

| | |
|---|--|
| Committee date | Tuesday 6 September 2022 |
| Application reference Site address | 22/00442/FUL – 18 Garston Drive Watford WD25 9LB |
| Proposal | Erection of 6 terraced, 4-bedrooms energy-efficient dwellings with associated gardens and parking spaces in what is currently the rear garden of 18, 18B, 20 and 22 Garston Drive. |
| Applicant | Living Space Homes |
| Agent | Zed-Power |
| Type of application | Full planning application |
| Reason for committee item | 5 or more objections submitted |
| Target decision date | 7 September 2022 |
| Statutory publicity | Neighbouring properties consulted 5 th April 2022 |
| Case officer | Chris Osgathorp chris.osgathorp@watford.gov.uk |
| Ward | Stanborough |

1. Recommendation

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

2. Site and surroundings

- 2.1 The application site is located to the rear of Nos. 18 to 22 Garston Drive and was historically part of the gardens associated with the properties on Garston Drive. To the east the site adjoins No. 5 Wheatley Drive, which forms part of an infill development of dwellings to the rear of Nos. 10 to 14 Garston Drive that was granted planning permission in 2001. To the rear (north) is a public footpath, and the rear gardens of properties in Crown Rise are further beyond.
- 2.2 The surroundings are residential, predominantly characterised by mid twentieth century semi-detached and detached dwellings with generous gardens. Infill development has occurred in the area with new cul-de-sacs to both sides of Garston Drive. The spacing of the houses and the soft landscaping that is visible in the street scene provides a suburban feel to the area.
- 2.3 Garston Park shopping parade is approximately 400 metres to the east on St Albans Road, which provides local shops and services. There are also nearby bus stops on St Albans Road.
- 2.4 The site is not located in a designated conservation area or other Article 2(3) land. The site contains no protected trees and parking is not subject to controls.

3. Summary of the proposal

3.1 Proposal

3.2 Erection of 6 terraced, 4-bedroom energy-efficient dwellings with associated gardens and parking spaces.

3.3 Conclusion

3.4 The proposal follows previous planning permissions at the site for residential development and is acceptable in principle. Whilst the properties in the vicinity are generally semi-detached or detached, the proposed terrace would be commensurate with the general height and scale of buildings in the area. Furthermore, the terraced built form would make efficient use of the land, which is supported by local and national planning policy, and provides energy efficiency benefits due to fewer external walls.

3.5 The building would sit comfortably on the site and would maintain adequate spacing to the site boundaries. The outdoor space provides opportunities for appropriate planting and ecological enhancements and would therefore be sympathetic to the local environment. On-site parking spaces would be at a discreet level to ensure that it would not dominate the public realm and would meet the Council's objectives to encourage the use of sustainable modes of transport.

3.6 The architectural style of development in the area is varied and it is considered that the contemporary design and materials of the proposal would provide an acceptable appearance. Due regard should be given to national planning policy which is clear that planning decisions should not prevent or discourage appropriate innovation or change. It is also noted that the scheme would not appear prominent in the street scene due to its back land location set to the rear of properties in Garston Drive and Crown Rise.

3.7 The proposed dwelling would provide a high standard of amenity for future occupiers – meeting internal room size standards and providing good levels of light and outlook to habitable rooms – and would not cause significant harm to the living conditions of the occupiers of neighbouring properties.

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

4. Relevant policies

4.1 Members should refer to the background papers attached to the agenda. These highlight the policy framework under which this application is

determined. Specific policy considerations with regard to this particular application are detailed in section 6 below.

- 4.2 Paragraph 11 d) of the National Planning Policy Framework (the Framework) 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 years 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 Framework policies on protected areas or assets of particular importance provide a clear reason for refusing development or, and adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, assessed against the Framework 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 Framework.
- 4.3 The Council scored 48% in the most recent Housing Delivery Test results and therefore the ‘tilted balance’ applies to the determination of this planning application.

5. Relevant site history/background information

- 5.1 17/01709/FUL – Development of site to provide 4 no 3 bedroom dwelling houses. Conditional planning permission. February 2018.
- 5.2 20/01453/FUL – Development to the rear of 18-22 Garston Drive to provide 5 no. 4 bed houses. Conditional planning permission. February 2021.

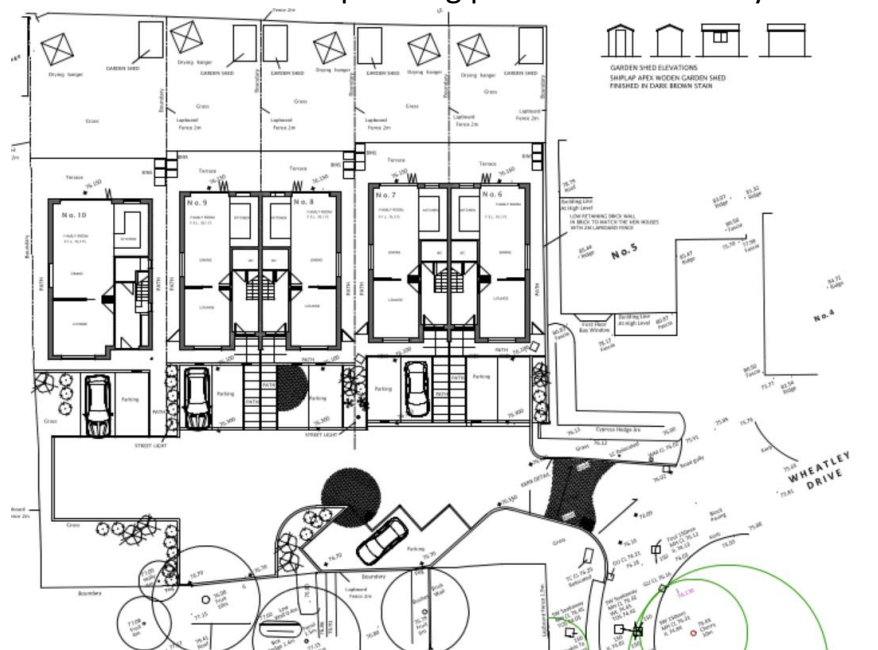


Figure 1. Approved site plan Ref. 20/01453/FUL.

5.3 21/01872/FUL – Erection of a terrace of 6 4-bedrooms, energy-efficient dwellings with associated gardens and parking spaces on site to rear of 18, 18B, 20 and 22 Garston Drive. Withdrawn.

6. Main considerations

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

(a) Principle of residential development

(b) The effect of the proposal on the character and appearance of the area

(c) The effect on the living conditions of neighbouring properties

(d) Whether an acceptable standard of amenity for future occupiers would be provided

(e) Access, parking and highway matters

(f) Bin storage

(g) Biodiversity

6.2 (a) Principle of residential development

The Core Strategy and Framework support the sustainable development of new homes in principle. Although the Final Draft Watford Local Plan does not yet have the full weight of adopted policy, it is noted that this also seeks more efficient use of land for new homes. The proposed development of new dwellings in a residential area therefore accords with the principles of local and national policy for new homes. It is also noted that there are previous planning permissions for residential development at the site.

6.3 ‘Saved’ Policy H9 of the District Plan states that back garden development will only be granted where there is a proper and safe means of access and the development is appropriate in design and quality. Paragraph 5.31 of the supporting text states that ‘In assessing such proposals particular regard will be given to means of access, design and layout, development density, integration with the character of the local area, security, traffic generation and general effects on nearby residential amenities’. As discussed in the relevant sections of the report, the proposed development is considered to accord with the policy objectives for back land development and so is considered to be acceptable in principle.

6.4 (b) Character and appearance

The proposed terrace would follow the general building line set by neighbouring properties in Wheatley Drive and therefore would sit

comfortably with the pattern of development in the area. The terrace would maintain adequate gaps to the site boundaries, and there would be a large space to the front, which would provide parking spaces and areas of soft landscaping, including new tree planting. The applicant submitted a revised landscape strategy to respond to comments from the Arboricultural Officer, and it is considered that the layout and landscaping provision would respect the suburban character of the area. A planning condition could be imposed to require the submission of a detailed landscaping scheme, including tree planting, for approval.

- 6.5 Whilst the properties in the vicinity of the site are generally semi-detached or detached, the proposed terrace would be commensurate with the height and scale of properties in the area. Furthermore, the terraced form would make efficient use of the land, which is supported by Strategic Policy SS1.1 of the Final Draft Watford Local Plan and paragraph 124 of the Framework. Moreover, paragraph 130 of the Framework states that planning decisions should not prevent appropriate change (such as increased densities). The terraced form also provides benefits in terms of providing greater thermal efficiency for the houses due to fewer external walls.
- 6.6 Regarding the architectural approach, the design and materials of the proposed terrace would provide a contemporary appearance. Officers sought the use of brick on the external elevations rather than render because it was felt that this would provide a higher quality appearance. Nevertheless, the applicant has explained in the Design & Access Statement that a rendered finish is required to reduce the embodied carbon emissions of the proposed development – a brick wall would require an additional foundation and therefore increase embodied carbon of the development. It is also noted that a large proportion of properties in the vicinity are finished in render or part render. Furthermore, it is acknowledged that render would be more easily maintained on individual dwellings than larger flatted development and so it would be more appropriate in this case.
- 6.7 Whilst the roof form and use of zinc cladding would diverge from the neighbouring roofs, paragraph 130 of the Framework highlights that planning decisions should not prevent or discourage appropriate innovation or change. The proposal would not appear prominent in the street scene due to its back land location set to the rear of properties in Garston Drive and Crown Rise. Furthermore, the architectural design of development in the area is varied and it is considered that the contemporary approach would provide an acceptable appearance. The proposed solar panels would be on the front elevation as this provides the required south-facing orientation. The solar

panels would be integrated, i.e. they would be embedded into a section of roof without tiles, which ensures that they would appear discreet.

6.8 Having regard to the above factors, it is considered that the proposal would maintain the character and appearance of the surrounding area.

6.9 (c) Living conditions of neighbouring properties

The proposed development would not cause a significant loss of daylight, sunlight or outlook to neighbouring properties due to the sizeable distances that would be maintained to the existing habitable windows and main outdoor amenity areas.

6.10 The nearest upper floor front window of the westernmost proposed dwelling would be around 24 metres from the rear elevation of No. 75 Garston Crescent. Whilst this would be slightly less than the 27.5 metres privacy arc referred to paragraph 7.3.16 (b) of the Watford Residential Design Guide (the RDG), the oblique position of the proposed front window in relation to the rear elevation of No. 75 would ensure that it would not cause a significant level of overlooking. This relationship is similar to that which was found to be acceptable under planning permission Ref. 20/01453/FUL.

6.11 Furthermore, it should be noted that the 27.5 metre privacy arc guidance relates to the distance between the rear elevation of a proposed development and neighbouring properties, rather than the front elevation. Paragraph 7.3.16(a) of the RDG states that the separation distance between front elevations will be determined by the street layout and the size of front gardens. In this case, it is considered that the windows in the front elevation of the terrace would be of a distance and position that would not cause significant overlooking into neighbouring windows and main outdoor amenity areas, and would therefore protect the privacy of the occupiers of neighbouring properties.

6.12 The 11 metre boundary guide set out in paragraph 7.3.16(b) of the RDG recommends that a minimum distance of 11 metres should be provided between rear habitable windows and property boundaries in order to minimise overlooking of private gardens. Whilst the rear habitable windows of the proposed terrace would be within 11 metres of the rear boundary, there is a public footpath which separates the site from the gardens in Crown Rise. The rear windows would be at least 11 metres from the rear boundaries of properties in Crown Rise and so the proposal would not cause an unacceptable level of overlooking into the neighbouring gardens.

- 6.13 The rear habitable windows would maintain distances of at least 27.5 metres from the properties in Crown Rise and therefore the proposal would not cause a significant loss of privacy to the neighbouring occupiers.
- 6.14 The original drawings showed the provision of first floor side-facing bedroom windows for the end-of-terrace dwellings. Due to concerns about overlooking of neighbouring gardens, the internal layout has been re-configured to ensure that the upper floor side windows would only serve non-habitable rooms. In order to protect the privacy of neighbouring occupiers, a planning condition should be imposed to require the windows to be obscurely glazed and non-openable below 1.7m.
- 6.15 For the above reasons, the proposed development would have no adverse effect on the living conditions of the occupiers of neighbouring properties.

6.16 (d) Standard of amenity for future occupiers

Each of the proposed dwellings would exceed the minimum gross internal floor area of 103sqm for 4-bed (5-person) 3 storey dwellings, as set out in the Technical Housing Standards – Nationally Described Space Standard.

Furthermore, the single and double bedrooms would meet the respective minimum sizes of 7.5sqm and 11.5sqm, and the storage provision would exceed the minimum requirement of 3sqm. The habitable rooms would benefit from good levels of natural lighting and outlook.

- 6.17 The proposed private gardens would range in size between 52 to 58sqm, which would be below the guidance minimum garden area of 80sqm outlined in paragraph 7.3.22 of the RDG. Nevertheless, the gardens would exceed with the garden provision of 25-40sqm set out in the Final Draft Watford Local Plan and so it is considered that they would provide a functional and useable outdoor space for future occupiers.

- 6.18 The proposal would therefore provide acceptable living conditions for future occupiers.

6.19 (e) Access, parking and highway matters

The Highway Authority has raised no objection to the proposal on highway safety grounds. It is noted that the proposed access is not materially different to that which was approved as part of planning permission Ref. 20/01453/FUL and is therefore considered to be acceptable. The Highway Authority also states that there would be sufficient accessibility for emergency vehicles. There would not be a significant impact on the local highway network given the modest amount of development.

- 6.20 The proposed parking provision consists of 1 space per dwelling (6 spaces) plus 3 visitor spaces, which accords with the Maximum Parking Standard of 3 spaces per dwelling in Appendix 2 of the Watford District Plan 2000. Weight is also given to the parking standards in Appendix E of the Final Draft Watford Local Plan, which sets out a maximum parking standard of 1 space per dwelling. This is more restrictive than the standards in the WDP2000 as supporting paragraph 11.40 highlights that controlling car parking and providing alternatives to personal vehicle ownership have been found to be some of the most effective methods for managing demand and thus addressing issues such as the perception of a car-dominated environment, congestion, unreliable journey times, diminished air quality and higher carbon emissions amongst others.
- 6.21 Most properties in the vicinity of the application site have on-site parking and it is not considered that the proposal would lead to significant overspill parking in surroundings roads that would result in significant harm to highway safety.
- 6.22 The Highway Authority comment that there is not a gap of 6 metres behind some of the parking spaces to allow for easy manoeuvring. It is noted that the corners of the 3no. visitor spaces are within 6 metres of the 3no. easternmost spaces to the front of the terrace. Nevertheless, because the visitor spaces are angled it is considered that all of the spaces would be accessible.
- 6.23 The 6no. parking spaces to the front of the terrace would be served by electric vehicle charging points, in accordance with emerging Policy ST11.5 of the Final Draft Watford Local Plan.
- 6.24 Storage provision of 3 cycles for each dwelling would be provided in the rear gardens, which would be accessed from the public footpath than runs to the rear of the site.
- 6.25 (f) Bin storage
- The proposed bin storage provision would be provided to the proposed dwellings on an individual basis rather than communal. The Waste & Recycling team has confirmed that this arrangement is acceptable. The bins would be easily accessible and appropriately located. Details of the design of the bin storage facilities could be secured through a planning condition.
- 6.26 (g) Biodiversity
- The application site is currently of little ecological value because the trees and vegetation that previously existed have been cleared. None of the trees were protected by a tree preservation order and the removal of all the trees was

agreed as part of the previous planning permissions at the site (landscaping conditions were imposed). There is no evidence of any protected or priority species at the site.

- 6.27 The application includes areas of soft landscaping and new tree planting around the site boundaries and within the site. The soft landscaping provision was supplemented following comments from the Arboricultural Officer. A planning condition should be imposed to require the submission of a detailed landscaping scheme, which shall include a scheme of ecological enhancements.

7. Consultation responses received

7.1 Internal Consultees

| Consultee | Comment Summary | Officer response |
|------------------------|--|------------------|
| Highway Authority | No objection | Noted. |
| Arboricultural Officer | <p>Initial response: <i>“The landscape scheme does not include sufficient compensation for the trees that have been removed to facilitate the development.</i></p> <p><i>A revised landscape plan is requested to include new tree planting along the south boundary and include alternative tree planting in the rear gardens to afford the site with future amenity value”.</i></p> <p>Following the submission of a revised plan to supplement the planting provision, the Arboricultural Officer confirmed that this is acceptable.</p> | Noted. |
| Waste & Recycling | The properties could have single bins per household or communal bins. | Noted. |

7.2 Interested parties

Letters were sent to 20 properties in the surrounding area and 7 letters of objection have been received. The main comments are summarised below, the full letters are available to view online:

| Objection comment | Officer comments |
|---|--|
| <p>The proposal takes no reference to the surrounding area in design, style or materials.</p> <p>There are no terraced homes in the area, only well-spaced large semi-detached and detached properties.</p> <p>Overdevelopment and cramped – out of keeping with the spacious character of the area.</p> <p>The design of the proposed properties will create an eye sore from all directions. Concerns about roof form, zinc cladding and alignment of windows. Modern design not in keeping with traditional style of properties in the area.</p> | <p>This is considered in paragraphs 6.4 – 6.8 of the report.</p> |
| <p>The side bedroom windows to the end terraces are too close to the existing property boundaries (within 11m) and will look directly into existing gardens/homes ensuring loss of privacy in contravention of Section 7.3.16b of the RDG.</p> <p>Other windows include bathrooms/en-suites and would not meet the 2m guidance referenced in 7.3.16 c of the RDG.</p> | <p>This is considered in paragraph 6.14 of the report.</p> |
| <p>The upstairs windows of house 6 (and possibly house 5) will provide a view into the rear garden, upstairs windows and downstairs windows of No. 75 Garston Crescent. It represents a</p> | <p>This is considered in paragraphs 6.10 – 6.11 of the report.</p> |

| | |
|--|---|
| <p>significant loss of privacy to the house and rear garden.</p> <p>It appears that the front upstairs windows of house 6 is less than 25 metres from the left hand rear upstairs window of No. 75. The same windows of house 6 appear to be within an arc of 45 degrees from the window which is within the planning privacy arc.</p> <p>It is understood that the criteria applies to rear of houses and direct neighbours. Such a restricted approach to this criteria appears to be illogical and irrational. The impact on privacy from the front of house 6 upon the rear of No. 75 and garden is the same as it would be if it was the rear of house 6.</p> | |
| <p>Loss of privacy to properties in Crown Rise.</p> | <p>This is considered in paragraphs 6.12 – 6.13 of the report.</p> |
| <p>Loss of light and overshadowing. Loss of outlook.</p> | <p>This is considered in paragraph 6.9 of the report.</p> |
| <p>Bedrooms 2 on the end terraces are small with a floor area of 7.3m² which does not meet the RDG's minimum floor area for a single bedroom of 7.5m².</p> | <p>The internal layout has been re-configured to ensure that the bedroom sizes meet the Technical Housing Standards – Nationally Described Space Standard.</p> |
| <p>There is an un-insulated area to 2nd floor office/storage area of the end terraces which will make the room cold and contribute loss of heat.</p> | <p>This is a matter for Building Regulations.</p> |
| <p>Servicing of the gardens via the Public Right of Way will cause obstruction to the Public Right of Way and potentially cause health & safety issues.</p> | <p>The rear access is likely to be used infrequently and it is not considered that the proposal would cause obstruction.</p> |
| <p>Although some biodiversity has now been included, this is unrealistic as homeowners are unlikely to retain the trees making the scheme again lacking in biodiversity.</p> | <p>The amount of space for soft landscaping is considered to be acceptable. Furthermore, the proposed parking provision accords with the Council's parking standards.</p> |

| | |
|---|---|
| <p>The fact that to include the biodiversity you need to reduce the parking spaces and vice versa demonstrates too many homes are being built on this plot and one shouldn't be sacrificed for the other.</p> | <p>The proposal includes the provision of new trees and a planning condition should be imposed to require a detailed landscaping scheme, including a scheme of ecological enhancements. Any tree that is diseased or removed within 5 years would need to be replaced.</p> <p>The Arboricultural Officer has raised no objection to the submitted landscape strategy.</p> |
|---|---|

8. Recommendation

That planning permission be granted subject to the following conditions:

Conditions

1. Time Limit

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

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

2. Approved Drawings and Documents

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

378_P_400 Rev E; 378_P_401 Rev G; 378_P_402 Rev B; 378_P_410;
378_4_401 Rev D; 378_4_402 Rev B; 378_4_403 Rev B; 378_4_404;

378_4_405 Rev A; 378_4_406 Rev A; 378_4_407; 378_4_408;

378_4_409 Rev B; 378_4_410 Rev B; 378_4_411 Rev B.

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

3. Materials

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

Reason: To ensure that the proposed development applies high quality materials that makes a positive contribution to the character and appearance of the area. This is a pre-commencement condition to ensure that high quality materials are used and avoid any potentially abortive works.

4. Hard and Soft Landscaping

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

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

shall be submitted to and approved in writing by the Local Planning Authority. The approved landscaping scheme, with the exception of the planting, shall be completed prior to any occupation of the development. The proposed planting shall be completed not later than the first available planting and seeding season after completion of the development. Any new trees or plants which within a period of five years, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, or in accordance with details approved by the Local Planning Authority.

Reason: In the interests of the visual appearance of the site and to ensure that enhancements to biodiversity are provided in accordance with paragraphs 8c), 174d) and 180d) of the Framework and emerging Policy NE9.1 of the Final Draft Watford Local Plan.

5. Parking and Manoeuvring Area

Prior to the first occupation of the development hereby approved, surface water drainage details (including details of the construction of the hard surface and disposal of surface water) of the parking and manoeuvring area shall be submitted to and approved in writing by the Local Planning Authority. The parking and manoeuvring area shall be laid out in accordance with the drawings approved under Condition 2 and constructed in accordance with the approved drainage details prior to the first occupation of the development. The parking and manoeuvring area shall be retained at all times thereafter.

Reason: To ensure that adequate parking and manoeuvring space is provided and to ensure that surface water is drained within the site so as to minimise flood risk elsewhere.

6. Vehicular access

Prior to the first occupation of the development hereby approved, the new vehicular access shall be laid out and constructed in accordance with the details shown on drawing No. 378_P_401 Rev G. The vehicular access shall be retained at all times thereafter.

Reason: To ensure that safe access into the site is provided.

7. Bin and cycle stores

Prior to the first occupation of the development hereby approved, full details of refuse and recycling storage facilities and secure and weatherproof cycle storage facilities shall be submitted to and approved in writing by the Local Planning Authority. No part of the development shall be occupied until the storage facilities have been installed in accordance with the approved details. These facilities shall be retained as approved at all times thereafter.

Reason: In the interests of the visual appearance of the site and to ensure that adequate facilities for residents of the proposed development are provided. The cycle storage facilities are necessary to promote the use of sustainable modes of transport.

8. Obscure glazing

The upper floor windows in the north-western and south-eastern side elevations of the development hereby approved shall be (i) obscure-glazed, and (ii) non-opening unless the parts of the window which can be opened are more than 1.7 metres above the floor of the room in which the window is installed.

Reason: To protect the privacy of the occupiers of neighbouring properties.

9. Electric vehicle charging

Prior to the first occupation of the development hereby approved, 6no. active electric vehicle charging points shall be provided in accordance with the approved drawings. The electric charging infrastructure shall be retained at all times thereafter.

Reason: To ensure that the proposed development achieves high levels of sustainability in accordance with Policies SD1 and SD3 of the Watford Local Plan Core Strategy 2006-31 and paragraph 112 of the National Planning Policy Framework.

10. Permitted development rights removed

Notwithstanding the provisions of Article 3, Schedule 2, Part 1 of the Town and Country Planning (General Permitted Development) Order 2015 (or any modification or re-enactment thereof), no enlargements of a dwellinghouse permitted under Classes A, AA or B or erection of buildings permitted under Class E or provision of hard surfaces permitted under Class F shall be carried out or constructed without the prior written permission of the Local Planning Authority.

Reason: The removal of permitted development rights under Classes A, AA, B and E is necessary due to the modest size of the plots and to ensure that any developments are carried out in a manner which will not be harmful to the character and appearance of the area, and will not prove detrimental to the amenities of neighbouring occupiers. The removal of permitted development rights for the laying out of additional hard surfaces is necessary in the interests of the visual appearance of the site and to restrict additional on-site parking that could undermine the Council's sustainable transport objectives.

11. External machinery

Prior to the installation of external air source heat pumps or other external machinery, details of the siting and specification of the equipment shall be submitted to and approved in writing by the Local Planning Authority. The air source heat pumps/machinery shall only be installed in accordance with the approved details.

Reason: To protect the living conditions of the occupiers of neighbouring properties.

Informatives

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