

<b>Committee date</b>	Tuesday 26 July 2022
<b>Application reference</b> <b>Site address</b>	22/00506/FULM - 125-133 The Parade, High Street, Watford, WD17 1NA
<b>Proposal</b>	Proposed redevelopment of the site to provide 147 residential dwellings (Class C3) and retail/commercial use (Class E) with associated car parking, cycle parking, and landscaping.
<b>Applicant</b>	Watford Parade (Gibraltar) Ltd
<b>Agent</b>	Sphere25
<b>Type of Application</b>	Full Planning Permission
<b>Reason for committee Item</b>	Major Application
<b>Target decision date</b>	Wednesday 27 July 2022
<b>Statutory publicity</b>	Watford Observer, Neighbour Letters and Site Notice
<b>Case officer</b>	Andrew Clarke, andrew.clarke@watford.gov.uk
<b>Ward</b>	Central

## 1. Recommendation

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

## 2. Site and surroundings

- 2.1 The subject site is approximately half a hectare and occupies a prominent position within Watford town centre. The site has an irregular shape fronting The Parade, Albert Road South and Beechen Grove. The site contains a three storey building which dates from 1964. The building is currently occupied by commercial and leisure uses including an Iceland supermarket, a bar, laser planet, a nightclub, two estate agents and a beauty salon. To the rear is a large carpark used in association with the supermarket. The site is partially within the Civic Core Conservation area and the surroundings are historic containing many heritage assets.

## 3. Summary of the proposal

### 3.1 Proposal

Proposed redevelopment of the site to provide 147 residential dwellings (Class C3) and retail/commercial use (Class E) with associated car parking, cycle parking, and landscaping.

### 3.2 Conclusions

In terms of benefits the proposal would deliver 147 new residential units on a site which is allocated for mixed use development by the draft Local Plan. The need to boost the supply of housing within the borough is important and would be attributed significant weight in the planning balance although the lack of affordable housing provision would be a limiting factor against this benefit. The external appearance of the main building would be another benefit, improving the appearance of this site from The Parade and Albert Road South.

- 3.3 In terms of adverse impacts, the National Planning Policy Framework (NPPF) is clear that permission should be refused for development of poor design which fails to take the opportunities available to improve the character and quality of an area and the way it functions. The external appearance of the smaller building facing Beechen Gove would appear awkward and bulky between two non-designated heritage assets, and the loss of trees required to facilitate this building is also considered very poor. Creating high quality buildings and places is fundamental to what the planning and development process should achieve but the overall quality of the residential units is very poor due to the heavily used nature of the cores, the very poor external amenity provision, poor outlook from many of the units and the daylight / sunlight levels which have not been measured for units which are likely to suffer most from limited levels of both.
- 3.4 Although there are considerations that weigh in favour of this proposal, officers are of the opinion that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole. The proposal would not therefore be the sustainable development for which Paragraph 11 of the Framework indicates a presumption in favour.
- 3.5 Notwithstanding the above, Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 3.6 Watford Borough Council has published its Final Draft Local Plan 2018 to 2036 for Formal Consultation (under Regulation 19) of the Town and Country (Local Development) (England) Regulations 2012. The formal publication ran for a period of 6 weeks between 18 January and 18 March 2021. Following a review of the comments received, submission of the plan was made in August 2021 with examination in January 2022 and anticipated adoption in autumn 2022. The Final Draft Local Plan is therefore a material planning consideration.

3.7 This proposed development is considered to fail to accord with the Development Plan and the Final Draft Local Plan 2018 to 2036.

#### **4. Relevant policies**

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

4.2 Paragraph 11 d) of the National Planning Policy Framework 2021 (NPPF) establishes the 'presumption in favour of sustainable development' and the principles of the 'tilted balance' that apply where a local planning authority cannot demonstrate a 5 year housing supply or have failed to deliver at least 75% of their housing requirement as part of the Housing Delivery Test. Where the tilted balance applies, decision makers should grant permission unless NPPF policies on protected areas or assets of particular importance provide a clear reason for refusing development or, any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, assessed against NPPF policies taken as a whole. The tilted balance has the effect of shifting the weight in the planning balance away from local policies and towards the NPPF.

4.3 The Council scored below 75% in the most recent Housing Delivery Test results for 2021 and therefore the 'tilted balance' applies to the determination of this planning application.

#### **5. Relevant site history/background information**

5.1 A pre-application request (ref: 21/00865/PREAP6) was received on 9<sup>th</sup> June 2021, a meeting was held on 8<sup>th</sup> July and a written response was issued on 16<sup>th</sup> July 2021. The redevelopment of the site for mixed-use development was supported in principle, however, the scheme proposed was not supported in respect of its scale and height which failed to make a positive contribution to the wider historic context.

5.2 Following the first pre-application, the applicant entered into a Planning Performance Agreement (PPA) linked to a second pre-application request (ref: 21/01537/PREAP6) which was received on 2<sup>nd</sup> December 2021. New architects were appointed to take a fresh look at the potential for redevelopment of the site. Under the PPA a series of pre-application meetings to discuss new proposals was agreed. Meetings were held on 6<sup>th</sup> January, 10<sup>th</sup> February and 24<sup>th</sup> February 2022. The proposal was reviewed by the Watford Place Shaping

Panel on 8<sup>th</sup> March 2022. Written feedback from the Panel was provided on 21<sup>st</sup> March 2022. A written response from the Council was issued on 1<sup>st</sup> April 2022.

- 5.3 The written feedback from the Panel and the Council supported the revised scale and height of the main building, but not the smaller building. Significant concerns were raised regarding the quality of accommodation, the impacts to neighbouring amenity, the lack of suitable cycle facilities and the harm to trees and biodiversity. The Watford Place Shaping Panel written feedback is appended to this report at appendix 2 and is a material planning consideration.
- 5.4 Minor amendments were made to the proposal and this application was received on 8<sup>th</sup> April 2022.

## **6. Main considerations**

- 6.1 The main issues to be considered in the determination of this application are:
- (a) Principle of a mixed-use residential development
  - (b) Layout, scale and design
  - (c) Commercial Floorspace
  - (d) Quality of Residential Accommodation
  - (e) Affordable housing provision
  - (f) Impact on amenity of adjoining residential properties
  - (g) Transport, parking and servicing
  - (h) Trees and biodiversity
- 6.2 (a) Principle of a residential development  
The Watford Local Plan Core Strategy designates this site as being within Special Policy Area 1. This policy area incorporates the town centre as a whole and seeks to strengthen and consolidate Watford's position as a regional centre with a more balanced provision of town centre facilities and infrastructure, including retail, leisure, entertainment and other town centre uses and access improvements.
- 6.3 The site is within the Secondary Retail Frontage where the Council will seek to retain the general retail character of the frontage while permitting an adequate number of non-retail units.
- 6.4 The front part of the site is within the Civic Core Conservation Area which contains a large number on both nationally and locally listed buildings. In this area the buildings have a strong relationship across the pedestrianised street

and the pond. While there is variation in building height, there is a consistency in the materials and rhythm of the buildings which creates a coherence to the streetscape.

- 6.5 The Final Draft Watford Local Plan designates this site as being within the Town Centre Core Strategic Development Area. Proposals in this area will be supported where good design contributes positively towards creating a vibrant town centre, focused on people, healthy lifestyles and quality of life. Final Draft Local Plan site allocation MU10 considers this site to be suitable for mixed use development, including residential and commercial uses.
- 6.6 A night club has operated at this site since the current building was completed, occupying the upper floors. Adopted and draft policy seeks to create a vibrant town centre though there is no specific national or local planning policy which protects the existing nightclub use.
- 6.7 The existing 1960's building on site is of limited architectural merit. Its demolition to allow for the comprehensive redevelopment to create a mixed use scheme is acceptable in principle, subject to the normal considerations set out in planning policy.
- 6.8 (b) Layout, scale and design  
Core Strategy Policy UD1 and Draft Local Plan Policy QD6.2 set out key design principles which should be considered when designing a proposal. Development should create high quality new places which respect and enhance the character of its area. Chapter 12 of the NPPF sets out national policy for achieving well-design places and key design qualities are set out in paragraph 130.
- 6.9 The application site occupies a prominent position within the town centre at the corner of The Parade and Albert Road South. To the rear the site also has prominence from Beechen Grove, though the rear is currently undeveloped and lined by tall mature trees.
- 6.10 This proposal seeks to construct two buildings comprised of one larger mixed use building which would occupy the footprint of the existing building and a second smaller residential building which would face Beechen Grove positioned between St Albans House to the north and Elm Court to the south. The land between the two buildings would be used as a car park in connection with the commercial use.
- 6.11 The proposed scale and massing of the main, larger building with a height of five storeys fronting The Parade with eight storeys to the rear is considered

appropriate in accordance with Final Draft Local Plan Policy QD6.5 which addresses building height within the Town Centre Core Strategic Development Area. This building height reflects the balance between existing character, constraints and opportunities within the town centre and is appropriate for this site. The massing is not considered to cause any significant harm to the historic setting. The curved corner which wraps around The Parade is a positive architectural feature and the overall elevational treatment, subject to appropriate design details and materials is supported.

6.12 The smaller five storey residential building, which sits to the rear of the site would be of a contemporary form and style, however, its external elevations appear uninspiring and bland. The recessed balconies add little to the perception of depth and the elevations lack architectural articulation or interest. This building would be prominent in the townscape as it would be bulkier and higher than its surroundings. Its prominence from Beechen Grove would be heightened by the removal of the line of mature trees. Overall, its bland design and bulky proportions relative to the neighbouring non-designated heritage assets fails to visually engage with its setting. Final Draft Local Plan Policies QD6.1 and QD6.2 requires major development in the core development area to be high quality and make a positive contribution to place making. This building fails on both counts.

6.13 (c) Commercial Floorspace

The proposed development would create 2,153 square metres of retail floor space at ground floor and basement level. This would be comprised of two units, one larger fronting Albert Road and one smaller facing towards High Street and the pond. The retail provision represents a floor space increase on the existing retail provision in accordance with town centre policy.

6.14 (d) Quality of Residential Accommodation

The development would provide the following mix of accommodation:

- 80 x 1 bedroom units (54.5%)
- 58 x 2 bedroom units (39.5%)
- 9 x 3 bedroom units (6%)

6.15 The proposed mix is considered to accord with Core Strategy Policy HS2 of the Local Plan Core Strategy which seeks a variety of housing typologies. Draft Local Plan Policy HO3.2 more specifically requires at least 20% of new homes as family sized (3+bed).

6.16 The main block has two residential entrances accessing two cores, one of which serves 78 residential units with the other core serving the remaining 53.

At five levels one of the cores would serve 12 units. This number of units per core and floor is considered excessive failing to demonstrate that they would create safe, healthy and attractive internal spaces. Final Draft Local Plan Policy QD6.4 requires internal cores to serve no more than 8 units per floor.

- 6.17 Section 7.3.6 of the Residential Design Guide (RDG) sets out the minimum Gross Internal Areas for new dwellings in accordance with the Nationally Described Space Standards (NDSS). All of the proposed units would meet the minimum floorspace standard for the dwelling type proposed and are compliant with the NDSS.
- 6.18 Within the main block only 41 units (31%) have private amenity space. The lack of private amenity space for 90 units (69%) of accommodation is considered unacceptable. Final Draft Local Plan Policy HO3.11 states that a minimum of 5 square metres of private outdoor space should be provided for 1-2 person dwellings and at least one additional square metre should be provided for each additional occupant.
- 6.19 Three communal amenity areas for residents are provided at first, fifth and sixth floor levels in the main block. One of the cores would have access to all three areas with the other core only having direct access to the first floor communal amenity. Watford's RDG at section 7.3.23 expects all new flatted residential developments to provide communal outdoor amenity space. A 131 unit building would require 1985 square metres using the RDG guidance. It is accepted that this may be difficult to achieve in a town centre location, though the proposed 894 square meters, in the absence of private amenity space to 69% of units, is not considered acceptable. This communal amenity provision would be particularly poor for residents of the 53 unit core who would only have direct access to 359 square meters of the communal amenity space at first floor level which is shared with the 78 units accessed via the other core. The daylight sunlight report depicts significant overshadowing and explains that only 40% of this first floor amenity area would only receive at least 2 hours of sun on 21st March which fails to meet the BRE guidance of 50%.
- 6.20 The daylight sunlight assessment only makes an assessment of a small number of the residential units within the scheme. This sample selection taken is not considered to be representative of the scheme as a whole. The units which are likely to receive the least daylight and sunlight due to their orientation have not been assessed. In addition to this the assessment is missing two floorplans which would enable identification of the windows which have been assessed. In the absence of a full assessment, acceptable levels of daylight and sunlight to all units have not been demonstrated.

- 6.21 Of the 131 units in the main building 98 (75%) would be single aspect and nine units would only have one opening (either window or door). Eight of these nine units open onto the corner of the rear courtyard, which would severely constrain their outlook. These units have not had their daylight sunlight levels assessed. Whilst single aspect units should be avoided wherever possible, it is accepted that on high density proposals that it may be difficult to avoid single aspect units altogether. However, where single aspect units are proposed it is important to robustly scrutinise the quality of the accommodation proposed as single aspect units often suffer from issues of poor daylighting, overheating, noise disturbance or limited outlook. The application fails to provide sufficient justification to demonstrate that the single aspect units in the scheme would provide an overall high quality of accommodation when also taking account of the heavily used nature of the cores and the very poor external amenity provision.
- 6.22 The units which do benefit from private amenity space are largely those which have projecting balconies with views across the 12 metre rear courtyard which is enclosed by the flank wall of neighbouring number 135 The Parade. This 12 metre separation distance would give a poor outlook with an overbearing sense of enclosure for the single aspect north-west facing units. In addition to this the projecting nature of the balconies allows views into neighbouring units, particularly across the internal corners of the courtyard. Such a proximity would result in limited privacy for occupants.
- 6.23 All 16 residential units within the smaller residential building would have terraces or balconies, though there would be no communal amenity space. The lack of any significant communal amenity space for a block which contains all of the three bedroom units which would suit occupation by families is considered poor. Communal amenity space is a requirement of the RDG (as noted above). Many of the balconies and windows in this building overlook the proposed the car park which is likely to be used late into the evening with more movements than that associated with residential use. This would make for poor amenity in terms of outlook and noise. The ground floor units in this building have windows which are 1.7 to 5.4 meters from the high boundary fence. This lack of separation would give the ground floor units little outlook all round making them feel enclosed.
- 6.24 The Watford Place Shaping Panel were also concerned that there were too many residential units per core and questioned the significant proportion of single aspect units and the lack of private and communal amenity space. Their comments can be viewed in full in the written feedback which is appended to this report.



- 6.25 (e) Affordable housing provision  
Policy HS3 of the Core Strategy requires a 35% provision of affordable housing. This provision should have a tenure mix of 65% affordable rent, 20% social rent and 15% intermediate tenures. Draft local plan policy HO3.3 also requires 35% provision, with a tenure mix which includes 60% social rent.
- 6.26 The applicant proposes no affordable housing. This has been explained through the submission of a detailed viability appraisal which shows the development to be unviable. Why the applicant would build the scheme at this level of deficit identified within the submitted appraisal is not explained.
- 6.27 The viability appraisal has been subject to a detailed and robust viability review by Aspinall Verdi (AV), acting on behalf of the Council. AV tested a policy-compliant scenario to determine whether the scheme could support the contribution sought by Policy HS3. The outcome of this policy complaint scenario concluded that the development to still be unviable generating a deficit of £15.3 million. AV also tested an entirely private scenario to determine whether the scheme would be financially viable. This concluded a deficit of £7.5 million.
- 6.28 Over time values fluctuate. AV have shown that if sales values increase and construction costs decrease, a policy compliant scheme begins to become viable. AV have strongly recommended that a viability review mechanism is included within any Section 106 agreement.
- 6.29 (f) Impact on amenity of adjoining residential properties  
The north wall main building would be positioned 13.5 metres from the curtilage of the site with Elm Court and 20 metres from the building itself at the closest point. Elm Court is comprised of 12 residential units, all of which are dual aspect facing north and south. The distance between habitable room windows would vary between 20 and 27 metres. This separation represents an increase of 3 meters relative to the existing situation. Unlike the existing building, the proposed building does contain habitable room windows and Juliet balconies. This separation in this urban context is considered acceptable.
- 6.30 The main building would cause no significant loss of amenity to any nearby residential unit within Elm Court, on Albert Road South or along The Parade. This has been demonstrated by the daylight sunlight assessment.
- 6.31 The smaller building would be positioned approximately 10 metres from St Albans House (181 The Parade) at the closest point. The daylight sunlight assessment does make an assessment of daylight and sunlight impacts to this

neighbouring building, though the number of residential units within the building, internal layouts and room uses are not shown, having not been researched. It notes that two rooms within this St Albans House would have their Vertical Sky Component figures fall by 30% and 40%, though it is unaware that these two windows are the only habitable room windows within flat number 1 within St Albans House. It should also be noted that BRE guidelines state that a 20% reduction is the threshold for a noticeable change.

- 6.32 The building has habitable room windows and balconies facing St Albans House across a private service road. The separation at the closest point between habitable room windows within the development and existing flat numbers 1, 9 and 17 within St Albans House would be 11 metres. Watford's RDG at section 7.3.16 addresses privacy and outlines separation distances. Between front elevations separation distances would be determined by the street layout. Typical separation distances across roads, including service roads would typically be around 14 to 16 metres. The separation distance of 10 metres between the buildings and 11 metres between the habitable room windows would result in significant loss of privacy and outlook to existing residential units in this context. It is noted that two sycamore trees adjacent to the north western boundary are proposed for retention. Retaining these trees would further reduce daylight to the proposed residential units, particularly during the summer months when they are in full leaf.
- 6.33 (g) Transport, parking and servicing  
Policy ST11.5 of the Draft local plan, which is reflective of up to date transportation requirements suggests that retail development within the core development area should be car free and that residential units provide a maximum of 0.3 spaces per unit. The existing site provides 75 parking spaces used in connection with the Iceland supermarket. Overall the provision of 57 spaces represent a reduction in car parking at the site which is supported. Although a greater reduction in the quantity of parking would be preferred, the proposed number of parking spaces, which is a 24% reduction of existing levels is accepted. The residential parking provision is in accordance with draft policy. Any increase in vehicle trips would be negligible.
- 6.34 The proposal depicts a sufficient quantity of residential cycle storage within each building to comply with Final Draft Local Plan Policy ST11.5. In the main building the cycle store would be located in the basement accessed by the lifts in both cores. Having the residential cycle parking in the basement is inconvenient and compounds concerns regarding the overall quality of the accommodation to be provided. The same policy would require 107 spaces to serve the retail uses. The plans depict 7 spaces in 4 locations around the car park for the retail use. The position of cycle parking in the basement and low

provision of cycle spaces to serve the retail uses does not encourage sustainable modes of transport. Without an easily accessible and secure place for people to store their cycle, both at home and at their destination, they are unlikely to choose to cycle their journey.

6.35 (h) Trees and biodiversity

The Arboricultural Implications Report explains that nine trees along the boundary with Beechen Grove would need to be felled to allow for the construction of the smaller building. These nine trees are comprised of two ash, four cypress, one lime and two oak trees. The trees are all semi mature or mature and stated to be between 7 and 17 metres in height. Six trees are within the site and three outside the site. These trees provide a significant green buffer to the site along Beechen Grove their loss would result in a substantial loss of visual amenity.

6.36 Adjacent to the north western boundary of the site within the conservation area are two sycamore trees (T18 and T19). The trunks of these trees are 0.9 metres and 1.8 metres from the proposed flank wall of the smaller building with the closer tree positioned in front of the communal refuse store door restricting access to it. The report explains that the extent of pruning to these trees is beyond the relevant British Standard recommendations, though it still proposes their pruning. Even if the roots were protected by pile and beam foundations, the loss of approximately half of the crown would severely prejudice the health of these trees, which would be protected by their location within a conservation area and result in them having to be felled. The suggestion that these trees can be retained is impractical. If they were retained, they would substantially reduce light and outlook to the proposed flats, a matter which is not considered in the daylight and sunlight assessment.

6.37 The applicant suggests that the substantial loss of trees would be compensated through planting and has shown a line of six trees within the proposed car park and four trees outside the site on the embankment of the pedestrian underpass. It is not clear how the four trees outside the site would be secured and whether their position is suitable. The six trees within the proposed car park sit at the junction of four parking spaces and would therefore be contained by virtue of their position. This proposed planting would not compensate for the loss of 9 or 11 much larger, mature trees which have significant amenity value and life expectancy. Draft Local Plan Policy NE9.1 seeks to conserve and enhance the natural environment and requires development proposals should follow the 'mitigation hierarchy' of avoidance, mitigation or compensation. The retention and conservation of the trees does not appear to have been considered. The Arboricultural report suggests that

the trees were not a consideration in the site layout and the tree constraints plan referred to has not been provided. Any potential uplift in the number of residential units on this site alone does not justify such a substantial loss of trees proposed by this application.

## 7 Consultation responses received

### 7.1 Statutory consultees and other organisations

<b>Name of Statutory Consultee / Other Organisation</b>	<b>Comment</b>	<b>Response</b>
Hertfordshire Constabulary Crime Prevention Design Service	No response received.	None.
Hertfordshire County Council Flood Authority	No response received.	Pre commencement conditions could be used.
Hertfordshire County Council Growth and Infrastructure	Community Infrastructure Levy applicable.	Noted
Hertfordshire County Council Highways	Objects to the car focused nature of the proposal and seeks various clarifications in relation to servicing and access. Should the application be granted conditions requiring a construction management plans and a travel plan are recommended.	Noted
Thames Water	No objection.	Noted.

### 7.2 Internal Consultees

<b>Name of Statutory Consultee / Other Organisation</b>	<b>Comment</b>	<b>Response</b>
Watford Borough Council Arboricultural Officer	Objected due to loss of soft landscaping and suggested the severe pruning of some	Noted.

	retained trees would severely prejudice their health.	
Watford Borough Council Environmental Health	Requested further acoustic information, though did not object in principle.	Noted.
Watford Borough Council Housing Service	Did not support scheme because it proposed no affordable housing.	Noted.
Watford Borough Council Waste and Recycling	Stated refuse requirements and noted that dropped kerbs would be required to facilitate collection.	Noted.

### 7.3 Interested Parties

Letters were sent to 129 properties in the surrounding area, a site notice was erected and the proposal was advertised in the Watford Observer. 534 responses were received. 401 were in objection, 91 in support and 42 were neutral.

The vast majority of the responses were received late on Friday and Saturday evenings. Many of the responses provided no written comments, and those which did were brief and often irrelevant, though the overriding concern raised was clearly with the loss of the existing nightclub. It is noted that many respondents who had chosen the support option, wrote comments in objection. No response in support provided clear written reasoning for their support. Many of names and addresses provided appear fictional. A few comments were offensive and were not published on the Council's public access website.

The main comments are summarised below, the full letters are available to view online:

The proposed development would create 2,153 square metres of retail floor space at ground floor and basement level. This would be comprised of two units, one larger fronting Albert Road and one smaller facing towards High Street and the pond. The retail provision represents a floor space increase on the existing retail provision in accordance with town centre policy.

<b>Comments</b>	<b>Officer response</b>
Loss of the nightclub	Watford Borough Council cannot mandate that the nightclub, a private business remains open. See

	paragraph 6.6 of the report which relate addresses the principle of the development.
Loss of jobs	The proposed development would increase the retail provision which would provide jobs. See paragraph 6.13 of the report which relate addresses the commercial floorspace.
Insufficient parking / increase in traffic	Parking provision is considered acceptable and the impact on the highway network is considered negligible. See paragraph 6.32 of the report which relate addresses parking provision and highway impacts.
Overdevelopment of area	The development makes effective use of an allocated site brownfield site and contributes to addressing housing need in Watford. See section paragraph 6.5 which relates to the principal of a residential development.
Lack of open space for residential units.	The lack of open space for the residential units is poor. See paragraphs 6.18, 6.19 and 6.23 of the report which relate addresses the quality of residential accommodation.
Pressure on local services	The development is CIL (Community Infrastructure Levy) liable. This levy is used to help the local authority to deliver the infrastructure needed to support development in the area.
Lack of affordable housing	The lack of any affordable housing is disappointing, though this has been subject to an independent viability review, and if permission were to be approved we would recommend a late stage review. See paragraphs 6.24 to 6.27 of the report which relates to accommodation and affordable housing.
Anti-Social Behaviour	The proposal is not considered to give rise to anti-social behaviour.
Disruption from construction	A construction management plan would be required were this application to be viewed favourably. This would mitigate disruption from the construction works. The Environmental Protection Act, the Control of Pollution Act and the Highway Act also control the matters of disruption raised.

## 8 Recommendation

**That planning permission be refused for the following reasons:**

## Reasons:

1. The building facing Beechen Grove, by virtue of its bland design and bulky proportions relative to the neighbouring non-designated heritage assets fails to respect the character and appearance of the surrounding area and would be an overbearing addition to the streetscene. The loss of mature, healthy trees to facilitate this building is also significant. As such the development would be contrary to paragraph 127, of the National Planning Policy Framework 2021, Policies SS1, UD1 and UD2 of the Watford Local Plan Core Strategy 2006-31, saved policies SE36, SE39 and U15 of the Watford District Plan 2000, Policies QD6.1, QD6.2, QD6.4, HE7.3, NE9.1 and NE9.8 of the Final Draft Local Plan 2018-2036 and sections 7.1, 7.2 and 7.3 of Watford's Residential Design Guide 2016.
2. The residential units, by virtue of the heavily used nature of the cores, the very poor external amenity provision, the compromised outlook, their lack of privacy across the first floor courtyard and the lack of justification as to adequate daylight, sunlight and overheating fail to provide a high quality of accommodation. As such the development would be contrary to paragraph 130 of the National Planning Policy Framework 2021, Policies SS1 and UD1 of the Watford Local Plan Core Strategy 2006-31, Policies HO3.11 and QD6.4 of the Final Draft Local Plan 2018-2036 and section 7.3 of Watford's Residential Design Guide 2016.
3. The design of the proposal, by virtue of its proportions and fenestrations of the building facing Beechen Grove, would cause significant loss of light, sense of enclosure and loss of privacy to neighbouring residential dwellings within St Albans House. Such a loss of neighbouring amenity is contrary to paragraphs 130 of the National Planning Policy Framework 2021, Policies SS1 and UD1 of the Watford Local Plan Core Strategy 2006-31, Policy VT5.2 of the Final Draft Local Plan 2018-2036 and section 7.3 of Watford's Residential Design Guide 2016.