

Committee date	Tuesday 7 February 2023
Application reference Site address	22/01126/FULM - 250 Lower High Street, Watford, WD17 2DB
Proposal	Demolish the existing vacant commercial building and erection of a six storey building comprised of 36 dwellings with associated development including amenity, refuse, cycle, car parking and plant space.
Applicant	Mr Alejandro Munoz
Agent	Benchmark Architects
Type of Application	Full Planning Permission
Reason for committee Item	Major Application
Target decision date	Wednesday 8 February 2023
Statutory publicity	Watford Observer, Neighbour Letters and Site Notice
Case officer	Andrew Clarke, andrew.clarke@watford.gov.uk
Ward	Central

1. Recommendation

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

2. Site and surroundings

- 2.1 The site is located on the south-western side of Lower High Street at the junction of Local Board Road, a short cul-de-sac. The site contains a part two part three storey 1980's red brick commercial building with hardstanding to the front and rear. The site is approximately rectangular in shape with an area of 0.09 hectares. The site contains no listed buildings or structures and is not within a conservation area.
- 2.2 The only adjoining site is Crosfield Court, a 1990's residential development containing 76 retirement flats and associated facilities. Facing the site on Local Board Road are 5 locally listed Victorian buildings comprising a former Industrial Building (number 1a), a short terrace of 2 storey dwellings (numbers 1, 2 and 3) and the Pump House Theatre (number 5). The surroundings on Lower High Street are varied. Opposite site is the rear servicing yard of Tesco Extra with car showrooms and car rental businesses occupying nearby sites. The site occupies a central, accessible location to the south of Watford Town Centre, approximately 300 metres from Watford High Street Overground Station.

2.3 The site is within Source Protection Zone 1 (SPZ1). This Environment Agency designation covers the River Colne basin identifying the catchment areas of sources of potable (drinking) water. The site is therefore highly sensitive to contamination. The site is within flood zone 1, the zone with the lowest risk of flooding.

3. Summary of the proposal

3.1 Proposal

3.2 Demolish the existing vacant commercial building and erection of a six storey building comprised of 36 dwellings with associated development including amenity, refuse, cycle, car parking and plant space.

3.3 Conclusions

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

3.5 The proposed development, by virtue of its scale and massing fails to successfully transition with or relate to the surrounding local context. The proposal would not contribute positively towards the character and appearance of the area and would conflict with paragraphs 126, 130, 132 and 134 of the NPPF and Policies CDA2.3, QD6.1, QD6.2, QD6.3, QD6.4 and HE7.1 HE7.3 of the Watford Local Plan 2021-2038.

3.6 The proposed development, by virtue of the high proportion of single aspect dwellings, the poor internal daylight levels and lack of and poor quality private amenity provision fails to provide high quality accommodation for future users, contrary to paragraph 130 of the NPPF, Policies HO3.10, HO3.11 and QD6.4 of the Watford Local Plan 2021-2038 and section 7.3 of the Watford Residential Design Guide 2016.

3.7 The proposed development, by virtue of its scale and massing would cause significant loss of light, loss of outlook and sense of enclosure to neighbouring residential dwellings within Crosfield Court and on Local Board Road. Such a loss of neighbouring amenity is contrary to paragraph 130 of the NPPF, Policies CDA2.3 and QD6.5(g) of the Watford Local Plan 2021-2038 and section 7.3 of the Watford Residential Design Guide 2016.

- 3.8 In respect of national policy, the NPPF states that high quality, beautiful and sustainable buildings is fundamental to planning (paragraph 126) and that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design (paragraph 132).
- 3.9 It is acknowledged that the proposed development would make efficient use of previously development land with the provision of 36 dwellings, and so would make a contribution towards addressing the shortfall in housing in Watford. However, the benefits of additional housing would be limited by the absence of any affordable housing and the poor quality of the homes provided. The limited benefit would be significantly outweighed by the adverse impacts of the development. In respect of Paragraph 11 d) of the NPPF the adverse impacts of the proposed development would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

4. Relevant policies

- 4.1 Members should refer to the background papers attached to the agenda. These highlight the policy framework under which this application is determined. Specific policy considerations with regard to this particular application are detailed in section 6 below.
- 4.2 Paragraph 11 d) of the National Planning Policy Framework establishes the 'presumption in favour of sustainable development', which applies where a local planning authority cannot demonstrate a 5 year housing supply or has failed to deliver at least 75% of their housing requirement as part of the Housing Delivery Test. The Council can demonstrate a 5 year housing supply but scored below 75% in the most recent Housing Delivery Test results, therefore paragraph 11d) applies. This means granting planning permission unless:
- i. the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

5. Relevant site history/background information

5.1 A pre-application request for demolition of the existing commercial building, and the construction of a 11 storey residential development providing a total of 48 residential units was submitted in April 2022 (application reference: 22/00496/PREAP4). A meeting was held and a written response was issued in June 2022.

5.2 An application for demolition of the existing commercial building, and the construction of a 5 storey residential development providing a total of 25 residential units was submitted in January 2021 (application reference: 21/00076/FULM). The application was recommended for refusal for the following reasons:

- The scale and massing of the proposal fails to integrate with the context,
- The poor quality of accommodation.
- The likely harm to the amenity of neighbouring residential units.
- The lack of Affordable housing or justification for not providing it.
- Car Parking pressure
- Unacceptable risk to controlled waters

The application was withdrawn on May 17th 2021, prior the May 18th 2021 Development Management Committee.

5.3 An application for demolition of the existing commercial building, and the construction of a 5 storey residential development providing a total of 28 residential units was submitted in January 2020 (application reference: 20/00072/FULM). The application was withdrawn by the applicant on 13th October 2020 following feedback from the case officer.

5.4 A pre-application request for demolition of the existing commercial building, and the construction of a 5 storey residential development providing a total of 30 residential units was submitted in June 2018 (application reference: 18/00746/PREAPP). A written response was issued in August 2018.

6. Main considerations

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

- (a) Principle of the proposed development
- (b) Layout, scale and design
- (c) Housing mix
- (d) Affordable housing
- (e) Residential quality
- (f) Impacts to neighbouring properties

- (g) Access, parking and transport matters
- (h) Environmental matters

6.2 (a) Principle of the proposed development

The application site is located within the Colne Valley Strategic Development Area (the Colne Valley SDA). Policy CDA2.3 of the Local Plan sets out strategic objectives for the wider area, and identifies that the Colne Valley SDA is designated to facilitate transformative and co-ordinated change around the River Colne and Lower High Street Area. This policy states:

In locations adjacent to existing residential areas, new development should be designed to minimise the potential impact on these areas by providing a transition in built form between existing homes and higher-density development.

- 6.3 Strategic Policy HO3.1 of the Local Plan states that proposals for residential developments will be supported where they contribute positively towards meeting local housing needs and achieving sustainable development. The principle of a residential development on this undesignated site is supported.
- 6.4 (b) Layout, scale and design
Chapter 12 of the NPPF sets out national policy for achieving well-designed places and key design qualities are set out in paragraph 130. Paragraph 134 of the NPPF states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design.
- 6.5 Strategic Policy QD6.1 seeks to deliver high quality design across the borough. The borough is divided into 3 distinct areas – Core Development Area, Established Areas and Protected Areas - with a separate approach for each area. The application site is within the Colne Valley SDA which forms parts of the Core Development Area where significant revitalisation and transformative change is expected to bring new investment into the town.
- 6.6 Policy QD6.2 gives more detailed design principles for new development including sustainable design, character and identity, built form, active frontages, connectivity and views. Policy QD6.3 seeks safe, accessible, inclusive and attractive public realm. Policy QD6.4 gives detailed design guidance on building design. Policy QD6.5 concerns building height and gives base building height of 6 storeys for the Colne Valley SDA.
- 6.7 Policy HE7.1 seeks to protect of the historic environment requiring developments to avoid causing harm to their significance, including their

setting. Policy HE7.3 gives more detail and specially relates to locally listed buildings (Non-designated heritage assets). It requires proposals to positively contribute towards heritage value.

- 6.7 This proposal would see the existing part two, part three storey building replaced by one which is part five, part six storeys. The footprint of the proposed building, unlike the exiting building would fill the entire site with small setbacks on all sides. The uppermost (sixth) storey would be set back from the main building line.
- 6.8 The rationale behind how the proposed massing was developed is explained in the Design and Access Statement (DAS). A five storey block which largely fills the site is taken as the starting point, then this block is been moulded to reduce the massing opposite the locally listed buildings on Local Board Road. As opposed to starting with the assumption of a five storey block being suitable the development of the massing should have considered key design principles, as outlined in Policy QD6.2, such as how the building relates to the local context.
- 6.9 The immediate local context is comprised of Crosfield Court, a four storey building which wraps around the site on two sides and two storey locally listed dwelling houses opposite on Local Board Road. The wider surroundings are varied, including two to three storey buildings and large retail warehouses. A six storey building on this site which is relatively narrow and fronts a narrow cul-de-sac does not relate well to the context, regardless of the base building height outlined in Policy QD6.5. Nevertheless, the appropriate height for any individual site must still reflect the balance between existing character, constraints and opportunities.
- 6.10 It is accepted that moving the footprint of the building closer to Lower High Street would restore some building frontage at the back of the pavement and animate the relationship with the public realm on Lower High Street, however, the proposed building has a narrow frontage with a chamfered end and tall, wide flank wall facing Crosfield Court. The substantial massing in front of Crosfield Court would appear dominant and discordant within the streetscene and adjacent to Crosfield Court which is substantially lower, wider and set well back from the public realm.
- 6.11 The proposed building line along Local Board Road would be set further back from the public realm than the existing building line, however, the building would be substantially deeper and higher than the building it replaces. Although the upper storeys are recessed, the proposed building would create an unacceptable sense of enclosure to Local Board Road which is a historic,

narrow cul-de-sac. The massing would overwhelm the small locally listed historic dwelling houses on the opposite side of Local Board producing a jarring relationship between the two.

- 6.12 Externally the building would be finished in red brick with lighter panels used on the recessed upper levels in an attempt to make the building less imposing. The narrow elevation facing Lower High Street would have larger openings and projecting balconies whereas the elevation facing Local Board Road has recessed balconies and appears akin to a row of terraced dwellings at the lower levels. Subject to further details the use of red brick could be acceptable, though the elevations contain details such as tall openings, vertical banding and black glazing / spandrel panels between the windows which emphasise the verticality and dominance of the building. The CGI image on page 66 of the Design and Access Statement demonstrates the visual dominance of the building in the context.
- 6.13 It is recognised that this site is within the Core Development Area where transformative change is expected, however, this site is narrow and constrained by existing residential development on three sides, including locally listed dwelling houses. It is recognised that the site is adjacent to a large allocated housing site at 252-272 Lower High Street (Glyn Hopkins car showroom) which may come forward for redevelopment, however, this adjoining site is located on a major road junction and has a very different context. In respect of the application site, the proportions of the building would be inappropriate to the existing and emerging character of the area contrary to Policy QD6.4.
- 6.14 (c) Housing mix
Policy HO3.2 of the Local Plan requires at least 20% of new homes as family sized (3+bed) in order to seek an appropriate mix of dwelling sizes to meet local need and in order to help contribute towards a balanced community. The development proposes 8 x 3 bed dwellings representing 22% of the development. The proposed housing mix is supported in accordance with this policy.
- 6.15 (d) Affordable housing
Policy HO3.3 of the Local Plan requires a 35% provision of affordable housing for all developments of 10 or more dwellings. This provision should have a tenure mix of which includes 60% social rent.
- 6.16 A financial viability appraisal (FVA) was submitted with the application, which seeks to assert that the proposal cannot viably provide affordable housing in accordance with the provision and tenure mix set out in Policy HO3.3. This has

been independently reviewed by consultants on behalf of the Council. Although some adjustments were recommended, the review has concluded that the development is unable to viably include affordable housing. Specifically, this finds that with the policy compliant provision of affordable housing, the proposed development has a deficit of £2,098,000 against a benchmark land value of £2,263,000. The development also remains unviable with no affordable provision, having a deficit of £731,000 below the benchmark land value of £2,263,000 for a 100% market scheme. Nonetheless, should the Council consider granting planning permission, a late stage review of viability would be secured to consider actual build costs and sale values. No explanation has been provided as to how the applicant intends to deliver the scheme given the outcome of the appraisal.

6.17 As such, it has been demonstrated that the proposal cannot viably provide affordable housing in accordance with the provision and tenure mix set out in Policy HO3.3 of the Local Plan.

6.18 (e) Residential quality

The proposed floor plans demonstrate compliance with the Technical Housing Standards – Nationally Described Space Standard (NDSS) in terms of the gross internal floor areas, ceiling heights, built-in storage and bedroom sizes.

6.19 Of the 36 dwellings proposed 26 (72%) would be single aspect facing Local Board Road. The reason for this high proportion is the linear layout of the building with all dwellings on upper levels accessed off a rear corridor which runs along the back of the building. Single aspect dwellings restricts opportunities for passive ventilation and good internal light.

6.20 A daylight and sunlight assessment has been undertaken of habitable rooms within the proposed building in accordance with Building Research Establishment's Report 209 "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice" (BRE Guide). This assessment tests the Daylight Factor (DF), Spatial Daylight Autonomy (SDA) and Sunlight Exposure (SE) in all 96 habitable rooms within the 36 dwellings.

6.21 The DF test sets daylight targets which should be achieved across 50% of a working plane measured at 850mm above floor level. This test sets three target levels of illumination: minimum, medium and high. These factors are set at 2.1%, 3.5% and 5.0% respectively. The daylight and sunlight assessment shows that 9 rooms (9.5%) would fail to meet the minimum target, 24 rooms (25.5%) achieve the minimum, 14 (15%) the medium and 47 (50%) the high.

6.22 The SDA test calculates the illuminance from daylight within a room at the working plane at hourly intervals for a typical year. Target illumination levels, which depend on room use should be achieved across at least 50% of the working plane in a day lit space for at least half of the possible daylight hours. The daylight and sunlight assessment shows that 34 (36%) of the habitable rooms fail this test. Of those which fail 21 (22%) achieve less than 25% of the 50% target. The illuminance of the working plane in some of the rooms is particularly low with one of the living / kitchen / dining rooms achieving only 2% of the required 50%.

6.23 The SE test suggests that a dwelling would appear reasonably sunlit provided:

- at least one main window wall faces within 90° of due south and
- a habitable room, preferably a main living room, can receive a total of at least 1.5 hours of sunlight on 21 March.

All of the dwellings would have one main window wall facing within 90° of due south. However 9 (9%) rooms fail to achieve the minimum 1.5 hours and 24 (25%) would achieve less than 3 hours. Four bedrooms would receive no sunlight at all.

6.24 Generally the dwellings on the upper levels achieve better results due to their orientation and elevated position above the level of the dwellings opposite on Local Board Road. The rooms which fail and achieve the poorest results against minimum targets are those which:

- have windows close to or facing Crosfield Court,
- are at lower levels of the building,
- have deep footprints behind recessed balconies.

6.25 The BRE guide explains that the numerical guidelines should be interpreted flexibly and the NPPF also recommends taking a flexible approach relating to daylight and sunlight as long as the resulting scheme would provide acceptable living standards. However, the Daylight Sunlight Assessment submitted suggests many rooms would significantly fail the both the DF and SDA tests. Furthermore, whole dwellings would be poorly lit throughout. Such poor results would create unacceptable living standards.

6.26 Policy HO3.10 states that all new housing will be designed and built to comply with accessibility standard M4(2) of the Building Regulations unless they are built to comply with standard M4(3). The planning statement asserts all would comply with M4(2) with 10% complying with the higher M4(3) standard.

- 6.27 Policy H03.11 explains that all new dwellings should be provided with private outdoor amenity space setting minimum standards. Five dwellings (14% of total) at fourth floor would have no private amenity space. The 4 dwellings which front Lower High Street have balconies which are 1 metre deep with a floor area of 3.5 square meters. These figures fall far short of the required depth of 1.5 metres and minimum floor area of 8 metres for 3 bedroom dwellings. At first and second floors the 4 dwellings nearest to the south west side of the building have balconies which also fall short of the minimum floor space standards requirements. The 5 dwellings at ground floor would have space in front of dwellings as private amenity space, though these spaces lack privacy and are unlikely to be used for private amenity given their position. Overall, 22 dwellings (61% of the total) fail to provide policy compliant high quality private amenity space.
- 6.28 Policy H03.11 also states that residential development comprising 10 or more flats should provide shared private outdoor amenity space that is high quality and accessible to all residents unless it would not be possible or appropriate to do so. The development does provide shared private outdoor amenity space on the roof. Subject to further detail demonstrating a high quality layout this provision is considered acceptable.
- 6.29 (f) Impacts to neighbouring properties
Paragraph 130 of the NPPF sets out principles for well-designed development including that developments are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users. The Residential Design Guide sets out guidance for appropriate relationships for new development with existing dwellings. The impact to neighbouring dwellings within Crossfield Court and on Local Board Road is considered below.
- 6.30 A daylight and sunlight assessment has been undertaken for the habitable rooms within the neighbouring buildings in accordance with Building Research Establishment's Report 209 "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice" (BRE Guide). This assessment tests the Vertical Sky Component (VSC) and Daylight Distribution (DD).
- 6.31 The VSC test measures of the amount of light falling on a window. The BRE Guide says that diffuse daylighting of the existing building may be adversely affected if the VSC measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value. The daylight and sunlight assessment shows that 12 habitable room windows within Crossfield Court and 16 habitable room windows fronting Local Board Road would fail this test.

- 6.32 Within Crosfield Court the dwellings most severely impacted are flat numbers 1, 19, 39 and 59 whose habitable rooms all face Lower High Street adjacent to the proposed building. All bedrooms in these units would fail the BRE test incurring light level reductions between 0.62 and 0.66. However the greatest harm would be incurred by the dwellings on Local Board Road where all forward facing habitable room windows fail the test incurring light level reductions between 0.62 and 0.75.
- 6.33 The DD test takes the VSC analysis a step further in looking at where in the room daylight is received at the working plane. After a development is complete, the area of a room with visible sky should, ideally be 0.8 times or more of the former area on the working plane prior to the development. The daylight and sunlight assessment shows that 6 rooms within Crosfield Court and 10 rooms fronting Local Board Road would fail this test.
- 6.34 Within Crosfield Court the same four bedroom windows in flat numbers 1, 19, 39 and 59 which fail the VSC test also fail the DD test. The greatest impact is to 4B Local Board Road with rooms which achieve levels at only 0.34 and 0.36 of their former value.
- 6.35 The windows which suffer the most significant reductions in light would also suffer the most acute loss of outlook and sense of enclosure given their proximity to and the proportions of the proposed building. For the above reasons, the proposal would cause an unacceptable loss of amenity to neighbouring properties and would conflict with paragraph 130 of the NPPF, Policy QD6.5(g) of the Local Plan and the Residential Design Guide.
- 6.36 The building has been designed to ensure habitable rooms and amenity spaces do not cause any significant loss of privacy to neighbouring residential dwellings. The communal corridor windows to the rear would face the communal corridor windows within Crosfield Court.
- 6.37 (g) Access, parking and transport matters
Strategic Policy SS1.1 and Policy ST11.4 of the Local Plan state that proposals will contribute towards a modal shift, greener travel patterns and minimising the impact on the environment. Pedestrian, cycling and passenger transport will be prioritised.
- 6.38 Policy ST11.5 sets out an approach to maximum parking standards pursuant to objectives for a modal shift in transport. The maximum standards as set out in Appendix E of the Local Plan state that in this area, a development of 36 dwellings should not exceed the provision of 10 car parking spaces. The proposed development includes one disabled space accessed via a

repositioned vehicle crossover on Local Board Road. This would be within the maximum parking standards of Appendix E.

6.39 The proposed parking provision is supported in respect of securing 'car-lite' development in this sustainable location. The site is within Watford Borough Council's Controlled Parking Zone F, which operates Monday to Saturday 8am to 6.30pm with additional restrictions on Watford Football Club match days. The development could be subject to an exemption to prevent future residents from entitlement to permits and to ensure that the development would not give rise to additional on road parking demand. A planning obligation in the form of a Section 106 agreement is required to secure this exemption. As no agreement has been secured for this application, this is a matter that merits a reason for refusal, however, this could be overcome with an appropriate agreement in place.

6.40 (h) Environmental matters

Source Protection Zone

The site is located within Source Protection Zone 1 (SPZ1) and used for potable water supply (that is high quality water supplies usable for human consumption). The Environment Agency (EA) carefully monitor development proposals of all types in this zone. The EA designate SPZ1 to identify the catchment areas of sources of potable water and show where they may be at particular risk from polluting activities on or below the land surface. On the basis that a non-piled shallow foundation will be used that does not penetrate into the chalk, as outlined in the Westlakes Engineering letter, the EA has no objection subject to conditions which could be imposed on any grant of permission.

6.41 *Surface Water Drainage*

Hertfordshire County Council (HCC) as the Local Lead Flood Authority have reviewed the flood risk assessment and confirm that they have no significant concerns recommending that the applicant follow the advice outlined in their response.

6.42 *Land contamination*

Watford Borough Council's Environmental Protection Officer is satisfied with the submitted ground investigation report, subject to a condition regarding unexpected contamination.

6.43 *Energy and Sustainability strategy*

Strategic Policy CC8.1 states that the Council will support proposals that help combat climate change and new development will need to demonstrate how it contributes positively towards this. Policy CC8.3 seeks to minimise the

impact of new housing on the environment through energy and water efficiency measures. This includes a 19% improvement in carbon emissions over the target emission rate in the Building Regulations 2013 and a standard of 110 litres of water use per person per day. The application is accompanied by an Energy Strategy Report detailing proposals for use of Air Source Heat Pumps (ASHP) and Photo Voltaic (PV) panels for energy generation in compliance with Policies CC8.1 and CC8.3.

6.44 *Biodiversity*

An Arboricultural Impact Assessment has been submitted which identifies a group of category C Leyland Cypress trees within Crosfield Court along the south western boundary of the site which overhang the boundary. The assessment asserts that these would be cut back to the boundary. Such severe works and the proximity of the proposed building would prejudice the health of these trees. Nevertheless, the landscape masterplan included in section 8.0 of the Design and Access Statement suggests biodiversity enhancement with new flowers, plants and trees around the building. Although a 10% biodiversity net gain has not been explicitly demonstrated in accordance with Policy NE9.8 of the Local Plan, this could be secured through a detailed soft landscaping plan.

7 Consultation responses received

7.1 Statutory consultees and other organisations

Name of Statutory Consultee / Other Organisation	Comment
Environment Agency	No objection subject to conditions and on the basis that a non-piled shallow foundation will be used which does not penetrate into the chalk.
Hertfordshire County Council (Growth & Infrastructure)	No objection. CIL contributions noted.
Hertfordshire County Council (Highways Authority)	No objection subject to conditions and informatives.
Hertfordshire County Council (Lead Local Flood Authority)	Responded with no significant concerns recommending that the applicant follow the advice outlined in their response.
Hertfordshire County Council (Minerals & Waste)	No objection subject to a condition.
Thames Water	No objection.
Affinity Water	No objection subject to conditions.

7.2 Internal Consultees

Name of Internal Consultee	Comment
Environmental Health	No objection subject to a condition.
Housing	The Housing Service did not support the application as no Affordable Housing is proposed.
Waste and Recycling	Sought clarification on pull distances. These are 10 metres at maximum.
Arboricultural Officer	Requested Arboricultural Impact Assessment, Method Statement due to proximity of trees within Crosfield Court. Additional information received, though additional comments were not received.

7.3 Interested Parties

Letters were sent to 95 properties in the surrounding area. Thirty responses were received in objection. The majority of objections were from residents of Crosfield Court. The main comments are summarised below, the full letters are available to view online:

Comments	Officer response
Impact on the character and appearance of the area.	See section 6.4 to 6.13 of the report which relates to layout, scale and design.
Lack of Affordable Housing	See paragraph 6.15 to 6.17 of the report which relates to affordable housing
Loss of light, outlook and privacy	See paragraph 6.29 to 6.36 of the report which relates to the impact on amenity of adjoining residential properties
Parking pressure and traffic impacts	See paragraph 6.37 to 6.39 of the report which relates to transport, parking and servicing
Risk to controlled waters	See paragraph 6.40 of the report which relates to controlled waters.
Flooding	See paragraph 6.41 of the report which relates to flooding.
Biodiversity	See paragraph 6.44 of the report which relates to biodiversity.
Disruption from construction	The Environmental Protection Act, the Control of Pollution Act and the Highway Act control the matters of disruption raised.
Loss of TV Signal	The loss of TV signal over a neighbouring

	site is not reason to restrict development opportunities.
--	---

8 Recommendation

That planning permission be refused for the following reasons:

Reasons

1. The proposed development, by virtue of its design, scale and massing fails to successfully transition with or relate to the surrounding local context. The proposal would not contribute positively towards the character and appearance of the area conflicting with paragraphs 126, 130, 132 and 134 of the NPPF and Policies CDA2.3, QD6.1, QD6.2, QD6.3, QD6.4 and HE7.1 HE7.3 of the Watford Local Plan 2021-2038.
2. The proposed development, by virtue of the high proportion of single aspect dwellings, the poor internal daylight levels and lack of and poor quality private amenity provision fails to provide high quality accommodation for future users, contrary to paragraph 130 of the NPPF, Policies HO3.10, HO3.11 and QD6.4 of the Watford Local Plan 2021-2038 and section 7.3 of the Watford Residential Design Guide 2016.
3. The proposed development, by virtue of its scale and massing would cause significant loss of light, loss of outlook and sense of enclosure to neighbouring residential dwellings within Crosfield Court and on Local Board Road. Such a loss of neighbouring amenity is contrary to paragraph 130 of the NPPF, Policies CDA2.3 and CC8.5 of the Watford Local Plan 2021-2038 and section 7.3 of the Watford Residential Design Guide 2016.
4. A legal undertaking has not been completed to secure financial contributions towards the variation of the Borough of Watford (Watford Central Area and West Watford Area) (Controlled Parking Zones) (Consolidation) Order 2010 to restrict the entitlement of the proposed dwellings to parking permits for the controlled parking zones in the vicinity of the site. Without such an undertaking in place, the development would result in additional on-street parking in an already congested area contrary to Policies ST11.1 and ST11.5 of the Watford Local Plan 2021-2038.