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| Committee date | Monday 16 December 2019 |
| Application reference Site address | 19/00496/FULM - 934-974 Marchwood House, St Albans Road, Watford, WD25 9NN |
| Proposal | Redevelopment of the site to provide 165 residential units in 2 buildings both part 4 / 5 storeys in height, with 150 car parking spaces, communal landscaped amenity areas, secure cycle parking and other associated development. |
| Applicant | Fairview New Homes (London) Limited |
| Agent | Fairview New Homes (London) Limited |
| Type of Application | Full Planning Permission |
| Reason for committee Item | Major Application |
| Target decision date | 17 December 2019 |
| Statutory publicity | Watford Observer, Neighbour Letters and Site Notice |
| Case officer | Andrew Clarke, andrew.clarke@watford.gov.uk |
| Ward | Meriden |

1. Recommendation

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

2. Site and surroundings

- 2.1 The site comprises an irregular shaped parcel of land with an area of 2.9 acres (1.19 hectares) comprising a former operational bus depot (Sui Generis Use). There is a two storey office at the front of the site which is a non-designated heritage asset (locally listed building). This building has several telecom masts on the roof. At the rear is a double height depot building. The remainder of the site comprises hard standing with two vehicular access points onto St. Albans Road, one at the northern end and another at the southern end. While the existing two-storey office building is locally listed the site is not in a Conservation Area.
- 2.2 There is a parade of local shops with flats above, located south of the site. To the rear of the shops is Garston Park Parade where there are two storey semi-detached dwellings and to the east of these dwellings fronting the Felden Close are more two storey semi-detached dwellings. Garston Park is to the north along with a three storey flatted building with a pitched roof. To the east adjoining the existing double height depot building are two storey dwellings fronting Codicote Drive. These dwellings are semi-detached and terraces with rear gardens adjoining the development site. To the west of the

site on the opposite side of St Albans Road is a funeral directors, three storey residential flatted buildings, a two storey dwelling and a TGI Friday, Premier Inn and McDonald's. Notwithstanding the above, the surrounding area is largely residential housing with a mix of two dwellings and three storey flatted buildings.

- 2.3 The site itself is 3 miles north of Watford Town Centre. Garston mainline station is 0.4 miles to the south east. Buses along St Albans Road run south towards Watford Town Centre, past The Dome roundabout services and facilities. To the north is the junction of St Albans Road and North Orbital Road.
- 2.4 The bus depot was used by Arriva buses until they moved their operation in mid-2018.

3. Summary of the proposal

3.1 Proposal

- 3.1.1 Redevelopment of the site to provide 165 residential units in 2 buildings both part 4 / 5 storeys in height, with 150 car parking spaces, communal landscaped amenity areas, secure cycle parking, a new connection to Garston Park and other associated development. The residential units comprise 1 x studio (0.6%), 58 x 1 beds (35.2%), 81 x 2 beds (49%) and 25 x 3 beds (15.2%). Whilst the application form does not specifically state that the proposal includes the demolition of the buildings on site, there is no prior approval for the demolition and therefore this application has included the demolition of the buildings.

3.2 Conclusion

- 3.2.1 The loss of the locally listed building to facilitate the residential redevelopment of the site is accepted in principle.
- 3.2.2 The scale and design of the proposal are considered suitable within the context of St Albans Road where flatted schemes are not uncommon. The height of the development is one or two storeys higher than the other flatted schemes, but due to the size of the site and the siting of the two buildings, the development successfully accommodates this additional height. The new buildings are also replacing generally large industrial-type buildings which did not complement the surrounding residential character.

- 3.2.3 Generally the proposed dwellings are of a suitable size and quality. The number of single aspect north-facing units has been kept to a minimum but couldn't be avoided. These units will have a reduced level of light. The development has been designed in two blocks to maximise light and space for the units. Most units have private balconies.
- 3.2.4 The proposal does provide some affordable housing which includes larger units but the quantity is not at 35% due to the viability assessment that was submitted with the application and the vacant building credit.
- 3.2.5 The proposal would cause no undue loss of daylight, outlook or privacy to any adjoining occupiers with respect to the residential design guidelines.
- 3.2.6 The car and cycle provision within the site are considered acceptable at this site in accordance with policy.

4. Relevant policies

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

5. Relevant site history/background information

- 5.1 18/00976/PREAPP - Pre application by Fairview New Homes - advice for proposed redevelopment of existing Arriva bus depot circa 172, 1, 2 and 3 bedroom apartments. The proposal developed throughout the pre application process to the current application.

6. Main considerations

- 6.1 The main issues to be considered in the determination of this application are:
- (a) Principle of the use
 - (b) Scale and design
 - (c) Loss of the locally listed building and employment
 - (d) Quality of residential accommodation
 - (e) Affordable housing provision
 - (f) Impact on amenity of adjoining residential properties
 - (g) Transport, parking and servicing
- 6.2 (a) Principle of the use

- 6.2.1 The site has no specific planning designations, except for the locally listed designation of the existing office block facing St Albans Road. The loss of the existing bus depot use is not contested.
- 6.2.2 Policy HS1 of the Core Strategy lists the criteria that will be taken into account in assessing the suitability of sites for residential use. In this case, the site is previously developed land, is not at risk of flooding, has no biodiversity or landscape value has good access to public transport and a wide range of services. The principle of a residential development would be in keeping with the residential nature of the area.
- 6.2.3 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. Of particular relevance is paragraph 11.
- 6.2.4 Currently Watford Borough Council cannot demonstrate a five year supply of deliverable housing sites. Therefore the local plan policies which are most important for determining the application for housing are considered out-of-date. Given this scenario, paragraph 11 states that 'Plan and decisions should apply a presumption in favour of sustainable development' by granting planning permission unless:
1. The application of policies in this Framework [the NPPF] that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 2. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 6.3 (b) Scale, design and layout
- 6.3.1 St Albans Road would be modified to facilitate this proposal. The existing northern entrance would be retained, albeit with some realignment including a new ghost island to the middle of the highway to allow northbound vehicles to turn into the site without blocking the northbound carriageway. The southern entrance would be closed to vehicular traffic with a pedestrian entrance retained to this side.
- 6.3.2 The proposed layout comprises two buildings containing five cores: A & B fronting St Albans Road and C, D & E to the rear of the site. A new tree lined avenue which would penetrate the site with parking areas to either side some of which would be covered by timber pergolas. Each of the buildings would

surround a green amenity area with a connection to Garston Park introduced to the northern boundary of the site. A substation is proposed in the north-eastern area of the site.

- 6.3.3 In massing terms the two buildings would be four to five storeys high with the uppermost floor set back on many of the elevations. The front building follows the street edge of St Albans Road and reinforces the streetscene of dwellings fronting the street, with 7 pathways to the dwellings. The building at the rear is made up of three wings/buildings and starts at the axis of the entrance road and fronts the new internal road around the site. The proposed buildings are considered to have a good setback which allows for the additional height on the site.
- 6.3.4 The primary material proposed throughout the development is two tones of red brick: light and medium to differentiate in a subtle way particular parts of the buildings. The entrances will be identified with a vertical band of windows grouped together with blue brick surrounded by a metal frame. Textured brick is proposed around the base of the entrances for easier wayfinding. The balconies will be part-recessed and part-projecting, allowing for good levels of privacy, whilst adding some depth to the elevations. All balconies are vertically stacked and grouped over the entire height of the building, providing a vertical rhythm to the otherwise predominantly horizontal frontage of the buildings. The rear elevations will host a cluster of projecting open balconies on posts to add more articulation to this quite simple side.
- 6.3.5 The blocks have been designed with elevations which are suitably distanced from those opposite. Each block will enclose and overlook a soft landscaped communal amenity area with trees placed either side of the avenue through the site.
- 6.3.6 The contemporary flatted design of the development will be in contrast to the semi-detached houses of Codicote Drive and Felden Close, however flatted developments do exist along St Albans Road, though these feature traditional features such as bay windows and pitched roofs. It should be noted that the existing office building fronting St Albans Road, contrasts with its surroundings and whilst the proposed building is different, it is considered to complement the residential character of the area with the amount of landscaping on site.
- 6.3.7 The height of the buildings, at five storeys is higher than those along this section of St Albans Road. The top floor of the building facing St Albans Road is set back from the front elevation, which reduces its visual dominance of the building from the street, as does the articulation of the elevations. The flatted developments opposite (Evolution) and adjacent (Park Lodge) are three

storeys with pitched roofs. The roofline of these adjacent developments would be consistent with the four storeys which would front St Albans Road. It is considered that the proposed building height would sit comfortably within the street scene not causing significant harm to demonstrably outweigh the benefits of the proposal taken as a whole.

- 6.3.8 The density of the development would be 139 dwellings per hectare. Such a density would be substantially higher than the prevailing surrounding densities which is comprised of semi-detached properties with large gardens. However it should be noted that this proposed density is not entirely out of character when considered against other flatted developments adjoining and nearby on St Albans Road. In addition, the development will significantly reduce the amount of hardstanding on the site that currently exists.
- 6.3.9 Evolution, the flatted residential development opposite is comprised of 22 flats at a density of 99 dwellings per hectare. Park Lodge, the flatted development adjacent is comprised of 22 flats at 117 dwellings per hectare. Park View, nearby at 865 St Albans Road is comprised of 9 flats at 139 dwellings per hectare which is identical to the proposed scheme. The difference with the subject development is that it is at a larger scale.
- 6.3.10 It is acknowledged that the proposed density would not conform to Policy HS2 of Watford's Core Strategy. This policy does seek low density family houses with gardens in more suburban areas. This policy would be considered out-of-date by paragraph 11 of the NPPF given the lack of a five year housing supply. Conversely the NPPF at paragraph 123 which seeks to optimise development and seek a significant uplift in the density of residential development.
- 6.3.11 Average densities are higher along St Albans Road, which is a key thoroughfare in Watford. Main roads such as this are less suited to family housing. During pre-application discussions planning officers did suggest lower density family housing with gardens to the rear of the site to transition better with the adjoining residential development, though this approach was not pursued by the applicant. Given this context and policy position the density of the proposed development is considered acceptable.
- 6.3.12 In order to ensure that the appearance of the building in the street scene is not diminished, a condition is proposed removing permitted development rights for communications equipment is proposed.
- 6.4 (c) Loss of the locally listed building and employment

- 6.4.1 The office block facing St Albans Road is locally listed. The block was the administrative building for the bus garage. It was constructed in the early 1950's by the chief architect to the London Transport Executive, Thomas Bilbow, who also designed the Grade II Listed bus garage at Stockwell in London. It is a tall two storey building finished in multi-coloured bricks with bay windows and clean lines. It is mid twentieth century modern in style. The architectural significance of the building has declined over the years with the replacement of the original windows, additional signage and much telecommunications equipment added to the flat roof.
- 6.4.2 The applicant has submitted a heritage report. This report is very dismissive of the importance of the building and its locally listed status. Saved policy U15 of Watford's District Plan does seek the reuse of locally listed buildings where possible. The significance of the locally listed building is considered low. The potential of reusing the building is limited given that it was not designed for residential use. Retaining the building would limit the wider development of the site.
- 6.4.3 It is accepted that the demolition of the locally listed building will cause some degree of harm, though it is considered that this can be appropriately mitigated by a condition requiring a historic building record be made prior to demolition requiring external and internal photographs.
- 6.4.4 The development site is not identified as an employment site or within an employment area in planning policy. The property was put on the market for sale approximately 18 months ago and any employment use had the opportunity of occupying the site. It is considered that due to the site constraints and the location adjacent to a park, the most appropriate use of the site is residential.
- 6.5 (d) Quality of residential accommodation.
- 6.5.1 The proposal will create 165 residential units. The building facing St Albans Road would contain two cores (A and B) both of which can be accessed from the front and rear sides of the building. This building would contain 74 dwellings (37 from each core). Four of the units in this building are duplexes, facing St Albans Road with their own entrances from St Albans Road as well as an internal entrance. Six further ground floor units have secondary external access.
- 6.5.2 The rear building would contain three cores. Core C accesses 35 dwellings, 10 of which have balconies which directly face Garston Park. Core D accesses 25 dwellings and Core E accesses 31. All cores have access to the front and rear

sides of the building. Core E has external communal terraces at each level used to access the flats. 19 units are accessed by these terraces.

6.5.3 The development would contain 165 dwellings. This is comprised of:

- 1 Studio Flat
- 58 one bedroom two person units
- 14 two bedroom three person units
- 67 two bedroom four person units
- 25 three bedroom five person units

6.5.4 Per unit this percentage is:

- 0.6% Studio Flats
- 35.2% one bedroom two person units
- 8.4% two bedroom three person units
- 40.6 two bedroom four person units
- 15.2% three bedroom five person units

6.5.5 In total the development would create 460 habitable rooms.

6.5.6 The council would have preferred a greater percentage of three bedroom units as per policy HS2 of Watford's Core Strategy. It is noted that all 25 of the three bed units are suitable for five person occupancy and none have been designed as three bedroom four person units, for which 12 fewer square meters are required. Additionally the proportion of two bed four person occupancy is significantly higher than two bed three person units. A two bedroom four person unit only requires four fewer square metres than a three bedroom four person unit.

6.5.7 The scheme would still provide a significant number of three bedroom units. All 25 three bedroom units have balconies / terraces, all have at least dual aspect with 14 being triple aspect and all have adequate light levels to their kitchen / living / dining rooms.

6.5.8 161 of the units have one single room for kitchen / dining and living. This is fairly typical of new homes. 4 units (numbers 137, 144, 151 and 158) have separate kitchens. The separate kitchens are not counted as 'habitable rooms' in this report.

6.5.9 14 units (numbers 118, 124, 130, 137, 140, 142, 144, 147, 149, 151, 154, 156, 158 and 162) have no private balconies or terraces. All of these units are two bedroom 4 persons units. This size unit requires a gross internal area of 70 square metres. Of these 14 units 4 are 70 square metres, 4 are 70.4 square meters, 3 are 72.6 square metres and 3 are 74.4 square meters.

- 6.5.10 26 units are single aspect. Of these 3 are north facing (numbers 45, 51 and 62), 11 are east facing (numbers 8, 15, 24, 51, 60, 69, 110, 113, 119, 125 and 131), 11 are south facing (numbers 14, 23, 32, 81, 88, 95, 102, 109, 140, 147 and 154) and one is west facing (number 103).
- 6.5.11 3 single aspect south facing units have no private amenity space (numbers 140, 147 and 154).
- 6.5.12 The applicant has submitted a daylight and sunlight assessment. The report uses the BRE standards which are accepted by the Watford's Residential Design Guide. This report only makes an assessment of the ground and first floor of the development. This report therefore only calculates daylight to 63 of the 165 dwellings. It is accepted that dwellings on the second to fourth floors are likely to have better light levels, though they may not all comply with the BRE guidance.
- 6.5.13 The report outlines minimum required light per room and the proposed light. Bedrooms require less light than the kitchen/ living / dining rooms. It is noted in the report that three of the living rooms have been measured against the light requirements of bedrooms. This error does slightly distort light making light levels appear better.
- 6.5.14 Of the 63 ground floor and first floor flats (and duplexes) assessed the report shows that 11 would receive insufficient daylight into their living / kitchen / dining rooms (numbers 1, 8, 9, 44, 45, 50, 51, 81, 88, 111 and 114). All of these flats face into the enclosed courtyards to the rear of the buildings. The bedrooms in all these units receive sufficient light. Unit number 81 has the lowest light levels of all the units with the living room achieving 53% of light required by BRE guidelines.
- 6.5.15 There is some concern with daylight levels within some of the dwellings. The vast majority would receive good light levels. Paragraph 123 of the NPPF states *"when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)."*
- 6.5.16 Taking this flexible approach encouraged by the NPPF the quality of accommodation is considered acceptable. In schemes of this density, it is not uncommon for some units to suffer from lower levels of light.
- 6.6 (e) Affordable housing provision

- 6.6.1 Policy HS3 of the Watford Local Plan Core Strategy requires 35% provision of affordable housing in schemes of 10 or more units with a tenure mix of 20% Social rent, 65% Affordable rent and 15% shared ownership. The application was submitted with a Viability Assessment in accordance with paragraph 57 of the NPPF.
- 6.6.2 The original offer made by Fairview New Homes was for 17 shared ownership units. This figure is 10.3% by unit and 13.5 % by habitable room. This figure would accord with policy 64 of the NPPF which expects “*at least 10% of the homes to be available for affordable home ownership.*” However this is not where affordable homes are needed in the borough.
- 6.6.3 Fairview New homes also sought to invoke policy 63 of the NPPF which relates to Vacant Building Credit. This credit states “*where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount*”. This would reduce the affordable housing contribution by 57%. The 35% requirement of policy HS3 would therefore be reduced to 15.35%. The application of Vacant Building Credit was accepted based on planning appeals identified by the applicant.
- 6.6.4 The viability assessment was reviewed by the independent viability consultants, BNP Paribas. Following meetings and discussions on details of viability BNP Paribas accepted the applicant’s viability assessment. A copy of the documents is available to view online.
- 6.6.5 Fairview New Homes acknowledged the concern about the lack of affordable housing and the mix proposed and made a new affordable housing offer which was greater than that originally proposed and included social rented and affordable rented housing.
- 6.6.6 The case officer then proposed an alternative affordable housing offer which provided a greater number of three bedroom social rented units – the type of accommodation most needed. This request was accepted by Fairview New Homes.
- 6.6.7 The affordable housing contribution proposed is:
- 4 x three bedroom five person social rented units
 - 3 x three bedroom five person affordable rented units
 - 5 x two bedroom four person affordable rented units.
- 6.6.8 These figures equate to 7.3% by unit and 9.3% by habitable room. Although lower in percentage terms the type of affordable housing is preferred to

increasing the percentage with smaller shared ownership units, which do not meet the housing need.

6.6.9 The affordable units would be unit numbers 135 to 146, comprising all of the units at ground floor level and first floor level accessed off core E. Providing the accommodation in one block simplifies their management. Most of the affordable housing units are dual aspect.

6.7 (f) Impact on amenity of adjoining residential properties

6.7.1 The applicant has submitted a Daylight and Sunlight report which assesses light levels to all adjoining properties in accordance with the Building Research Establishment's publication "Site Layout Planning for Daylight and Sunlight. A Guide to Good Practice." (2011).

6.7.2 The assessment has been undertaken using measurable factors of the Vertical Sky Component (VSC), No-Sky Line Contour (NSC), Average Daylight Factor (ADF) and Annual Probable Sunlight Hours (APSH) tests set out within the aforementioned guidance.

6.7.3 The properties considered by the assessment are:

- 1 to 22 Evolution, 839 to 847 St. Albans Road
- 849 St. Albans Road
- 1-20 Park Lodge, St. Albans Road
- 831 St. Albans Road
- 833 St. Albans Road
- 835 St. Albans Road
- 837 St. Albans Road
- 25, 27, 29, 32 and 34 Felden Close
- 59 to 83 Codicote Drive

6.7.4 Park Lodge adjoins the northern boundary of the site. Park Lodge contains 20 flats with communal gardens to the rear. The southern flank wall of this development is approximately 0.5 metres distant from the northern boundary of the site. The two side facing windows at the ground floor are the only neighbouring windows which would not achieve the recommended VCS, though it is considered they would not meet this as existing, due to the proximity of the boundary wall. The flank wall of this building, at the closet point would be 19 metres from Block A.

- 6.7.5 The eastern side of the northern boundary adjoins Garston Park, for which a new pathway will be introduced. The new access to the park would benefit both residents and the wider public.
- 6.7.6 Numbers 63 to 83 (odds) Codicote Drive adjoin the eastern boundary of the site. These properties have gardens which extend approximately 20 metres beyond the original rear wall of the dwellings. The existing bus garage shed structure to the rear of the site is approximately 2.5 metres from the boundary of the site. This shed structure is tall, capable of storing double deck buses. The proposed development at the closest point (Block E) would be 20 metres from the boundary with the properties on Codicote Drive. The proposed development would be 40 metres distant from the original rear walls of the properties on Codicote Drive. It is accepted that many properties on Codicote Drive have extensions which would reduce this 40 metre figure by a few metres. This separation distance is considered acceptable and exceeds the provisions of Watford's Residential Design Guide which seek a separation on 27.5 metres. It is recognised that the residents of Codicote Drive are likely to feel overlooked due to the height of the proposed building and the change of use to residential. However, there would be benefits such as the demolition of the existing shed structure allowing more light into these gardens, particularly in the afternoon given the orientation. The layout of the car park and internal access road is considered likely to create additional noise on site that the adjoining residents would not be used to and the demolition of the existing structure may allow vehicular noise from St Albans Road to reach these dwellings. However, these impacts are not considered significant to outweigh the benefits of this housing scheme.
- 6.7.7 Similarly numbers 25 to 29 (odds) and 32 to 34 (evens) Felden Close have rear boundaries which adjoin the southern boundary of the site. Numbers 29 and 34 are the only ones which have rear elevations which do not face the development at an obtuse angle. These two properties have gardens which are 16.5 metres in depth, and the new development would be 36.5 metres distant from the closest point of the development (Block E).
- 6.7.8 To the western side of the southern boundary are the properties which form part of Garston Park Parade. These properties are orientated perpendicular to the boundary. The main terrace has no side facing windows. Therefore the proposed development is likely to have a minimal impact on these properties.
- 6.7.9 Number 19 Garston Park Parade sits behind the parade adjacent to the boundary with the bus garage. This property is comprised of small flats at ground floor (granted lawfulness by 16/01198/LDC) with office use at first floor level. The ground floor residential windows look onto the fence and the

upper windows overlook the site. The proposed positioning of the buildings means that the upper floor office windows would overlook the landscaped area. This building would suffer no loss of amenity. The former use of the site is considered to have a greater impact on this property than the proposed residential use as there will no longer be any buses on the site.

6.7.10 The buildings on the opposite (west) side of St Albans Road would not suffer any loss of amenity given their separation across St Albans Road.

6.7.11 Except for the two ground floor side facing windows in Park Lodge on the northern boundary, the proposal would comply with BRE guidelines and Watford's Residential Design Guide which outlines suitable privacy distances.

6.8 (g) Transport, parking and servicing

6.8.1 The existing site has two vehicular access points, both onto St Albans Road along the western boundary of the site. Hertfordshire County Council Highways have agreed to the realignment of St Albans Road, subject to a 184 / 278 Highways Act agreement. The northern vehicular entrance would be retained, albeit with some realignment. This would be the only vehicular entrance /exit. The southern access would be closed with only pedestrian access retained. The closing of the southern entrance is the logical solution as this has a higher potential for conflict given the proximity of other junctions. A new ghost box would be created to the middle of the roadway, which ensures northbound vehicles entering the site do not block the traffic flow.

6.8.2 The realigned highway would create three recessed parking bays in front of the site on St Albans Road. Subject to a Traffic Regulation Order from Hertfordshire County Council, two of these bays would share one electric charging point with one of these bays allocated to a car club with a second space for general electric vehicle charging. This forms part of the section 106 agreement. If, for any reason Hertfordshire County Council do not allow a Traffic Regulation Order, a fall-back position is to provide one electric car club space within the site.

6.8.3 The applicant has prepared a transport assessment. Hertfordshire County Council have assessed the proposal and have concluded that the impact on the junctions at St Albans Road / Garston Lane and St Albans Road / Horseshoe Lane / A405 is negligible. The site is not within an Air Quality Management Area and the negligible increase in traffic resulting from this development is not considered to cause any significant detriment to air quality.

- 6.8.4 150 car parking spaces are proposed to serve the new homes, at a ratio of 0.91 spaces per dwelling. The proposed level of car parking has been supported by analysis of on street parking survey data and local car ownership data. Data from the office of national statistics indicates that car ownership is 1.2 cars per household. For flatted developments car ownership per household is 0.79 cars per household.
- 6.8.5 The parking standards of the Watford District Plan 2000 set maximum parking requirements for new developments. For the residential development proposed in allocated zone 4, the maximum car parking provision would be 177.5 spaces. The provision of 150 spaces is below that maximum and is compliant with policy.
- 6.8.6 Conditions proposed covers alterations to the highway, the layout of parking areas and a car parking management plan outlining car parking allocations. These would be required to be completed prior to the occupation of the dwellings.
- 6.8.7 The site is not within a controlled parking zone. The transport assessment includes surveys of parking pressure within the vicinity of the site. These surveys were conducted on weekdays between the hours of 00:30 and 5:30 when parking levels would be highest. It concludes that there is additional parking capacity is available within the surrounding roads, though it is considered that parking provision within the site is sufficient. It should be considered that the former bus garage use would have generated parking pressure on surrounding residential streets, which no longer exists.
- 6.8.8 The site is served by frequent buses along St Albans Road, which connect the site to Watford Town Centre which is three miles to the south. Garston Railway station is 0.4 miles from the site. This station is served by a train every 45 minutes to Watford Junction and a train every 45 minutes to St Albans. The frequency of this service is reduced to hourly late evenings and a weekends.
- 6.8.9 The proposal includes 165 cycle parking spaces within designed cycle stores which are located at ground floor level near the entrances to the flats.
- 6.8.10 Watford's Waste and Recycling consultee is satisfied with the proposed refuse collection arrangements.

7 Consultation responses received

7.1 Statutory consultees and other organisations

| Name of Statutory Consultee / Other Organisation | Comment |
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| Hertfordshire County Council (Highways Authority) | Do not wish to raise an objection, subject to: <ul style="list-style-type: none"> - A Section 106 Agreement will be required for obtaining a £6000 fee toward the monitoring and evaluation of the Travel Plan - A Section 278, or Section 184 Highways Act 1980, Agreement (whichever is most appropriate) to agree the detailed design of any changes to the highway, - Condition 1: Demolition and Construction - Condition 2: Traffic Management Plan Provision of Parking and Servicing Areas - Condition 3: Car Parking Management Plan - Condition 4: Servicing and Delivery Plan - Condition 5: Travel Plan - Informative 1: Storage of materials - Informative 2: Obstruction of the highway - Informative 3: Mud on highway - Informative 4: General works within the highway |
| Hertfordshire County Council Growth & Infrastructure | No objection. |
| Hertfordshire County Council Fire and Rescue Service | Seeks the provision of fire hydrants via Section 106 Agreement. |
| Hertfordshire County Council Minerals and Waste | No objection. |
| Hertfordshire County Council Ecology | No objection subject to: <ul style="list-style-type: none"> - A condition for a Biodiversity and Landscape Plan - An informative for any protected species if found on site. |
| Hertfordshire County Council (Lead Local Flood Authority) | No objection subject to: <ul style="list-style-type: none"> - Condition 1 Development is carried out in accordance with Flood Risk |

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| | <p>Assessment and Surface Water Strategy.</p> <ul style="list-style-type: none"> - Condition 2: Submission of Surface Water Drainage Scheme |
| Hertfordshire Constabulary Crime Prevention Design Service | Requested measures to ensure that the development is built to Secured by Design standards. |
| Thames Water | No objection. |

7.2 Internal Consultees

| Name of Internal Consultee | Comment |
|----------------------------|--|
| Environmental Health | <p>Recommended conditions for:</p> <ul style="list-style-type: none"> - Condition 1: Remediation Scheme - Condition 2: Verification Report - Condition 3: Unexpected Contamination |
| Planning Policy | <p>Not supportive of the proposal. Concerns with:</p> <ul style="list-style-type: none"> - Density - Housing Mix - Design of Buildings - Landscaping <p>Proposed a historic building record to be made of the office building prior to demolition.</p> |
| Housing | <p>Welcomes the provision of 3 bed Social Rented Housing, though would have preferred more Affordable Housing overall, but not the affordable housing provision is subject to Viability Assessment.</p> |
| Waste and Recycling | Satisfied with the proposals. |
| Arboricultural Officer | No objections to the proposals providing all recommendations made within the AIA and TPP are followed and implemented. |

7.3 Interested Parties

Letters were sent to 206 properties in the surrounding area. 41 responses were received. 40 objected to the proposal. 1 response was neutral. Of these objections, 5 are from addresses which responded more than once. The objections are from a wide area, with many coming from beyond the 206 consulted by letter. The main comments are summarised below, the full

letters are available to view online:

| Comments | Officer response |
|--|---|
| Insufficient Parking | The parking provision is considered acceptable as explained in section (g) above. |
| Public Transport is not adequate | The site is well served by buses and Garston Railway Station is nearby. As noted in section (g) public transport is considered sufficient. |
| Additional congestion and pollution on St Albans Road. | As noted in (g) above Hertfordshire County Council Highways considered the additional trip generation negligible. The site is not within an Air Quality Management area. |
| Overdevelopment | The density of the development is considered acceptable in this context as outlined in section (b) above. |
| Design of the buildings | The proposed buildings are considered to be of a high quality design which would enhance the street scene. See section (b) above. |
| Insufficient infrastructure (schools / healthcare etc.) to support this development. | WBC is not responsible for the provision of schools or healthcare which are Herts CC and NHS matters. Through the planning process, contributions towards infrastructure are collected from developers under the Community Infrastructure Levy. |
| Loss of Outlook / Privacy | The buildings are suitably distanced from those which surround the site in accordance with the separation distances specified by Watford's Residential Design Guide. See section (f) above. |
| Noise and Disturbance from site | The construction works are subject to a Construction Management plan, which seeks to reduce disturbance. The resultant residential use, in residential surroundings would not generate any undue noise or disturbance. |
| Anti-Social Behaviour | The development is designed to be Secured by Design Standards, as requested by the Hertfordshire Constabulary. These standards reduce potential for anti-social behaviour. The number of flats on site |

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| | would make for good surveillance over the communal areas. |
| Telecommunication Equipment on roof of new buildings | The permitted development rights for such equipment is removed by condition. |
| Watford's Planning Policy | The housing target of 260 homes per year in Watford's Core Strategy no longer applies. The government has increased this to 798. The draft local plan has not yet been adopted. Its policies do not apply. See section (a) above. |
| Resident's objections are being ignored. | All representations have been considered carefully by planning officers and members of the Development Management Committee will scrutinise this report. It is however neither possible or appropriate to reject development which contributes positively to the needs of the borough and is compliant with local and national policies. |

8 Recommendation

Section 106 Heads of Terms

- i) To secure all 12 residential units as Affordable Social Rented accommodation comprising 4 no. Social Rented Housing Units (4 x 3B5P) and 8 no. Affordable Rented Housing Units (3 x 3B5P and 5 x 2B4P);
- ii) To secure a review mechanism of the viability of the development to be undertaken towards the end of the project when actual build costs and sales values of the flats are known. This shall allow financial payment to be made towards affordable housing provision where the viability of the development can be shown to have improved to provide a financial surplus;
- iii) To secure the provision of fire hydrants as required by the County Council to serve the development;
- iv) To secure the provision of Electric Vehicle Charging Points;
- v) To secure Car Club Provision;

- vi) To secure Car Club Membership for residents;
- vii) To secure a financial payment to Hertfordshire County Council of £6,000 for the long term monitoring of the proposed Travel Plan for the site
- viii) To secure a financial payment to Watford Borough Council of £10,966.55 for the Garston Park Connection.

Conditions

1. Three Years

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

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

2. Approved Plans

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

6697_D1000
6697_D3100
6697_D3000
6697_D3001
6697_D3002
6697_D3003
6697_D3004
6697_D3005
C0089 L100
6697_D3200-AB
6697_D3201-AB
6697_D3202-AB
6697_D3203-AB
6697_D3204-AB
6697_D3205-AB
6697_D3200-CD
6697_D3201-CD
6697_D3202-CD

6697_D3203-CD
6697_D3204-CD
6697_D3205-CD
6697_D3200-E
6697_D3201-E
6697_D3202-E
6697_D3203-E
6697_D3204-E
6697_D3205-E
6697_D3700-AB
6697_D3701-AB
6697_D3702-AB
6697_D3700-CDE
6697_D3701-CDE
6697_D3702-CDE
6697_D3703-CDE
6697_D3600
6697_D3400
6697_D3401
6697_D1200
6697_D1201
6697_D1500
6697_D1501
6697_D1502
6697_D1503

Planning Statement (prepared by FNH);
Design and Access Statement (prepared by Formation);
Affordable Housing Statement (prepared by FNH);
Landscape Strategy (prepared by Cameo & Partners);
Daylight / Sunlight Statement (prepared by CHP);
Statement of Community Involvement (prepared by Curtain & Co);
Noise Assessment (prepared by Syntegra Consultancy);
Remediation Method Statement (Hydrock)
Transport Assessment (prepared by Mott McDonald);
Travel Plan (prepared by Mott McDonald Transport Planning);
Flood Risk Assessment (prepared by RSK);
Air Quality (prepared by Syntegra Consultancy);
Energy Statement (prepared by Low Energy Consultancy Ltd);
Sustainability Strategy (prepared by Fairview New Homes Ltd);
Archaeology Assessment (prepared by CGMS);
Demolition and Construction Management Plan (prepared by FNH);
Ecology Report (prepared by RPS).
Heritage Statement (prepared by Montagu Evans)

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

3. Materials

No external facing materials shall be installed on any building of the development until full details and samples of all the materials to be used for the external surfaces of the buildings have been submitted to and approved in writing by the Local Planning Authority.

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

4. Hard Landscaping

No part of the development shall be occupied until a detailed hard landscaping scheme for the site, including site boundary treatments and external lighting has been submitted to and approved in writing by the Local Planning Authority, and the works have been carried out in accordance with the approved details. The detailed scheme shall be based upon the Illustrative Landscape Masterplan (drawing reference: C0089 L100).

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

5. Soft Landscaping

No part of the development shall be occupied until a detailed soft landscaping scheme for the site and a landscape management and maintenance plan, has been submitted to and approved in writing by the Local Planning Authority. The detailed scheme shall be based upon the Illustrative Landscape Masterplan (drawing reference: C0089 L100). The approved soft landscaping scheme shall be carried out not later than the first available planting and seeding season after completion of development. Any trees or plants whether new or existing which within a period of five years die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, or in accordance with details approved by the Local Planning Authority.

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

6. Highway Works

No part of the development shall be occupied until the modified access and egress arrangements from St Albans Road, as shown in principle on the approved drawings has been completed in full.

Reason: In the interests of the safe operation of the site and the surrounding highway, in accordance with saved Policies T21 and SE7 of the Watford District Plan 2000.

7. Bins and Bikes

No dwelling within each block of the development shall be occupied until the bin and bicycle storage of that block has been provided for the use of residents, in accordance with the approved drawings. These facilities shall be retained at all times for the use of the residential occupiers of the dwellings.

Reason: To ensure that adequate facilities exist for the future occupiers of the dwellings, in accordance with saved Policies T10 and SE7 of the Watford District Plan 2000, Policy UD1 of the Watford Local Plan Core Strategy 2006-31 and the Residential Design Guide 2016.

8. Internal Noise Levels

All residential units shall achieve the recommended maximum internal noise levels under BS 8233.2014 through the following provisions in accordance with section 7.2 of the Noise Impact Assessment dated April 2019 Ref 18-4646 Rev C.

Reason: To ensure residential occupiers do not experience undue noise and disturbance.

9. Aerials and Satellite Dishes

No dwelling shall be occupied until details of a communal terrestrial television aerial(s) and satellite dish(es) have been submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of the character and appearance of the building, in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

10. Communications Equipment

For the avoidance of doubt, no communications development permitted by Classes A, B or C of Part 16 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) shall be undertaken on any of the buildings hereby approved.

Reason: In the interests of the character and appearance of the buildings, in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

11. Flat Roof not a Terrace or Balcony

No parts of the flat roof of the development, with the exception of those areas marked as terraces on the drawings hereby permitted shall be used as a terrace, balcony or other open amenity space.

Reason: To prevent overlooking and consequent loss of privacy to neighbouring premises pursuant to Policy UD1 of the Watford Local Plan Core Strategy 2006-31 and the Residential Design Guide 2016.

12. Demolition and Construction Traffic Management Plan

Demolition of the existing buildings and the construction of the development hereby approved shall not commence until a Demolition and Construction Traffic Management Plan has been submitted to and approved in writing by the Local Planning Authority in consultation with Hertfordshire County Council. Thereafter, the demolition of the existing development and construction of the approved development shall only be carried out in accordance with the approved plan. The Demolition and Construction Traffic Management Plan shall include details of:

- a. Demolition and construction vehicle numbers, type, routing;
- b. Traffic management requirements;
- c. Construction and storage compounds (including areas designated for car parking);

- d. Siting and details of wheel washing facilities;
- e. Cleaning of site entrances, site tracks and the adjacent public highway;
- f. Provision of sufficient on-site parking prior to commencement of demolition and construction activities;
- g. Post construction restoration/reinstatement of the working areas and temporary access to the public highway.

Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way.

13. Provision of Parking and Servicing Areas

Prior to the first occupation of the development hereby permitted, the proposed access /on-site car parking 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.

14. Car Parking Management Plan

Prior to first occupation of the development, a Car Parking Management Plan shall be submitted to and approved in writing by the LPA. It shall include the following:

- Details of car parking allocation and distribution;
- Details of the car club regarding the operation, management, and implementation scheme;
- Methods to minimise on-street car parking;
- A scheme for the provision and parking of cycles; and,
- Monitoring required of the Car Parking Management Plan to be submitted to and approved in writing in accordance with a timeframe to be agreed by the LPA.

The Car Parking Management Plan shall be fully implemented before the development is first occupied or brought into use, in accordance with a timeframe agreed by the LPA, and thereafter retained for this purpose.

Reason: In the interests of highway safety and to ensure sufficient available on-site car parking and the provision of adequate cycle parking that meets the needs of occupiers of the proposed development and in the interests of encouraging the use of sustainable modes of transport.

15. Servicing and Delivery Plan

Prior to first occupation of the development, a Servicing and Delivery Plan shall be submitted to and approved in writing by the LPA. The Servicing and Delivery Plan shall contain the delivery and servicing requirements (including refuse collection) for the proposed uses, a scheme for coordinating deliveries and servicing for the proposed development, areas within the development site that would be used for loading and manoeuvring of delivery and servicing vehicles, and access to / from the site for delivery and servicing vehicles. The development shall be carried out in accordance with the details approved.

Reason: In the interests of maintaining highway efficiency and safety.

16. Travel Plan

At least 3 months prior to the first occupation of the approved development a detailed revised Travel Plan for the site, based upon the Hertfordshire Council document 'Hertfordshire's Travel Plan Guidance', shall be submitted to and approved in writing by the Local Planning Authority in consultation with Hertfordshire County Council. The approved revised Travel Plan shall be agreed prior to first occupation and shall be implemented at all times.

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

17. Remediation Scheme

Following demolition and prior to the commencement of construction of the development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

i) A supplementary investigation shall be undertaken in the areas that were previously inaccessible, based on the Phase I Desk Study Review and Phase II Ground Investigation (Document ref. ABD-HYD-XX-XX-RP-GE-0001) and the Remediation Method Statement (Document ref. ABD-HYD-XX-XX-RP-GE-3000) prepared by Hydrock Consultants Limited, to provide information for a detailed assessment of the risk to all receptors that may

be affected, including those off site. This should include an assessment of the potential risks to: human health, property (existing or proposed) including buildings, crops, pests, woodland and service lines and pipes, adjoining land, ground waters and surface waters, ecological systems, archaeological sites and ancient monuments.

ii) The results of the supplementary investigation and the detailed risk assessment (i) shall be used to revise the Remediation Method Statement (Document ref. ABD-HYD-XX-XX-RP-GE-3000) where necessary, to give full details of the remediation measures required and how they are to be undertaken.

iii) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (ii) are complete and identifying any requirements for longer term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

18. Verification Report

Following completion of measures identified in the approved remediation scheme and prior to the first occupation of the development, a verification report that demonstrates the effectiveness of the remediation carried out must be produced together with any necessary monitoring and maintenance programme and copies of any waste transfer notes relating to exported and imported soils shall be submitted to the Local Planning Authority for approval. The approved monitoring and maintenance programme shall be implemented.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

The above must be undertaken in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

19. Unexpected Contamination

Reporting of Unexpected Contamination: In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition 1, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 1, which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with condition 1.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

20. Historic Building Record

The existing office block fronting St Albans Road shall not be demolished until an historic building record has been made and submitted to and agreed in writing by the Local Planning Authority. The document shall include a written and photographic record of the building internally and externally.

Reason: To ensure a record is made of this building of local interest, in accordance with policy UD2 of the Watford Local Plan Core Strategy 2006-2031.

21. Accordance with Mitigation Measures

The development permitted by this planning permission shall be carried out in accordance with the Flood Risk Assessment carried out by RSK reference 133511-R1(2)-FRA dated April 2019 and Surface Water Strategy carried out by ID Ltd reference IDL/941/DS/01-Issue 1 dated April 2019 and the following mitigation measures;

1. Limiting the surface water run-off rates to greenfield run-off rates for all rainfall events up to and including the 1 in 100 year + climate change event with discharge into the surface water sewer utilising a complex control.
2. Provide 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. Implement drainage strategy as indicated on the proposed drainage strategy drawing utilising lined permeable paving and an attenuation tank as indicated in the Drainage Strategy drawing FNH434/13.3/100.

Reason: To reduce the risk of flooding to the proposed development and future occupants.

22. Surface Water Drainage Scheme

No development shall take place until the final design of the drainage scheme is completed and sent to the LPA for approval. The surface water drainage system will be based on the submitted the Drainage Statement carried out by Simpson Consulting Engineers reference 14661 dated 16 February 2018. The scheme shall also include;

1. Detailed engineered drawings of the proposed SuDS features including their, location, size, volume, depth and any inlet and outlet features including any connecting pipe runs and all corresponding calculations/modelling to ensure the scheme caters for all rainfall events up to and including the 1 in 100 year + 40% allowance climate change event.
2. Demonstrate an appropriate SuDS management and treatment train and inclusion of above ground features such as permeable paving, swales etc. for the access road and reducing the requirement for any underground storage.
3. Silt traps for protection for any residual tanked elements.
4. Final detailed management plan to include arrangements for adoption and any other arrangements to secure the operation of the scheme throughout its lifetime.

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

Informatives

1. Positive and proactive statement
2. Street naming and numbering

3. Building Regulations
4. Party Wall Act
5. Hours of Construction
6. Community Infrastructure Levy Liability
7. Section 106 Agreement/Undertaking
8. Highway Works – HCC agreement required
9. Storage of materials
10. Obstruction of the highway
11. Road Deposits
12. Environmental Health
13. Ecology