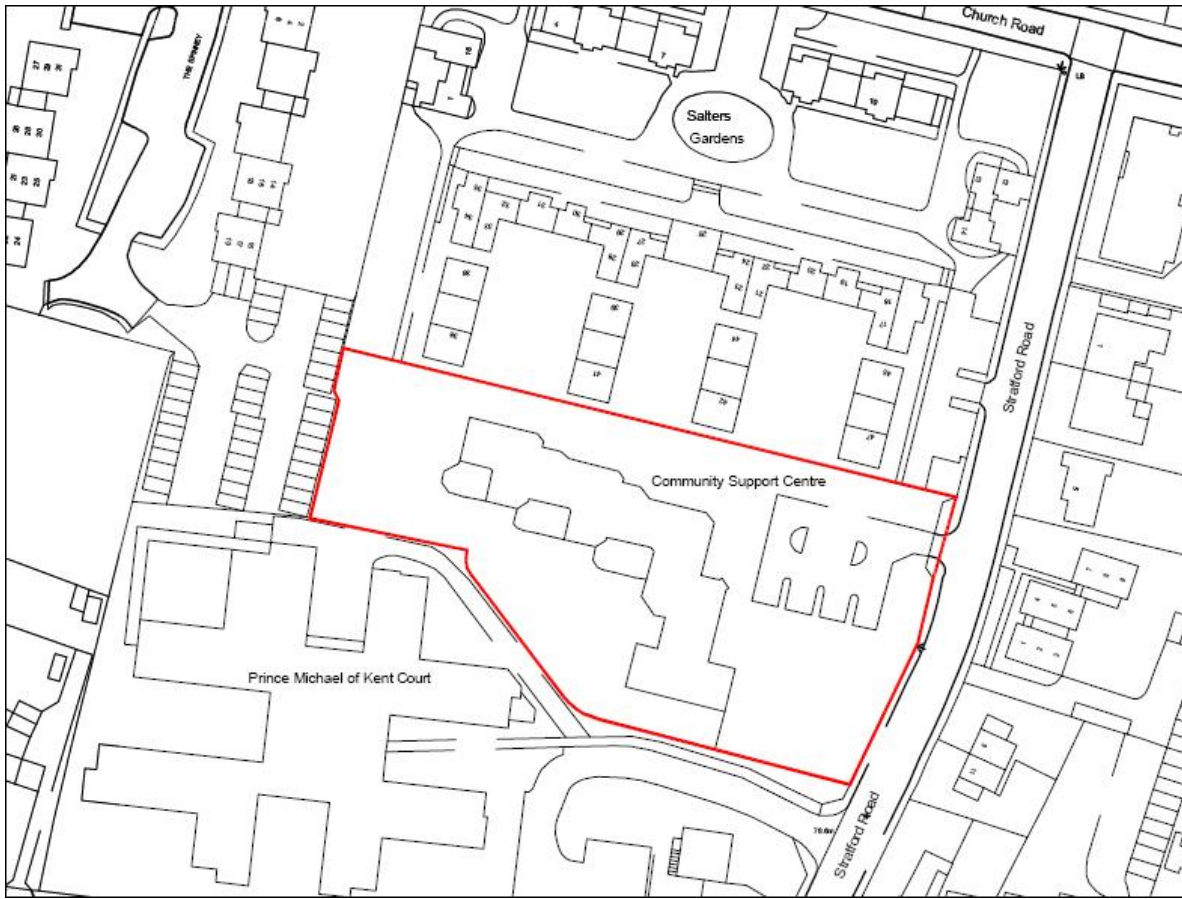


Figure 1. Site location plan

- 1.4 There are no locally or statutory listed buildings encompassed within the site. However, to the north of the site a complex of 19th century Grade II listed buildings, known as the Salter's Almshouses (1-35 Salter's Gardens) exists.
- 1.5 The site is not located within a Conservation Area but is within close proximity to the Nascot Conservation Area which has its boundary along the eastern side of Stratford Road opposite the site.
- 1.6 To the south of the site, a modern residential care home, known as Prince Michael of Kent Court exists. This complex was built in 1994 and comprises single and two storey elements. The site is bounded to the west by garage blocks associated with the flats located within The Spinney.
- 1.7 There are a number of mature trees within the site – some of which are protected by a Tree Preservation Order (TPO). These protected trees are located within the southeastern corner of the site and along part of its Stratford Road frontage (known as Group G1 and Tree T2 of TPO No. 83).

2.0 PROPOSED DEVELOPMENT

- 2.1 Full planning permission is sought for the demolition of the existing building that stands on the site and the erection of 4 houses and 34 apartments with associated parking, amenity space and landscaping.
- 2.2 The houses will comprise 2 pairs of semi-detached houses and these will occupy the rearmost portion (western end) of the site. Each of these houses will feature a single integral garage and driveway.
- 2.3 At the front of the site, towards the northern boundary, a two storey building will provide 2 one bedroom flats. The remaining 32 flats will be provided in three storey blocks that will occupy the central part of the site.
- 2.4 The existing entrance to the site off Stratford Road will be retained and utilised as the access for the development. A total of 52 parking spaces will be provided on site (including the 4 integral garages associated with the proposed houses).



Figure 2. Proposed site plan

3.0 RELEVANT PLANNING HISTORY

- 3.1 Ref. 85/00687/DOE – Community support unit and a group home – The Council raised no objection to this in February 1986.
- 3.2 Ref. 01/00336/FUL – Provision of additional on-site parking facilities – Conditional Planning Permission granted in June 2001.
- 3.3 Ref. 15/01093/PREAPP – Pre-application enquiry to redevelop the site with a residential development of 43 units in a landscaped setting – This pre-application enquiry was responded to in September 2015. Within its response, the authority expressed concerns regarding the lack of meaningful amenity space, the shortfall in private garden space, the cramped nature of the development, the failure to comply with the separation distances and the dominance of the car parking. It was recommended to the applicant that the number of units proposed on the site be reduced so as to allow a better layout to be achieved. In addition, concerns were raised with the development's impact on the visual amenity of the area.
- 3.4 Following the pre-application submission and prior to the submission of a formal application, the applicant carried out a public consultation event which took place on 3rd November 2015 between 2pm and 8pm in which local residents, ward Councillors and residents were able to put forward their views.
- 3.5 Ref. 15/01710/FUL – Retention of temporary hoarding at entrance to site for a period of 9 months – Conditional Planning Permission granted in February 2016.

4.0 RELEVANT POLICIES

4.1 National Planning Policy Framework (NPPF)

Paragraph 17 Core planning principles

Section 4 Promoting sustainable transport

Section 6 Delivering a wide choice of high quality homes

Section 7 Requiring good design

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

Section 11 Conserving the natural environment

Section 12 Conserving and enhancing the historic environment

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

1 Strategy for the Provision for Waste Management Facilities

1a Presumption in Favour of Sustainable Development

2 Waste Prevention and Reduction

12 Sustainable Design, Construction and Demolition

4.3 Hertfordshire Minerals Local Plan Review 2002-2016

No relevant policies.

4.4 Watford Local Plan: Core Strategy 2006-31

WBC1 Presumption in favour of Sustainable Development

SS1 Spatial Strategy

SD1 Sustainable Design

SD2 Water and Wastewater

SD3 Climate Change

SD4 Waste

HS1 Housing Supply and Residential Site Selection

HS2 Housing Mix

HS3 Affordable Housing

T2 Location of New Development

T3 Improving Accessibility

T4 Transport Assessments

T5 Providing new Infrastructure

INF1 Infrastructure Delivery and Planning Obligations

UD1 Delivering High Quality Design

UD2 Built Heritage Conservation

GI3 Biodiversity

4.5 Watford District Plan 2000 (saved policies)

SE7 Waste, Storage, Recovery and Recycling in New Development

SE20 Air Quality

SE22 Noise

SE23 Light Pollution

SE24 Unstable and Contaminated Land

SE27 Flood Prevention

SE28 Groundwater Quality

SE36 Replacement Trees and Hedgerows

SE37 Protection of Trees, Woodlands and Hedgerows

SE39 Tree and Hedgerow Provision in New Development

T10 Cycle Parking Standards

T21 Access and Servicing

T22 Car Parking Standards

T24 Residential Development

4.6 Supplementary Planning Guidance

Residential Design Guide (RDG)

5.0 CONSULTATIONS

5.1 Neighbour consultations

Letters were sent to a total of 64 addresses that lie within close proximity of the site. Eleven objections have been received citing the following comments:

- Nascot Wood area is being adversely affected by the constant development of large sites due to increase in properties and so population, cars etc.
- Increase in traffic and congestion.
- Strain/increased demand on local services such as schools and doctors surgeries, utilities, green space, infrastructure and residents.
- Change character of area.
- Impact on crime.
- Additional on-street parking.
- Overdevelopment – proposed development looks to maximise mass on site.
- Unsympathetic in design to its neighbours.
- Privacy issues for neighbours.
- Will create a precedent; allowing future 3 storey buildings in a predominantly 2 storey low density area.
- Noise disturbance.
- Potential loss of light to neighbouring properties.
- Development of houses would best compliment the surrounding buildings and area and not detract from character of Salter's Gardens.
- Highway safety concerns as accidents and near misses at the junction of Stratford Road/Park Road happen often. With an increase in traffic this is only likely to get worse.
- Scale and structure of the development is likely to alter the character of the street and adversely affect the experience of a neighbouring home.
- Will significantly increase the number of homes in the street, which predominantly comprises detached houses.
- Too many flats going in.
- Houses and flats too high and out of scale with buildings in immediate area.
- New buildings will block existing views of trees at the back of site from neighbouring properties.
- Increase in footfall.
- Increase in light pollution.
- Noise and heavy vehicles during construction.

- Development will be between 2 elderly people's homes and peace and quiet will be lost.
- Health centre would have been more appropriate.
- Inadequate parking.
- Further removal of trees would be unacceptable as this would impact character of area and provides habitat for birds and wildlife. Destroying the trees will also remove the screen that makes the new buildings (and any construction works) less visible and helps absorb noise and dust.
- Will make a considerable difference to the landscape and environment.
- Concerns regarding relationship between the 3 storey town houses and the single storey buildings in Salter's Gardens as the difference in height is going to threaten the intimate character of the Salter's Gardens courtyards.

5.2 One representation has been received which neither supports nor objects to the scheme.

5.3 The Committee will be advised of any additional representations received after the date this report was written.

5.4 Site Notices

Site notices were placed. These expired on 1st January 2016.

5.5 Press Notice

A notice was published in the Watford Observer on 11th December 2015. This expired on 1st January 2016.

5.6 Technical consultations

The following responses have been received from technical consultees:

5.7 Local Highway Authority (Hertfordshire County Council Highways)

The comments of the Local Highway Authority dated 23.12.15 are outlined below:

Decision

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

Conditions

Provision of Visibility Splays:

Prior to the first occupation of the development hereby permitted (or Prior to the commencement of the use hereby permitted) a visibility splay measuring 2.4 x 43 metres shall be provided to each side of the access where it meets the highway and such splays shall thereafter be maintained at all times free from any obstruction between 600millimetres and 2metres above the level of the adjacent highway carriageway.

Reason: In the interests of highway safety.

Provision of Parking and Servicing Areas:

Prior to the first occupation of the development hereby permitted (or Prior to the commencement of the use hereby permitted) the proposed servicing / loading, unloading/ turning area shall be laid out, demarcated, levelled, surfaced and drained in accordance with the approved plan and retained thereafter available for that specific use.

Reason: To ensure the permanent availability of the parking /manoeuvring area, in the interests of highway safety.

Construction Traffic (Parking):

Development shall not commence until a scheme detailing provision for on-site parking for construction workers for the duration of the construction period has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented throughout the construction period.

Reason: To ensure adequate off-street parking during construction in the interests of highway safety.

Wheel Cleaning Facilities – Temporary for Construction Vehicles:

No works shall commence on site until the details of wheel cleaning facilities for construction vehicles have been submitted to and approved in writing by the Local Planning Authority.

Reason: To prevent extraneous material being deposited on the highway.

Planning History

Pre-application advice: The applicant previously submitted a proposal for pre-application advice (reference: 15/01093/PREAPP) for a draft site layout. The proposed development consisted of the redevelopment of the Nascot Grange site to provide 43 houses. HCC provided the following comments: • The distance between the existing brick gateposts will not allow 2 vehicles to pass and that to add

pedestrian to the mixture of movements through the entrance could lead to hazardous conflict, particularly given the change of use from employment site wherein flows would tend to be in the same way to residential in which there could be more opposing movements. • There may be problems with visibility at the existing entrance since a convex mirror has been fixed to the inside of the northern gatepost. It was recommended that the pedestrian route shown in green on the plan is followed and a pedestrian entrance created by opening up the brick boundary wall. • Watford Borough Council is the parking authority for the borough and therefore ultimately should be satisfied with any proposed changes to parking arrangement on the site.

The applicant has since revised the proposal to consist of the demolition of the existing building and erection of 4 town houses and 34 apartments with associated parking, amenity space and landscaping.

The Roads in Hertfordshire Highway Design Guide 3rd edition only requires a Design and Access Statement for this level of proposal, this has been provided by the applicant in support of the revised proposal.

ANALYSIS

Trip Generation

The site has previously been used as NHS Community Support Unit and would have historically generated some level of trips. However, the building is now vacant. The applicant has not provided any information on how the proposal will impact the trip generation of the site. The applicant has proposed an additional 21 vehicle spaces so it is likely that the proposal will generate additional trips. Given the number of car bays proposed for the development if all additional vehicles were moving in the peak hour this would equate to 1 additional vehicle every 3 minutes. As such, the proposal is unlikely to have a significant impact on the surrounding network and further analysis on trip generation and trip distribution is not required.

Impact on Highway Network

Junction Modelling

The applicant has not undertaken any junction modeling for the proposal. Due to the size of the proposal this is considered to be acceptable.

Road Safety

The applicant has not provided any information on road safety. By reference to CrashMap the following collisions have been recorded: • 3 slight collisions at the junction of Langley Road and Stratford; • 2 serious collisions on Stratford Road; • 2

slight collisions at the junction of Langley Road and Park Road; and • 1 fatality at the junction of Langley Road and Park Road which occurred in 2007.

However not all traffic generated by the new development would come to this junction as some vehicles may turn left out of the development and left again onto Church Road if heading towards the A411 Hempstead Road. Also, the development is near Watford Junction which may result in some residents walking to the station.

Therefore in my view the proposal is unlikely to have a significant impact on the safety of the highway.

Highway Layout

Vehicle Access

The applicant proposes to maintain the existing vehicle access from Stratford Road opposite the entrance to the Stratford Lodge flats. HCC previously raised concerns that the distance between the existing brick gateposts would not allow 2 vehicles to pass and that to add pedestrian to the mixture of movements through the entrance could lead to hazardous conflict, particularly given the change of use from employment wherein flows would tend to be in the same way to residential use in which there could be more two-way movements.

Additionally, HCC noted that there appears to be problems with visibility at the existing entrance since a convex mirror has been fixed to the inside of the northern gatepost. Therefore, HCC recommended that the pedestrian route shown in green on the plan is followed and a pedestrian entrance created by opening up the brick boundary wall.

The applicant has not addressed the comments provided during the pre-application stage. The proposed site plan indicates that pedestrians will still share the access with vehicles and no visibility splays have been provided to justify that the access has clear site lines.

Therefore, the applicant is required to provide further justification that the access can be safely shared by vehicles and pedestrians by providing visibility plays in accordance with the requirements set out in the Roads in Hertfordshire Highway Design Guide 3rd Edition.

Refuse Vehicles

The Design & Access Statement says that all waste would be collected by suitable refuse vehicles from the new development access roads off Stratford Road. The service road appears to be a private 'no through' road. As such, the applicant will

need to provide further information in the form of a computer-generated swept path analysis to demonstrate that refuse vehicles have adequate space to manoeuvre within the site and also turn and exit the service road onto the highway in a forward gear.

Parking

Car Parking Provisions

The site currently has 31 car spaces. The applicant proposes to provide an additional 21 car spaces resulting in a total of 52 car spaces.

The LPA as parking authority will determine the appropriate level of parking for this proposal.

Disabled Parking

The applicant has not provided any information on the number of disabled parking bays.

However, as stated above, the LPA as parking authority will determine the appropriate level of parking for this proposal.

Car Parking Layout

The applicant has not provided adequate information for HCC to assess the car parking layout. Further information is required to ensure that the parking bays are adequate size. Additionally, the applicant will need to provide a swept path analysis of the car parking layout to justify that a standard sized vehicle can manoeuvre within the proposed car park.

Cycle Parking

There is proposed secure cycle storage for at least 1 cycle parking space per dwelling. This is consistent with the WBC cycling standards.

Accessibility

Bus Services

There is a bus stop located on Church Road approximately 165m from the site. This bus stop services route R8 to Watford.

Rail Services

The nearest railway station to the development site is Watford Junction, which is approximately 580m from the site.

Watford Junction has approximately 87 trains per day to and from London Euston. London Overground operates three services per hour, seven days a week, calling at all stations to London Euston via Watford High Street. Southbound trains depart between 05:11 and 23:21 Mondays to Saturdays and between 06:51 and 23:21 on Sundays; northbound trains arrive between 05:37 and 23:57 on Mondays to Saturdays and between 06:47 and 23:47 on Sundays.

Watford Junction thus has a wide range of rail services. There are also connections to Gatwick Airport and the south coast at Clapham Junction and to the northwest at Milton Keynes or Rugby.

Pedestrian Access

There are footways on both sides of Stratford Road. However, as stated above the applicant will need to provide further information to justify that the shared access is acceptable.

Cycle Access

There are no cycling infrastructure facilities in the immediate vicinity of the site.

Overall, the accessibility of the site is considered to be adequate for the proposal.

Travel Plan

A Travel Plan is not required for this level of development.

Construction

A condition has been put in place to ensure that construction vehicles do not impact the surrounding highway network.

Planning Obligations / Community Infrastructure Levy (CIL)

Watford Borough Council has a Community Infrastructure Levy, which was adopted in April 2015 and therefore, contributions towards local transport schemes will be sought via CIL if appropriate.

The TS does not contain any information regarding the potential impacts on the highway network during the construction of the proposed development. A Construction Traffic Management Plan should therefore be secured via a section 106 agreement.

Conclusion

Hertfordshire County Council (HCC) has no objection to the proposed development subject to suitable conditions.

Whilst the Local Highway Authority raised no objection to the proposal in their response, the applicant felt it was necessary to submit additional information to address those points raised by the Local Highway Authority regarding trip generation, visibility splays at the access and refuse vehicle turning. The applicant submitted additional information which was forwarded to the Local Highway Authority for comment. The Local Highway Authority provided the following comments dated 19.02.16:

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

HCC previously provided comments on the above application (reference: 15/01662/FULM). HCC had no objection to the proposal subject to the suitable conditions.

The applicant has since provided a response to the comments provided by HCC. Additionally, HCC were not aware a Transport Statement (TS) was submitted by the applicant at the time of providing their original comments. However, the applicant has since provided the TS dated November 2015 and this has been assessed in the below revised comments.

The following comments address the additional information provided by the applicant.

Trip Generation:

The site has previously been used as NHS Community Support Unit and would have historically generated some level of trips. However, the building is now vacant.

Prior to receiving the additional information, HCC stated that the applicant had not provided any information on how the proposal will impact the trip generation of the site. However, HCC stated that the proposal is unlikely to have a significant impact on the surrounding network and further analysis on trip generation and trip distribution is not required.

The applicant has provided additional information in the form of a TS. Since receiving the TS, HCC can confirm that the applicant has undertaken a TRICS assessment to determine the trip generation of the previous use of the site. As stated in the TS the TRICS assessment demonstrated that the previous use on the site was likely to generate 22 vehicle movements in the AM weekday peak (19 arrivals and 3

departures) and 19 vehicle movements in the PM weekday peak (5 arrivals and 14 departures), and a total of 293 daily vehicle movements (148 arrivals and 145 departures). The TRICS assessment also determined that the proposed use on the site is likely to generate 8 vehicle movements in the AM weekday peak (2 arrivals and 6 departures) and 8 vehicle movements in the PM weekday peak (5 arrivals and 3 departures), and a total of 82 daily vehicle movements (41 arrivals and 41 departures). The number of vehicle trips generated by the proposed development of 82 daily vehicle movements will be significantly lower than the previous use on the site which could have generated 293 daily vehicle movements.

This trip generation assessment is considered acceptable and as stated HCC did not have any concerns regarding trip generation in the original response.

Vehicle Access:

As part of pre-application advice provided to the applicant in September 2015, HCC noted that there appears to be problems with visibility at the existing entrance since a convex mirror has been fixed to the inside of the northern gatepost. HCC acknowledges that the access is an existing arrangement. However, the change of use of the site from employment to residential may result in an increase in two-way movement and also an increase of pedestrians sharing the access with vehicles.

As part of the comments provided to the applicant in December, HCC stated that the applicant had not addressed the comments provided during the pre-application stage. The proposed site plan indicates that pedestrians will share the access with vehicles and no visibility splays have been provided to justify that the access has clear site lines. HCC requested the applicant to provide further justification that the access can be safely shared by vehicles and pedestrians by providing visibility plays in accordance with the requirements set out in the Roads in Hertfordshire Highway Design Guide 3rd Edition.

The applicant has since provided additional comments regarding visibility splays. However, the additional comments provided by the applicant do not address the concerns raised by HCC. Additionally, the appendices provided in the TS do not include any visibility splays. Therefore, HCC maintain their original comments and conditions regarding visibility splays.

The applicant stated that the site layout provides a footway link on the northern side of the access to the existing footway within the highway to allow pedestrians entering or exiting the site a safe walking route. However, the site layout provided in the TS indicates that pedestrians and vehicles will have a shared access. Therefore, HCCs previous comments regarding access remain valid.

Swept Path Analysis:

HCC previously stated that the service road appears to be a private 'no through' road. As such, the applicant will need to provide further information in the form of a swept path analysis to justify that refuse vehicles have adequate space to manoeuvre within the site and also manoeuvre and exit the service road onto the highway in a forward gear. The swept path analysis provided in the TS (drawing TA001) is not adequate as it does not clearly show what size the vehicles are. The applicant has stated that a waste collection vehicle can safely drive into the site via the access point from Stratford Road and sufficient space is provided within the site for the refuse vehicle to turn and leave in forward gear. The turning head for the refuse vehicle and swept path analysis is shown on plans provided within the Transport Statement Appendices - Drawing Number TA001. However, drawing TA001 does not justify this as the analysis does not appear to incorporate the movement of a refuse vehicle.

Summary:

HCC previous did not object to the proposal subject to suitable conditions. The applicant has since provided additional information to address some of the issues raised in HCC's previous response. HCC have assessed the additional information and maintain that the previous response is still valid and therefore the conditions associated with the previous response should still be applied. These conditions have been listed below for ease of reference.

S106 Agreement:

A s106 Agreement will be required to secure any Construction Traffic Management Plan Planning Obligations.

Conditions:

Provision of Visibility Splays - Dimensioned in Condition:

Prior to the first occupation of the development hereby permitted (or Prior to the commencement of the use hereby permitted) a visibility splay measuring 2.4 x 43 metres shall be provided to each side of the access where it meets the highway and such splays shall thereafter be maintained at all times free from any obstruction between 600mm and 2m above the level of the adjacent highway carriageway.

Reason: In the interests of highway safety.

Provision of Parking and Servicing Areas:

SHC 21: Prior to the first occupation of the development hereby permitted (or Prior to the commencement of the use hereby permitted) the proposed servicing / loading, unloading / turning area shall be laid out, demarcated, levelled, surfaced and drained

in accordance with the approved plan and retained thereafter available for that specific use.

Reason: To ensure the permanent availability of the parking /manoeuvring area, in the interests of highway safety.

Construction Traffic (Parking):

SHC 25: Development shall not commence until a scheme detailing provision for on-site parking for construction workers for the duration of the construction period has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented throughout the construction period.

Reason: To ensure adequate off-street parking during construction in the interests of highway safety.

Wheel Cleaning Facilities - Temporary for Construction Vehicles

SHC 27A: No works shall commence on site until the details of wheel cleaning facilities for construction vehicles have been submitted to and approved in writing by the Local Planning Authority.

Reason: To prevent extraneous material being deposited on the highway.

5.8 Arboricultural Officer

The proposals indicate the loss of seven trees (T1- T6 and T13 on survey). Trees T1- T6 form part of Group G1 of TPO 83. These six trees are all of poor quality being either heavily suppressed or of low vitality many are ivy clad. Whilst they assist with the density of screening, much of which is due to the ivy and they are not the main screen and as such I do not have a strong objection to their removal: indicative replacement planting is shown. Whilst the parking court and block C fall outside the root protection areas (RPA) of the retained protected trees a path is shown to be constructed within it; this should be constructed using no- dig within the RPA

If permission is to be granted I would wish to see the following conditions attached:

Details of the construction of the path within the root protection area of retained trees shall be submitted and approved prior to work commencing on site.

Details of the type, height and location of tree protection fencing should be submitted and approved prior to work commencing on site.

A detailed landscaping scheme should be submitted and approved prior to work commencing on site.

A landscaping scheme was submitted during the course of the application. The Arboricultural Officer has provided the following comments on this:

The landscape proposals as shown on drawing No.LP/14SRWH/020 C and Appendix A are considered acceptable.

5.9 Lead Local Flood Authority (Hertfordshire County Council)

The comments of the Lead Local Flood Authority (LLFA) dated 22.12.15 are summarised below:

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

Reason

A drainage assessment is required under the NPPF for all Major Planning Applications as amended within the NPPG from the 6 April 2015.

A surface water drainage assessment is vital if the local planning authority is to make informed planning decisions. In the absence of a surface water drainage assessment, the flood risks resulting from the proposed development are unknown. The absence of a surface water drainage assessment is therefore sufficient reason in itself for a refusal of planning permission.

Overcoming our objection

We note that a geotechnical report has been submitted which includes ground conditions and infiltration tests. However no further information regarding drainage can be found on the planning portal.

The applicant can overcome our objection by undertaking a surface water drainage assessment which demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall and gives priority to the use of sustainable drainage methods, the SuDS hierarchy and management train. If this cannot be achieved we will consider whether there is a need to maintain our objection to the application.

Production of a surface water drainage assessment will not in itself result in the removal of an objection.

Our objection will be maintained until an adequate surface water drainage assessment has been submitted.

In light of the above objection, the applicant submitted additional information including a drainage strategy. The comments of the LLFA dated 25.01.16 are summarised below:

In response to the information provided by iDLimited reference IDL/780/DS/01 dated January 2016, this satisfactorily addresses the points raised in our previous response dated 22 December 2015. We can confirm that we the Lead Local Flood Authority are now in a position to remove our objection on flood risk grounds.

The proposed drainage strategy is based on attenuation and discharge. We note that infiltration is not feasible due to presence of solution features. The application is proposing to re-utilise the existing Thames Water surface water sewer connection on and providing betterment to surface water run-off rates. We acknowledge that Thames Water have been contacted and have no concerns with the connection at 5l/s.

Detailed surface water run-off calculations for 1:100 year (+30% CC) have been provided within the surface water drainage assessment, which ensures that the site has the capacity to accommodate all rainfall events up to 1:100 year (+30% CC).

Drawing no. IDL/780/DS/01 Rev A dated November 2015 has been provided with the drainage layout showing location of proposed SuDS schemes. We acknowledge the attenuation tanks and permeable paving to attenuate surface water before discharge into the existing surface water sewer.

We therefore recommend the following conditions to the LPA should planning permission be granted.

LLFA position

The proposed development will only meet the requirements of the National Planning Policy Framework if the following measure(s) as detailed in the surface water drainage assessment carried out by iDLimited reference IDL/780/DS/01 dated August 2015 submitted with this application are implemented and secured by way of a planning condition on any planning permission.

Condition

The development permitted by this planning permission shall be carried out in accordance with the approved surface water drainage assessment carried out by iDLimited reference reference IDL/780/DS/01 dated January 2016 and the following mitigation measures detailed within the FRA:

- 1. Implementing appropriate SuDS measures as indicated on drawing IDL/780/DS/01 Rev A dated November 2015.*
- 2. Providing attenuation to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + climate change event.*
- 3. Limiting the surface water run-off to 5l/s with discharge into Thames Water surface water sewer.*

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason

- 1. To prevent flooding by ensuring the satisfactory disposal of surface water from the site.*
- 2. To prevent flooding by ensuring the satisfactory storage of surface water from the site.*
- 3. To ensure surface water can be managed in a sustainable manner*
- 4. To reduce the risk of flooding to the proposed development and future occupants.*

Informative to the LPA

For further guidance on HCC's policies on SuDS, HCC Developers Guide and Checklist and links to national policy and industry best practice guidance please refer to our surface water drainage webpage

<http://www.hertsdirect.org/services/envplan/water/floods/surfacewaterdrainage/>

5.10 Hertfordshire County Council Development Services (regarding fire hydrant provision)

Based on the information provided to date for the demolition of the existing buildings and erection of four town houses and thirty four apartments, we would seek the provision of fire hydrant(s), as set out within HCC's Planning Obligations Toolkit. We

reserve the right to seek Community Infrastructure Levy contributions towards the provision of infrastructure as outlined in your R123 List through the appropriate channels.

A Section 106 legal agreement would be the County Council's preferred method of securing fire hydrants. If a Section 106 agreement is not otherwise anticipated for this development we would seek the inclusion of a condition to the planning permission.

5.11 Thames Water

Waste Comments

Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.

Surface Water Drainage

With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

Water Comments

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

5.12 Hertfordshire Constabulary Crime Prevention Design Service

1. I thank the applicants for addressing Crime Prevention in their Design and Access Statement (DAS). I am also pleased that ground floor defensible space for ground floor flats will be created as mentioned at part 5.4.1 of the DAS, and that the car parking areas will be suitably lit so as to deter crime and reduce any fear of crime.

2. Security – ADQ and SBD:

As of 1st October 2015, Approved Document Q (ADQ) has come in that requires under Building Regulations dwellings are built to "Prevent Unauthorised Access". This applies to any "dwelling and any part of a building from which access can be

gained to a flat within the building". Performance requirements apply to easily accessible doors and windows that provide access in any of the following circumstances:

- a. Into a dwelling from outside*
- b. Into parts of a building containing flats from outside*
- c. Into a flat from the common parts of the building*

Achieving the Secured by Design award meets the requirements of Approved Document Q (ADQ), and there is no charge for applying for the Secured by Design award. I would ask that this information is passed by way of informative to the applicant.

Secured by Design part 2 physical security: If the development were to be built to the physical security of Secured by Design part 2, which is the police approved minimum security standard and also achieves ADQ. This would involve:

- a. All exterior doors to have been certificated by an approved certification body to BS PAS 24:2012, or STS 201 issue 4:2012, or STS 202 BR2, or LPS 1175 SR 2, or LPS 2081 SR B. This includes any communal doors.*
- b. All individual flat front entrance doors to have been certificated by an approved certification body to BS Pas 24:2012 (internal specification).*
- c. Ground level exterior windows to have been certificated by an approved certification body to BS Pas 24:2012. All glazing in the exterior doors, and ground floor (easily accessible) windows next to or within 400mm of external doors to include laminated glass as one of the panes of glass.*
- d. Access control standard for flats at this development is audible, although I would encourage visual access control as well as the audible, because the flats are over three floors. Such access control must NOT have a Tradesman's Button fitted as this assists offenders to gain entry during the day to break into the flats.*

These standards are entry level security and meet the Secured by Design part 2 physical security standard. Building to the physical security of Secured by Design, which is the police approved minimum security standard, will reduce the potential for burglary by 50% to 75% and achieve ADQ. I would encourage the applicants to seek Secured by Design certification to this standard when it is built.

I hope the above is of use to you in your deliberations and will help the development achieve that aims of the National Planning Policy Framework (NPPF).

69 – re safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.

*& the National Planning Practice Guidance (NPPG) under 'Design'
010 – re Sec 17 of the Crime and Disorder Act 1984 – to prevent crime & disorder.
011 – re taking proportionate security measures being a central consideration to the
planning and delivery of new developments and substantive retrofits
& policy UD1 of Watford Core Strategy*

5.13 Housing Supply Manager

The Housing Supply Manager has confirmed no objection to the following mix of affordable housing provision:

- Shared ownership – 2 x 1-bed
- Social rent – 2 x 1-bed & 1 x 2-bed
- Affordable rent – 8 x 2-bed

5.14 Hertfordshire County Council Minerals & Waste Team

I am writing in response to the above planning application insofar as it raises issues in connection with minerals or waste matters. Should the borough council be minded to permit this application, a number of detailed matters should be given careful consideration.

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

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

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

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

bins, to facilitate a high quality, comprehensive and frequent household collection service;

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

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

- *Policy 1: Strategy for the provision for Waste Management Facilities (the penultimate paragraph only);*
- *Policy 2: Waste Prevention and Reduction;*
- *Policy 12: Sustainable Design, Construction and Demolition.*

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

Waste Policy 12: Sustainable Design, Construction and Demolition requires all relevant construction projects to be supported by a Site Waste Management Plan (SWMP). This aims to reduce the amount of waste produced on site and should contain information including types of waste removed from the site and where that waste is being taken to. Good practice templates for producing SWMPs can be found at: <http://www.smartwaste.co.uk/> or <http://www.wrap.org.uk/category/sector/waste-management>.

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

5.15 Planning Policy

In terms of the loss of the community use – there is no evidence supplied to consider this so I cannot comment other to say that this does need to be justified to satisfy policy CS3 and emerging HS11. In terms of the proposed use – the area is a residential one so in principle residential is acceptable; however, consideration should be given to the type of residential in terms of both housing type and tenure/mix. The advice given in the briefing note referred to the site being suitable for houses rather than

flats but a mix would be considered; however, the proposed mix is 5 houses and 37 flats so the houses are there as a token gesture rather than as a meaningful contribution to the provision of new houses. In additional consideration should be given to the provision of homes for older people or those with special needs – housing for older people is a growth area and this part of Watford would be very suitable for this type of housing. Clearly the scheme is required to provide affordable housing as well.

5.16 Urban Design & Conservation Manager

Layout:

Still have some concerns re the car parking arrangement which uses long continuous lines of spaces which don't appear to be broken up - it would be better to have breaks using tree planting as a structural device here. The scheme claims to be deriving its inspiration from the Salters Almshouses on the adjoining site. Whilst the arrangement in plan form has improved and does have a positive relationship with the Almshouses, the approach to a hierarchy of buildings across the site does not respond as well; the gatehouse concept works but the building heights apart from this buildings are consistent across the site unlike the Almshouses where there is a clear dominant and identifiable range which is taller. This gives the scheme a clear focal point which is lacking from the proposed application scheme. This could be addressed through reducing building heights on part of the proposed scheme for example, blocks A, B, E and F leaving C and D as the focal point in the centre of the site. Amendments could be made to the design of the elevations to give these sections more prominence as well.

Buildings:

The Stage 4 diagram in the D and A statement make it clear that the scheme makes heavy use of crowned roof form - I am not particularly happy with this and it results in a small roof which looks out of scale with the elevations - even with the lower eaves in places. It should be possible to remove the need for this approach on the townhouses and the gatehouse and on some of the narrower blocks. I note the argument made by the applicant regarding the crowned roof approach used on the extensions to the Salters Almshouses setting a precedent for this approach to be used here. There are a couple of points in relation to this ; the scale of the extensions to the almshouses is very different and it is unlikely that a similar approach would be granted consent today. It does not get away from the fact that on the taller elements of the proposed scheme the roof form does look out of scale with the building. The principal element of the Almshouses, the original buildings have an energy and dynamic in part generated by the steep roof pitches and gables along with features such as high chimneys, castellations, stepped gables, diaper brick patterns and use of stone dressing. The buildings in the application scheme seek to use some of these

features but do not maintain the energy and dynamism of the Almshouses. Suggested improvements are:

- *Where gables are used the building line should project slightly to create a stronger vertical emphasis through the elevation.*
- *The window type used across most of the elevations is more suited to the Victorian domestic vernacular than the gothic revival used on the Almshouses – the flat topped window form used on the Almshouses and in certain parts of the application scheme should be used throughout – this would give a stronger identity and character to the scheme which is currently lacking.*
- *The dressing technique used for the doors and windows should be altered to simple straight stone form rather than the curved brick soldier courses.*
- *Window materials should probably be metal and possibly black rather than white wooded ones – consider the use of diamond leading rather than the four pane at the top approach.*
- *There are some concerns regarding the chimneys – which do have a relevance in design terms but don't seem to have a function so there is an issue regarding building integrity.*

Town houses:

Symmetry: have reviewed the comments sent in as well including the examples given and would make the following points in relation to the comments:

- *Examples referred to are not really relevant to the building typology being promoted in the application scheme; many are two storey and are part of a longer street and do not have such a single dominant feature as the central wide gable being used here.*
- *The 3 storey examples provided are more relevant in that the building typology is more appropriate; but the examples used are not particularly good examples of three storey Victorian buildings and the features on them are not particularly successful; in particular, the large gables used which demonstrate that this is not really a successful feature for this type of building.*
- *If symmetry is to be used it needs to be reworked on these buildings and used to break down the scale – for example the larger central gable could be broken into two smaller gables which sit above a projecting bay.*

Other comments:

- *If the application scheme is seeking to use Victorian houses as the model then more attention to detailing is required and I would suggest that the eaves line of the roof*

needs to be dropped so that is it level with the bottom of the windows on the second floor as shown on the current drawings.

- *The dormers and windows on the second floor should be reduced in size – both height and width, so that they read as a subservient element to those on the main part of the elevation. The same ridge height could be achieved but a steeper pitch needed which would improve the design – the gables should have a lower ridge that the main roof. I think this would also result in a reduction of the crowned area.*
- *Comments above in relation to the windows on the main buildings should apply here as well.*
- *These changes would result in amore robust design.*
- *I still think we should avoid the integral garages - would on street spaces be sufficient - will the cars ever go in the garages?*

General Comments:

Care will be needed regarding the details and materials to be used – note suggestions regarding the window treatment, including the dressing. We will need detailed drawings for most features .

Even with the changes suggested which should result in a successful scheme on paper, there are concerns regarding whether it can be delivered with sufficient quality to be successful next to the Almshouses - materials are identified but not specified and we have no details which will make or break a scheme like this. There are elements to the design which are not the average and build costs will be higher as a result.

I think the best way to sum up is that I don't think this is ready to be determined yet - more work is needed and I would like to see more details at this stage - no landscape plan. I am not convinced that the housing mix is right for the location and I would have preferred a more innovative approach as we had with the houses on St Thomas church site.

6.0 APPRAISAL

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

- (a) *Watford Local Plan: Core Strategy 2006-31 (adopted January 2013);*
- (b) *the continuing “saved” policies of the Watford District Plan 2000;*
- (c) *the Hertfordshire Waste Core Strategy and Development Management Policies Document 2011-2026; and*

(d) the Hertfordshire Minerals Local Plan Review 2002-2016.

6.1 Principle of development

Loss of the community support centre

Up until recently, the site had provided a community support care home which was operated by the NHS. The site was vacated in February 2015 and the buildings now stand unoccupied.

6.2 Saved Policy CS3 of the Watford District Plan 2000 advises that the Council will not permit development resulting in the loss or downgrading of existing community facilities unless:

- (a) demand for such a facility is no longer sufficient to warrant its retention in its existing use, or as an alternative community facility; or
- (b) appropriate alternative accommodation is provided with comparable access to passenger transport.

This Policy requires that either (a) or (b) must be satisfied.

6.3 Policy HS1 of the Watford Local Plan Core Strategy 2006-31 also advises that factors that will go against residential allocation, and that will be considered in determining applications on windfall sites, will include, inter alia, community facilities for which there is still an identified need.

6.4 Subject to the aforementioned policies being satisfied then there would be no objection to the principle of residential development given that the site lies within a primarily residential area (as shown on the Watford District Plan 2000 Proposals Map).

6.5 The applicant has provided information which clarifies that the NHS services that were run from the subject site have been relocated as part of the Trust's rationalisation project. It is understood that the in-patient service that was provided on site has now been re-located to a purpose-built ward unit in Radlett and that the out-patient facility has now been relocated to Upton Road, Watford albeit on a smaller scale.

6.6 Based on the information provided it is also apparent that, prior to the disposal of the site, the property was placed on the NHS Trust's property register for a minimum of 40 days to enable other NHS Trusts or associated bodies to consider whether the property would be suitable for continued health care or similar uses. It is understood that no interest was received from any other healthcare organisation to use the

property for a continued healthcare use or the provision of associated services. This has been confirmed by the Property Manager at the Hertfordshire Partnership NHS Foundation Trust. The property was identified as being surplus to the Trust's requirements and was subsequently put up for sale on the open market. The Trust has also confirmed that no community user made a bid on the site.

6.7 It is considered that the information provided demonstrates that alternative accommodation has been provided elsewhere and that demand for such a facility is no longer sufficient to warrant its retention in its existing use. As such, it is considered that the loss of the community support centre for which there is no identified need and its replacement with residential development complies with the aims of Policy CS3 of the Watford District Plan 2000 and Policy HS1 of the Watford Local Plan Core Strategy 2006-31.

6.8 New residential development

The site lies within a primarily residential area within which redevelopment for residential use is acceptable in principle.

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

6.10 The proposal complies with the provisions of Policy HS1 in that the site occupies previously-developed land which is close to good public transport routes – being within easy reach of Watford Junction Station, bus stops and the Town Centre and its services. The site is also not in an area at risk of flooding, is not existing employment land or open space and does not have high biodiversity, landscape or cultural heritage significance. Whilst the proposal will result in the loss of a community facility, this is considered to be acceptable for the reasons already outlined in the section above.

6.11 Housing mix

Policy HS2 of the Watford Local Plan Core Strategy 2006-31 states that the Council will seek provision of a mix of housing types, sizes and tenures at a local level to meet

the requirements of all sectors of the community. Paragraph 8.2.7 states that the SHMA indicates a requirement for a mix of dwellings by size and tenure.

6.12 The application proposes 4 three bedroom houses, 30 two bedroom flats and 4 one bedroom flats, which is considered to be an acceptable housing mix. The proposal makes efficient use of the land and contributes towards the Borough's housing need in this respect.

6.13 Affordable Housing

Policy HS3 of the Watford Local Plan Core Strategy 2006-31 advises that "A rate of 35% affordable housing will be sought on major applications of 10 residential units and above or sites of more than 0.5 ha". The Policy states that the affordable housing provision should consist of 20% social rent; 65% affordable rent; and 15% shared ownership and further advises that "Only in exceptional circumstances will the council consider a lower level of affordable housing provision, where the developer can demonstrate exceptional planning, or other constraints on the development of the site through the submission of a development viability assessment".

6.14 Following discussions between officers and the applicant during the course of the application, the applicant has agreed to provide 35% affordable housing in line with the policy requirement. The following affordable housing provision will be provided:

- Shared ownership – 2 x 1-bed (15.4%)
- Social rent – 2 x 1-bed & 1 x 2-bed (23%)
- Affordable rent – 8 x 2-bed (61.5%)

6.15 The Council's Housing Supply Manager has confirmed that the tenure mix proposed is acceptable in terms of providing those types of units that are currently in demand. The affordable housing provision will be secured through the completion of a Section 106 agreement.

6.16 Design and impact on streetscene

Paragraph 58 of the NPPF advises that planning policies and decisions should aim to ensure that developments will function well and add to the overall quality of the area, respond to local character and history, and reflect the identity of local surroundings and materials. Section 7 (paragraph 64) of the NPPF further advises that "Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions".

6.17 Policy UD1 states that "new development should respect and enhance the local

character of the area in which it is located”. This is supported by Policy SS1 of the Watford Local Plan Core Strategy 2006-31 which states that “Outside of the areas covered by specific policies, the emphasis will be on making sure that new development protects residential amenity, protects and enhances the character of the area, maintains and enhances the quality of our open spaces and green infrastructure and protects our built heritage”.

6.18 At present, the site lies vacant and does not add value to the area. The existing building which is required to be demolished was built in the 1980s and is unexceptional in terms of its design and appearance. Consequently, its loss would not result in any harm to the character of the area subject to a suitable replacement scheme being secured. The existing building is neither statutory nor locally listed and the site is not within a Conservation Area. As such, the building could be demolished without consent (subject to the prior notification procedure being followed where necessary).

6.19 The design of the scheme has evolved since it was first put forward at the pre-application stage. The number of units proposed on the site has been reduced by 5 following concerns raised by officers during pre-application discussions. Amendments have also been made to the layout and design of the scheme and these have enhanced the proposal, resulting in a less cramped form of development.



Figure 3. Photograph of the front of the existing building.

- 6.20 The proposed development will consist of 2 pairs of three storey, semi-detached houses situated towards the rear (western end) of the site, 2 three storey blocks comprising 32 flats in total and configured around a central car park courtyard and a separate two storey building comprising 2 flats near to the entrance of the site (see Figure 2 above). The easternmost three storey block of flats will feature a projecting arm on its eastern side that will extend towards Stratford Road. This element will incorporate an undercroft that will allow vehicles to access a car parking area to its south.
- 6.21 The two storey building comprising 2 flats and referred to as “Block G” on the submitted plans has been designed to have the appearance of a gatehouse. It sits adjacent to the entrance, and, at two storeys, is lower than the other buildings included within the development. It is felt that its scale respects that of the nearest Salter’s Almshouse buildings immediately to the north of the site and allows a suitable transition between the single storey Almshouses and the proposed three storey blocks of flats.



Figure 4. Stratford Road streetscene



Figure 5. Site plan showing proposed blocks nearest to Stratford Road

6.22 The three storey blocks of flats occupy the central part of the site. The introduction of articulated components and varied elevational treatments, as well as the use of gable features, will help ‘break up’ the mass of the blocks of flats and ensure that visual relief across the elevations is provided. The projecting element on the easternmost block (referred to as “Block A” on the submitted plans) will run parallel with Block G but will sit on the southern side of the access road – helping to create a legible entrance into the site. It is considered that a suitable relationship between these two buildings (Blocks A and G) will be achieved because of the common design features that have been employed on both buildings.

6.23 The three storey blocks of flats will be set back a minimum distance of 10 metres from the front boundary of the site. This setback will ensure that the development does not have any overbearing impact on the streetscene. A combination of existing mature trees and new planting will run along the site frontage and this will help ensure that a high quality appearance is achieved when the site is viewed from the street. Furthermore, the existing brick wall which runs along the front boundary will

be retained – ensuring that the visual impact of the development on the streetscene is minimised.

6.24 The proposed houses will be setback over 95 metres from the front boundary of the site. By reason of their setback and siting behind the other blocks they will have no significant impact on the streetscene. The design of these houses has been revised during the course of the application to reflect concerns raised by the Conservation & Urban Design Officer. Their heights have also been reduced so as to reduce their scale and improve their proportions. It is considered that the design of the proposed houses will provide a high quality appearance that will suitably integrate with the other buildings on the site.

6.25 Impact on heritage assets

Policy UD2 of the Watford Local Plan Core Strategy 2006-31 states that “The council will ensure that the borough’s historic environment is identified, conserved, and, where appropriate, enhanced. This will include conservation areas, listed buildings, locally listed buildings, scheduled ancient monuments, archaeological remains and registered parks and gardens, and their settings”.

6.26 Section 12 of the NPPF makes clear that in determining planning applications, local planning authorities should take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness. In this particular case, the relevant ‘heritage assets’ are the Nascot Conservation Area which lies to the east of the site and the listed buildings to the north within the Salter’s Almshouses complex.

6.27 Impact on the setting of the Nascot Conservation Area

The site is not located within a Conservation Area but is within close proximity to the Nascot Conservation Area which has its boundary along the eastern side of Stratford Road opposite the site.

6.28 The existing building that stands on the site is relatively modern and fails to respect the Victorian character that prevails within the area. It does not contribute positively to the area and its loss would cause no undue harm to the character of the Conservation Area.

6.29 High quality materials will be used for the external finishes of the new buildings and these will be secured by condition. The use of appropriate materials will ensure that

the development integrates harmoniously with its surroundings and respects the character of the Conservation Area.

6.30 Many of the trees on site will be retained and the existing wall that runs along the front boundary will also be retained as previously mentioned. The retention of these features will help minimise the impact of the works on the character of the area.

6.31 Impact on the setting of the nearby listed buildings

There are no locally or statutory listed buildings encompassed within the site. However, to the north of the site a complex of 19th century Grade II listed buildings, known as the Salter's Almshouses (1-35 Salter's Gardens) exists. These almshouses were built in a gothic style.

6.32 The new buildings have been designed to incorporate traditional design features including some that take their cues from the older buildings within the area. Whilst the development will increase the amount of built form on site when compared to that which exists at present, it will, nevertheless, provide more of a sympathetic design approach to the Salter's Gardens complex than that which is offered by the subject site at present. In addition, there will be clear separation provided between the new buildings and the listed parts of the Salter's Gardens complex. As a result, it is considered that the setting of the nearby listed buildings will remain unharmed by the proposal.

6.33 Layout

The floor areas and room sizes of the proposed houses and flats meet the Nationally Described Space Standard and, as such, it is considered that a suitable amount of living space will be provided in each of the properties. Furthermore, all habitable rooms will be provided with natural light and outlook so as to ensure that a satisfactory living environment is provided.

6.34 The majority of the proposed units will have living room windows that face in a southerly direction. As such, a good proportion of the units will receive sunlight for a part of the day. The northern elevation of the building is prominent because of its position adjacent to, and facing, the car parking courtyard, therefore it would not be appropriate to have only non-habitable windows such as bathrooms and stairwells on this elevation as it would affect the appearance and of the frontage.

6.35 Paragraph 7.3.23 of the RDG states that for flatted developments, communal open space provided for the exclusive use of occupants of the development may be acceptable as long as its location, size and shape enable it to be enjoyed by the occupants. The minimum area for usable communal space is 50 square metres, plus

15 square metres per additional unit over two units. Therefore, for 34 flats the private garden space standard is 530 square metres. The proposed communal garden area exceeds 530 square metres in area and provides an acceptable level of amenity space for the occupiers of the flats.

6.36 Paragraph 7.3.22 of the RDG advises that a minimum garden area of 65 square metres of private amenity space should be provided for a 3 bedroom house. The proposed gardens at the rear of each of the proposed houses will all exceed 65 square metres in area and will provide a usable and appropriately-sized private amenity space for the occupiers of the houses.

6.37 The proposed development would provide an acceptable level of privacy for future occupants. A minimum distance of 22m will be provided between the windows on the opposing blocks of flats situated either side of the central car park courtyard. Such separation will meet the privacy distance for new build development set out in the RDG. The distance between the western side of Blocks E and F and the front elevations of the houses will be 19m. This is considered to be a suitable separation distance between buildings on either side of the driveway and would not be dissimilar to that found between the front elevations of properties on opposite sides of a typical street.

6.38 The submitted drawings show provision of purpose-built bin stores to serve the blocks of flats. It is felt that such provision will ensure that adequate refuse and recycling storage, to meet the demands of the development, will be accommodated without causing harm to the amenities of future occupiers of the development or neighbours and without compromising the appearance of the site, the streetscene or the character of the area, in accordance with Policy SE7. Further details of the exact siting, size and finish of the external bin stores will be secured by condition should the application be approved so as to ensure that receptacles are kept in a tidy manner in contained enclosures that are designed to minimise any odours or other amenity issues.

6.39 Impact on neighbouring properties

It is considered that the proposed development will have no detrimental impact on the amenities of neighbours. The proposed buildings will be sited a sufficient distance from the nearest neighbouring buildings so as not to result in any overbearing impacts on them or cause a heightened sense of enclosure within neighbouring gardens. Additionally, it is felt that neighbouring properties will continue to benefit from suitable levels of natural light and outlook should the development be implemented.

- 6.40 It is acknowledged that those buildings within the Salter's Gardens complex that are located nearest to the subject site feature windows that face towards the site. However, these windows do not appear to be relied upon to provide the main source of light and outlook to habitable rooms. It is considered that the habitable areas within these properties will continue to benefit from suitable levels of natural light and outlook and the living environment of their occupiers will not therefore be adversely affected by the proposal.
- 6.41 The scheme has been designed to minimise any potential overlooking into neighbouring properties through the careful placement of its habitable room windows. As a result of this, the proposed development will not result in any significant privacy issues.
- 6.42 The proposed blocks to be sited nearest to the Prince Michael of Kent Court complex (located to the south of the site) will feature a number of windows at ground, first and second floor levels. However, those nearest windows that will directly face the neighbouring building will serve non-habitable rooms or act as secondary sources of light thereby allowing them to be fitted with obscure glazing.
- 6.43 Whilst the proposed houses will feature windows in their flank elevations, these will serve non-habitable rooms including garages and bathrooms and as such, there is no reason why these cannot be fitted with obscure glazing so as to prevent any potential overlooking into neighbouring properties. Such obscure glazing could be secured by condition.
- 6.44 Block G features no windows in its northeast-facing elevation and therefore no direct views into the Salter's Gardens complex will be afforded from this building.

6.45 Access, parking and transportation

6.46 Access

The Local Highway Authority has been consulted and has raised no objection to the proposal on highways grounds subject to conditions requiring that visibility splays be provided either side of the access, the parking and servicing areas be laid out prior to occupation of any of the units and the submission of a scheme detailing the provision of on site parking and wheel cleaning for contractor's vehicles during construction works.

- 6.47 The site is currently served by a single vehicular access on the Stratford Road frontage. This established access will be retained and utilised to serve the proposed development. The requirement for visibility splays to be provided by condition, as recommended by the Local Highway Authority, does not appear to be justified in this

case given that the proposal will not significantly intensify the use of the access (see 'Traffic generation' section below) and also taking into account that Stratford Road is unclassified and that movements on the road are relatively low.

6.48 Traffic generation

The Transport Statement submitted with the application includes figures on the likely trip generation created by the development. These have been compared to those generated by the existing use. As set out within the Transport Statement, the existing use of the site was likely to generate 22 vehicle movements in the AM weekday peak (19 arrivals and 3 departures) and 19 vehicle movements in the PM weekday peak (5 arrivals and 14 departures), and a total of 293 daily vehicle movements (148 arrivals and 145 departures). The assessment determines that the proposed residential use on the site is likely to generate 8 vehicle movements in the AM weekday peak (2 arrivals and 6 departures) and 8 vehicle movements in the PM weekday peak (5 arrivals and 3 departures), and a total of 82 daily vehicle movements (41 arrivals and 41 departures). The number of vehicle trips generated by the proposed development of 82 daily vehicle movements will be significantly lower than the existing community centre use which could have generated 293 daily vehicle movements. In light of this information, it is considered that the proposal is unlikely to result in any significant increase in traffic or congestion on the surrounding highway network.

6.49 Car parking provision

Appendix 2 of the Watford District Plan 2000 states that in Zone 3 of the Car Parking Zones Map the maximum parking standards for 1, 2 and 3 bedroom dwellings are 1.25, 1.5 and 2.25 spaces respectively. The application proposes 52 parking spaces, which complies with the maximum parking standard of 59 spaces. The site is in a sustainable location close to passenger transport facilities at Watford Junction and shops and services in the town centre, therefore the amount of on-site parking is acceptable.

6.50 The application site is located in the Central/West Watford Controlled Parking Zone, therefore, in accordance with "Saved" Policy T24 of the Watford District Plan 2000, it is necessary to complete a Section 106 Planning Obligation to remove permit entitlement for future occupants of the proposed dwellings. The owner of the site has shown a willingness to enter into a legal agreement to amend the Traffic Order and this will ensure that future occupiers of the development will not be entitled to parking permits within the surrounding controlled parking zones (CPZs). This measure will help to ensure that the scheme will not result in any significant increase in on-street parking on surrounding roads.

6.51 Refuse collection

The Local Highway Authority has raised concerns relating to the manoeuvring of refuse collection vehicles on site. Despite this, they have not recommended that the application be refused or that further information be submitted regarding this. It should be borne in mind that Stratford Road is an unclassified road and movements on the road are relatively low. As such, it is unlikely that refuse vehicles would conflict with vehicles and pedestrians. In any case, there would appear to be enough space within the site to allow a refuse vehicle to manoeuvre and turn around so that it can enter and egress the site in a forward gear.

6.52 Cycle storage

Cycle storage will be provided by way of internal and external purpose-built storage enclosures. Such provision will be secure and weatherproof, and conveniently located for the occupiers of the units, in accordance with the requirements of Policy T10 of the Watford District Plan 2000. Further details of the exact siting, size and finish of the stand-alone cycle storage enclosures will be secured by condition.

6.53 Trees and landscaping

There are a number of mature trees within the site – some of which are protected by Tree Preservation Order No. 83. These protected trees are located within the southeastern corner of the site and along part of its Stratford Road frontage.

6.54 The proposals indicate the loss of seven trees (T1- T6 and T13 on survey). Trees T1- T6 form part of Group G1 of TPO 83. The Council's Arboricultural Officer has confirmed that these trees are all of poor quality being either heavily suppressed or of low vitality. He has also noted that many are ivy clad. It is acknowledged that these trees assist with the density of screening (much of which is due to the ivy), however, they are not the main screen and, as such, there is no strong objection to their removal. Moreover, replacement planting will help compensate for the loss of the trees.

6.55 Whilst the parking court and Block C fall outside the root protection areas (RPA) of the retained protected trees, a path is shown to be constructed within it. The Arboricultural Officer recommends that this be constructed using no-dig methods within the RPA so as to protect the health of retained trees and this can be secured by condition.

6.56 A landscaping scheme has been submitted during the course of the application. The Arboricultural Officer considers this scheme to be acceptable. The proposed landscaping will provide the opportunity for some replacement trees to be planted and new planting to be carried out that will help create an attractive environment.

6.57 Flood risk and sustainable drainage

A surface water drainage strategy has been submitted with the application which sets out measures to manage surface water and consequently reduce the risk of flooding both within the site and on adjacent land.

6.58 The Local Lead Flood Authority (LLFA) has been consulted and has confirmed that the proposal is satisfactory in principle from a strategic drainage point of view.

6.59 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.

6.60 The CIL charge applicable to the proposed development is £120 per sqm.

6.61 The charge is based on the net increase of the gross internal floor area of the proposed development. Exemptions can be sought for charities, social housing and self-build housing.

6.62 In accordance with s.70 of the Town and Country Planning Act 1990, as amended by s.143 of the Localism Act 2011, a local planning authority, in determining a planning application, must have regard to any local finance consideration, so far as material to the application. A local finance consideration is defined as including a CIL charge that the relevant authority has received, or will or could receive. Potential CIL liability can therefore be a material consideration and can be taken into account in the determination of the application.

6.63 Section 106 planning obligation

The proposed development is one where affordable housing should be provided, in accordance with saved Policy H16 of the Watford District Plan 2000 and Policy HS3 of the Watford Local Plan Core Strategy 2006-31.

6.64 The development proposed in this application is also one where, in accordance with saved Policy T26 of the Watford District Plan 2000 and Policy INF1 of the Watford Local Plan Core Strategy 2006-31, the Council will normally require the applicant to enter into a planning obligation which provides for a financial contribution towards

the variation of the Borough of Watford (Watford Central Area and West Watford Area) (Controlled Parking Zones) (Consolidation) Order 2010 to exclude future residents of the development from entitlement to resident parking permits for the controlled parking zones in the vicinity of the application site. It is necessary to amend the traffic order so as to exclude the occupiers of the development from any entitlement to claim permits for the local Controlled Parking Zone because otherwise the proposed development would be likely to give rise to additional vehicles parking on local streets, thus worsening traffic congestion which would be a reason to refuse planning permission.

- 6.65 In addition, the proposed development is one where Hertfordshire County Council, in pursuance of its duty as the statutory Fire Authority to ensure fire fighting facilities are provided on new developments and that all dwellings are adequately served by fire hydrants in the event of fire, seeks the provision of hydrants required to serve the proposed buildings by means of a planning obligation. The requirements for fire hydrant provision are set out within the County Council's *Planning Obligations Toolkit* document (2008) at paragraphs 12.33 and 12.34 (page 22). In practice, the need for hydrants is determined at the time the water services for the development are planned in detail and the layout of the development is known, which is usually after planning permission is granted. If, at the water scheme design stage, adequate hydrants are already available no extra hydrants will be needed.
- 6.66 Under Regulation 122 of the Community Infrastructure Levy Regulations 2010, where a decision is made which results in planning permission being granted for development, a planning obligation may only constitute a reason for granting planning permission for that development if the obligation is:
- necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development.
- 6.67 The provision of affordable housing is directly related to the proposed development, and is fairly and reasonably related in scale and kind to that development. It is also necessary to make the development acceptable in accordance with the Council's planning policies.
- 6.68 The contribution sought by the Council for amending the Controlled Parking Zones Traffic Regulation Order varies according to the number of dwellings existing and to be created and according to the existing use of the property. The contribution is thus directly related to the proposed development and is fairly and reasonably related in scale and kind to that development. It is also necessary to make the development

acceptable in accordance with the Council's planning policies.

6.69 As the County Council's requirement for the provision of fire hydrants accords with the provisions of the *Planning Obligations Toolkit*, this obligation is also directly related to the proposed development and is fairly and reasonably related in scale and kind to that development. It is also necessary to make the development acceptable in accordance with the County Council's statutory duty as the Fire Authority.

6.70 Accordingly, the provision of affordable housing, the contribution sought by the Council towards the amendment of the Controlled Parking Zones Traffic Regulation Order and the County Council's requirement for fire hydrants meet the tests in Regulation 122 of the Community Infrastructure Regulations 2010, and, consequently, these planning obligations can be taken into account as material planning considerations in the determination of the application. Both the Council's approach to seeking affordable housing provision and a financial contribution and the County Council's approach to seeking the provision of fire hydrants by means of planning obligations are also fully in accordance with the advice set out in paragraphs 203 to 205 of the National Planning Policy Framework.

6.71 Consideration of objections received

Eleven objections have been received and these are summarised in the 'Consultations' section of the report above. Most of the issues raised have been discussed in the 'Appraisal' section. However, those issues that have not already been referred to, or which require further discussion, are outlined in the table below.

Objections	Officer's response
Strain/increased demand on local services such as schools and doctors surgeries, utilities, green space, infrastructure and residents.	The development is CIL liable. The CIL contribution collected from this development will be used to offset the impacts of the development on local services and infrastructure.
Impact on crime.	The Crime Prevention Design Advisor at Hertfordshire Constabulary has been consulted and has raised no objection to the proposal in terms of its impact on crime or on security grounds. It should be noted that the physical security aspects of Secured By Design are now incorporated as a mandatory requirement of the building regulations. They are therefore covered by

	<p>other legislation and this does not need to be considered under the planning system. Conditions will be attached to any permission to ensure that further details of external lighting and means of enclosures are submitted for approval.</p> <p>It is also acknowledged that the site lies vacant at present and could attract anti-social behaviour in its current form. The unoccupied site offers no natural surveillance and the new development will bring the site back into use and ensure that an element of natural surveillance is re-introduced.</p>
<p>Noise, dirt, heavy vehicles and disruption during works.</p>	<p>The developer will be required to submit a Construction Environmental Management Plan should permission be granted. This would be secured by condition (see “Conditions” below) and would require details of measures to be put in place during the construction of the development to minimise dust and other construction-related issues.</p> <p>The site is located in an urban area, where a degree of traffic and activity and its associated noise is to be expected. A condition will be attached to any permission granted to restrict the hours in which the development can be constructed, so as to limit the noise and disturbance to neighbouring residential properties.</p>
<p>Development will be between 2 elderly people’s homes and peace and quiet will be lost.</p>	<p>The residential development will remain compatible with the surrounding residential uses. The scheme does not seek to create any industrial use or plant or equipment that is likely to result in noise disturbance.</p>

<p>Will create a precedent; allowing future 3 storey buildings in a predominantly 2 storey low density area.</p>	<p>The scale and massing of the buildings is considered to be appropriate for the site's context. Within the area, there is a varied built form that includes 3 storey blocks of flats directly opposite the site and to its northwest (The Spinney). The development has been considered on its own individual merits based on its relationship with the surrounding properties and would not set a precedent for inappropriate development to be carried out elsewhere.</p>
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7.0 CONCLUSION

- 7.1 The proposal seeks to provide a high quality residential scheme that will make an efficient use of this brownfield site. The proposed units will exceed the minimum space standards and will benefit from adequate levels of on-site amenity space ensuring that a satisfactory living environment is provided. In addition, adequate on-site car parking and cycle storage will be provided to meet the demands of the development. The owner of the site has shown a willingness to enter into a Unilateral Undertaking to prevent future residents of the development from being entitled to parking permits and this will help prevent any significant increase in on-street parking on the surrounding roads.
- 7.2 The proposed design, scale and layout of the development respects the character of the area and the surrounding built form including the listed buildings to the north. It is felt that no harm will be caused to any of the surrounding heritage assets.
- 7.3 Of the 38 units proposed, 13 are to be affordable – ensuring that the level of affordable housing provision meets the Council's minimum 35% threshold. The proposed tenure and size of the units will ensure that a suitable mix of housing is provided for a location of this type.

8.0 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. With regard to any infringement of third party Human Rights, these are not considered to be of such a nature and degree as to override the Human Rights of the applicant and therefore warrant refusal of planning permission.

9.0 RECOMMENDATION

- (A) 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 13 of the units as affordable housing for social rent, affordable rent and intermediate tenure.
- ii) To exclude future residents of the development from entitlement to resident parking permits for the controlled parking zones in the vicinity of the application site.
- iii) To secure the provision of fire hydrants as required by the County Council to serve the development.

That planning permission be granted subject to the following conditions:

Time Limit

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

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

Approved Drawings

2. The development hereby permitted shall be carried out in accordance with the following approved drawings: 200 Rev P2 – amended plan received 20.01.16; 16 001-1; 203 Rev P4 – amended plan received 03.03.16; 204 Rev P4 – amended plan received 03.03.16; 205 Rev B – amended plan received 18.03.16; 206 Rev P1; 207 Rev P4 – amended plan received 03.03.16; 208 Rev P4 – amended plan received 03.03.16; 209 Rev P4 – amended plan received 03.03.16; 05-400 Rev P – amended plan received 14.04.16; 05-401 Rev P – amended plan received 05.04.16; 05-402 Rev P – amended plan received 05.04.16; 05-403 Rev P – amended plan received 05.04.16; 05-404 Rev P – amended plan received 05.04.16; 05-405 Rev P – amended plan received 05.04.16; LP/14SRWH/020 C.

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

Hours of Construction

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

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

External Materials and Detailing

4. No construction works shall commence until details of the materials to be used for all the external finishes of the buildings, including all walls, roofs, doors, windows, balconies, fascias, soffits, rainwater and foul drainage goods (including samples where considered necessary by the Local Planning Authority) have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out only in accordance with the approved materials.

Reason: In the interests of the visual appearance of the site and the character and appearance of the area, in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31. This is a pre-commencement condition as the materials need to be approved by the Local Planning Authority before the development is constructed.

5. No construction works shall commence until detailed drawings of the elevations including the window reveal treatment and window dressing technique to be used have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out only in accordance with the approved details.

Reason: In the interests of the visual appearance of the site and the character and appearance of the area, in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31. This is a pre-commencement condition as the finishing need to be approved by the Local Planning Authority before the development is constructed.

Surface Water Drainage

6. The development permitted by this planning permission shall only be carried out in accordance with the approved surface water drainage assessment carried out by iDLimited reference IDL/780/DS/01 dated January 2016 and the following mitigation measures detailed within the assessment:

1. Implementing appropriate SuDS measures as indicated on drawing IDL/780/DS/01 Rev A dated November 2015.
2. Providing attenuation to ensure no increase in surface water run-off volumes for all rainfall events up to and including the 1 in 100 year + climate change event.
3. Limiting the surface water run-off to 5l/s with discharge into Thames Water surface water sewer.

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

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

Soft Landscaping

7. The soft landscaping shall be carried out in accordance with the details shown on Drawing No. LP/14SRWH/020 C and as set out in the accompanying document Appendix A – Landscape Plan (prepared by David Clarke). The proposed planting shall be completed not later than the first available planting and seeding season after the first occupation of any part of the development. For the purposes of this condition a planting season is the period from 1 October in any one year to 31 March in the next following year. Any trees or plants whether new or existing which within a period of five years die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, or in accordance with details approved in writing by the Local Planning Authority.

Reason: In the interests of the visual appearance of the site in accordance with Policy SE36 of the Watford District Plan 2000 and Policies SS1 and UD1 of the Watford Local Plan Core Strategy 2006-31.

Hard Landscaping

8. Notwithstanding the information shown on Drawing No. LP/14SRWH/020 C and as set out in the accompanying document Appendix A – Landscape Plan (prepared by David Clarke), no part of the development shall be occupied until full details of a hard landscaping scheme, including details of all hard surfacing, all site boundary treatments and all fencing or enclosures within the site, have been submitted to

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

Reason: In the interests of the visual appearance of the site in accordance with Policies SS1 and UD1 of the Watford Local Plan Core Strategy 2006-31.

Tree protection measures

9. No works to create the pathways within the site shall commence until details of the construction methods to be used for those parts of the proposed paths that lie within the root protection areas of retained trees have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out only in accordance with the details approved under this condition.

Reason: To safeguard the health and vitality of the existing trees which represent an important visual amenity during the period of construction works in accordance with Policies SE37 and SE39 of the Watford District Plan 2000.

10. No works shall commence until details of the type, height and location of tree protection fencing have been submitted to and approved in writing by the Local Planning Authority. The approved tree protection fencing shall be installed prior to the commencement of any demolition or construction works on site and shall be maintained as such at all times throughout the period of construction.

Reason: To safeguard the health and vitality of the existing trees which represent an important visual amenity during the period of construction works in accordance with Policies SE37 and SE39 of the Watford District Plan 2000. This is a pre-commencement condition as these measures need to be put in place prior to any works commencing in order to provide the necessary protection for the retained trees.

11. Details of all below ground services and cabling (electricity, gas, telephone, foul water, surface water, etc), including any temporary connections for site huts showing depth, width and routing of all trenches shall be submitted to and approved in writing by the Local Planning Authority prior to any works commencing on site. The development shall be carried out only in accordance with the details approved under this condition .

Reason: To safeguard the health and vitality of the existing trees which represent an important visual amenity during the period of construction works in accordance with Policies SE37 and SE39 of the Watford District Plan 2000. This is a pre-commencement condition as these measures need to be put in place prior to any

works commencing in order to provide the necessary protection for the retained trees.

Car parking, manoeuvring and driveway provision

12. No part of the development shall be occupied until the car parking, manoeuvring and driveway areas have been laid out and constructed in accordance with the approved drawings and made available for use and these facilities shall thereafter be kept clear of any obstruction and not be used for any other purposes.

Reason: To ensure adequate parking facilities are provided on the site and to ensure that the proposed development does not prejudice the free flow of traffic or public safety along the adjoining highway, in accordance with Policies T21 and T24 of the Watford District Plan 2000.

Levels

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

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

Construction Environmental Management Plan

14. No demolition or construction works shall commence within the site until a Construction Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority. This Plan shall include details of temporary access for demolition/construction vehicles, contractors' parking, the delivery and storage of materials, measures to mitigate noise and dust, wheel washing facilities, plant and equipment and a contact procedure for complaints. The Plan as approved shall be implemented throughout the relevant demolition and construction periods.

Reason: To safeguard the amenities and quiet enjoyment of neighbouring properties and prevent obstruction of the adjoining highway during the time that the development is being constructed, pursuant to Policies T24 and SE22 of the Watford District Plan 2000. This is a pre-commencement condition as these details need to be agreed with the Local Planning Authority before the works commence.

No new gates

15. With the exception of the means of enclosure approved under Condition 8, no gates or other means of enclosure shall be erected along the site frontage across the vehicle access or elsewhere on the site without the prior written approval of the Local Planning Authority.

Reason: To minimise danger, obstruction and inconvenience to users of the adjacent highway and in the interests of visual amenity, in accordance with Policies T21 and T24 of the Watford District Plan 2000 and Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

Obscure glazing

16. The following windows shall be permanently fixed closed below 1.7m internal floor level and shall be fitted with obscured glass at all times unless otherwise agreed in writing by the Local Planning Authority:

- (i) The proposed first and second floor windows on the northeast-facing elevation of the building referred to as Block B (serving the flats referred to as 10 and 12) on the drawings hereby approved;
- (ii) The proposed first and second floor windows on the northeast-facing elevation of the building referred to as Block F (serving the flats referred to as 32 and 34) on the drawings hereby approved;
- (iii) The proposed windows on the southwest-facing elevation of the building referred to as Block G (serving the flats referred to as 1 and 2) on the drawings hereby approved;
- (iv) The proposed first and second floor windows on the northeast-facing and southwest-facing elevations of the houses;
- (v) The proposed first and second floor windows on the southwest-facing and northwest-facing elevations of the stairwell attached to the southern side of the building referred to as Block E on the drawings hereby approved;

Reason: To prevent overlooking and consequent loss of privacy to the occupiers of the neighbouring properties pursuant to the provisions of the Residential Design Guide (RDG) and Policy SS1 of the Watford Local Plan Core Strategy 2006-31.

External Lighting

17. None of the units hereby approved shall be occupied until a scheme detailing the external lighting to be installed within the site (including any external lighting attached to the buildings) has been submitted to and approved in writing by the Local Planning Authority. The lighting shall be installed, as approved, prior to the first occupation of the development and shall be maintained as such at all times thereafter unless otherwise agreed in writing by the Local Planning Authority.

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

Removal of Permitted Development Rights

18. Notwithstanding the provisions of Article 3 of the Town and Country Planning (General Permitted Development) Order 2015, as amended (or any modifications or re-enactment thereof), no development permitted under Schedule 2, Part 1, Classes A, B, C, D, E, F and G of the Order shall be carried out to the dwellings hereby approved without the prior written permission of the Local Planning Authority.

Reason: To enable the Local Planning Authority to ensure that any such developments are carried out in a manner which will not be harmful to the character and appearance of the site and its surroundings and will not prove detrimental to the amenities of residents in accordance with Policies SS1 and UD1 of the Watford Local Plan Core Strategy 2006-31.

No garage conversions

19. The garages hereby permitted shall be reserved for the parking of vehicles and shall not be converted to provide additional living accommodation or used for any other purpose.

Reason: To ensure that adequate and satisfactory provision is made for the garaging and parking of vehicles clear of all carriageways in accordance with Policy T22 of the Watford District Plan 2000.

Contamination

20. Prior to the commencement of the development hereby approved a Phase I Report to assess the actual or potential contamination at the site shall be submitted to and approved in writing by the Local Planning Authority. If actual or potential contamination and/or ground gas risks are identified further investigation shall be carried out and a Phase II report shall be submitted to and approved in writing by

the Local Planning Authority prior to the commencement of the development. If the Phase II report establishes that remediation or protection measures are necessary a Remediation Statement shall be submitted to and approved in writing by the Local Planning Authority.

For the purposes of this condition:

A Phase I Report consists of a desk study, site walkover, conceptual model and a preliminary risk assessment. The desk study comprises a search of available information and historical maps which can be used to identify the likelihood of contamination. A simple walkover survey of the site is conducted to identify pollution linkages not obvious from desk studies. Using the information gathered, a 'conceptual model' of the site is constructed and a preliminary risk assessment is carried out.

A Phase II Report consists of an intrusive site investigation and risk assessment. The report should make recommendations for further investigation and assessment where required.

A Remediation Statement details actions to be carried out and timescales so that contamination no longer presents a risk to site users, property, the environment or ecological systems.

Reason: To ensure that the issue of contamination is adequately addressed and to ensure a satisfactory development.

21. All remediation or protection measures identified in the Remediation Statement referred to in Condition 20 shall be fully implemented within the timescales and by the deadlines as set out in the Remediation Statement and a Site Completion Report shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of any part of the development hereby permitted.

For the purposes of this condition a Site Completion Report shall record all the investigation and remedial or protection actions carried out. It shall detail all conclusions and actions taken at each stage of the works including validation work. It shall contain quality assurance and validation results providing evidence that the site has been remediated to a standard suitable for the approved use.

Reason: To ensure that the issue of contamination is adequately addressed and to ensure a satisfactory development.

INFORMATIVES:

1. In dealing with this application, Watford Borough Council has considered the proposal in a positive and proactive manner having regard to the policies of the development plan as well as paragraphs 186 and 187 of the National Planning Policy Framework and other material considerations, and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015.
2. The proposed development is liable for contributions under the Community Infrastructure Levy (CIL). Please contact the Planning Support Team at Watford Borough Council (telephone number: 01923 278327) if you have any queries about the CIL procedure and how CIL payments are collected.
3. This planning permission is accompanied by a Planning Obligation under Section 106 of the Town and Country Planning Act 1990 to secure the provision of 13 affordable housing units; to exclude future residents of the development from entitlement to resident parking permits for the controlled parking zones in the vicinity of the application site; and to secure the provision of fire hydrants as required by the County Council to serve the development.
4. The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence. Further information is available via the Hertfordshire County Council website at <http://www.hertsdirect.org/services/transtreets/highways/> or by telephoning 0300 1234047.
5. Before commencing the development the applicant shall contact Hertfordshire County Council Highways (0300 123 4047) to obtain i) their permission/ requirements regarding access for vehicles involved in the construction of the development; ii) a condition survey of any adjacent highways which may be affected by construction vehicles together with an agreement with the highway authority that the developer will bear all costs in reinstating any damage to the highway.
6. All new units granted planning permission and to be constructed require naming or numbering under the Public Health Act 1925. You must contact Watford Borough Council Street Naming and Numbering department as early as possible prior to

commencement on streetnamenumbers@watford.gov.uk or 01923 278458. A numbering notification will be issued by the council, following which Royal Mail will assign a postcode which will make up the official address. It is also the responsibility of the developer to inform Street Naming and Numbering when properties are ready for occupancy.

7. With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777.
8. With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company, The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

(B) In the event that an acceptable planning obligation under Section 106 of the Town and Country Planning Act 1990 has not been completed by 18th August 2016 in respect of the Heads of Terms set out above, the Development Management Section Head be authorised to refuse planning permission for the application for the following reasons:

1. The proposal fails to make provision for affordable housing on-site and as such is contrary to Policy HS3 of the Watford Local Plan Core Strategy 2006-31.
2. The proposal would exacerbate demand for on-street parking in the Controlled Parking Zone, which already experiences parking problems. The proposal is therefore contrary to saved Policy T24 of the Watford District Plan 2000.
3. The proposal fails to make provision for fire hydrants to serve the development and as such is contrary to Policy INF1 of the Watford Local Plan Core Strategy 2006-31 and saved Policy H10 of the Watford District Plan 2000.

Drawing Numbers

200 Rev P2 – amended plan received 20.01.16

16 001-1
203 Rev P4 – amended plan received 03.03.16
204 Rev P4 – amended plan received 03.03.16
205 Rev B – amended plan received 18.03.16
206 Rev P1
207 Rev P4 – amended plan received 03.03.16
208 Rev P4 – amended plan received 03.03.16
209 Rev P4 – amended plan received 03.03.16
05-400 Rev P – amended plan received 14.04.16
05-401 Rev P – amended plan received 05.04.16
05-402 Rev P – amended plan received 05.04.16
05-403 Rev P – amended plan received 05.04.16
05-404 Rev P – amended plan received 05.04.16
05-405 Rev P – amended plan received 05.04.16
LP/14SRWH/020 C

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