

PART A

Report of: **DEVELOPMENT MANAGEMENT SECTION HEAD**

Date of Committee: **18th September 2014**

Site address: **Land off Cardiff Road and between Wigenhall Road and Willow Lane and Dalton Way/Oxhey Park**

Reference Number : **14/00511/OUTM**

Description of Development: **Hybrid planning application for the development of a mixed-use health campus accessed from the approved Access Road comprising:**

- 1. Outline element for the construction of new hospital/healthcare accommodation, together with business, retail, office, food and drink, hotel, and leisure uses, and up to 681 new dwellings, safeguarding of land for the expansion of Laurance Haines primary school, new public spaces, play space and landscaping, associated car parking, access roads, footways and cycleways.**
- 2. Detailed element (business area south) for the construction of three industrial business units together associated vehicle and cycle parking, site landscaping and the creation of a new wildlife area.**

Applicant: **Watford Health Campus Partnership LLP**

Date received: **1st April 2014**

16 week date (EIA): **22nd July 2014**

Ward: **VICARAGE / CENTRAL**

SUMMARY

The development of a new Health Campus at the site has been a long term strategic objective of the Council. Outline planning permission was previously granted in 2010 for a masterplan for a major, comprehensive, mixed-use redevelopment of the existing hospital site and adjacent land at Cardiff Road industrial estate and the former Carriage Sheds site as a new Health Campus. This is now enshrined in Policy SPA3 of the Council's Core Strategy as one of the main elements of the spatial strategy for the Borough.

The current masterplan is an evolution of this previously approved masterplan and has been formulated to accommodate the changing circumstances of Watford General Hospital. Whilst the needs of the hospital are not known at the present time, nevertheless, the masterplan achieves many of the key aims and objectives of Policy SPA3. It will redevelop significant areas of degraded brownfield land, safeguard land for the future expansion and improvement of Watford General Hospital and deliver a major new, mixed use urban quarter within west Watford. It will also deliver a new access road to serve the hospital and the wider masterplan site, previously approved in December 2013. Although, with the exception of Business Zone South, the details of the masterplan are not known, there is no planning reason why a successful, high quality development cannot be achieved at reserved matters stage.

A proposal of this scale inevitably raises many planning and environmental issues and the masterplan has been subject to a full environmental impact assessment. Although many potential impacts have been satisfactorily addressed, as set out in this report, there are a number of outstanding matters where more work is required. Of particular significance are matters relating to the provision of education facilities, particularly at early years, nursery and primary level; how the adverse impacts of the development on ecology and biodiversity are to be mitigated, particularly within the River Colne and its valley; the extent to which the development is able to provide adequate and high quality open space and green infrastructure within the site; and the adequacy of the sewerage infrastructure to serve the proposed level of development.

Your officers consider that these are all capable of a satisfactory resolution and are aware that discussions are on-going with respect to all of these issues but they, ultimately, will require the agreement of the applicant. They are, however, fundamental to the acceptability of the application in planning terms. The failure of the applicant to reach a satisfactory resolution to each of these matters is likely to be fatal to the application. On balance, therefore, it is considered that the application can be recommended for approval subject to these various outstanding matters being satisfactorily resolved.

The Development Management Section Head therefore recommends that the application is approved, subject to the completion of a planning obligation under s.106 of the Town and Country Planning Act 1990 in accordance with the Heads of Terms set out in Recommendation (B) and to the imposition of appropriate planning conditions as referred to in Recommendation (C). Recommendation (D) seeks delegated authority for the final text of the planning obligation and the planning conditions to be determined by the Development Management Section Head in consultation with the Chair of the Development Control Committee and the Planning Portfolio Holder.

BACKGROUND

Site and surroundings

The application site has an area of 26.5 hectares and is located predominantly within Vicarage Ward in West Watford. It comprises a number of different sites including Watford General Hospital, Cardiff Road Industrial Estate, the former Willow Lane Allotments site, the former Carriage Sheds site (off Wiggenhall Road) and the Oxhey playing fields. Areas adjoining the site to the west, north and east are predominantly residential, comprising the Victorian terraced housing of West Watford, although immediately abutting the site to the east is Vicarage Road Stadium and the Farm Terrace Allotments. To the south is the open public space of Riverside Park and Oxhey Park.

The buildings of Watford General Hospital occupy the northern part of the site with access from Vicarage Road. This part of the site has developed over many years in an ad hoc manner with a wide range of different buildings which also includes the original Union Workhouse building, which is a Grade II listed building fronting Vicarage Road. Adjacent to and immediately to the south of the building complex are open car parks serving the hospital. The former Willow Lane Allotments are sited immediately to the west of the car parks. These allotments have not been used for many years and now comprise self-seeded woodland. To the south of the car parks, occupying the central part of the site, is the Cardiff Road Industrial Estate which is accessed from Cardiff Road. This is currently largely vacant with only two occupiers remaining and is now much degraded. The southern part of the site comprises open land. The former Carriage Sheds site, on the north side of Wiggshall Road with access directly from this road, is partly occupied by commercial open storage uses and is partly open scrub. To the south side of Wiggshall Road, also with direct access from this road, is Oxhey playing fields and the Irish Centre. The Irish Centre is not, however, part of the application site and is to remain.

Overall, the site is very mixed in character ranging from the large scale, high density buildings of the hospital to the open public space of Oxhey playing fields. However, with the exception of the latter, the site generally comprises poor quality buildings and degraded land resulting in a very poor quality environment.

Proposed development

The planning application is a 'hybrid' application in that it seeks outline planning permission for the mixed-use master plan, and detailed planning permission for the first phase of the development. The full description of development is as follows:

"Hybrid planning application for the development of a mixed-use health campus on land at and adjacent to the Watford General Hospital and the surrounding area between Vicarage Road, Willow Lane and Cardiff Road, comprising:

1. Outline element for site clearance and ground remodelling and the construction of new hospital/healthcare accommodation (Class C2) and ancillary uses, together with employment uses comprising business (Classes B1, B2 and B8), retail (Class A1), offices (Class A2), food and drink (Classes A3-A5), hotel (Class C1), leisure (Class D2), and up to 681 new dwellings (Class C3), safeguarding of land and facilitating works for the expansion of existing Laurance Haines primary school (Class D1), new public spaces, play space and landscaping, associated car parking, new vehicular access roads, footways and cycleways (including new river footbridges) linked to the new Access Road and bridge from Wiggshall Road and Link Road from Dalton Way (the highways infrastructure works permitted under planning permission 13/00971/FULM), together with utilities infrastructure and other ancillary works.

2. Detailed element (business area south) for the construction of three industrial business units (Class B1c, B2 and B8), together with the formation of a new vehicular access linked to the new Access Road and bridge from Wiggshall Road and Link Road from Dalton Way (the highways infrastructure works permitted under planning permission 13/00971/FULM), associated vehicle and cycle parking, site landscaping and the creation of a new wildlife area, together with utilities infrastructure and other ancillary works.”

A second, separate but linked, outline planning application has also been submitted for the development of the Farm Terrace Allotments land under planning ref. 14/00512/OUTM. Although this application will be the subject of a separate report and is not for determination at this time, the two applications together comprise the single masterplan for the Watford Health Campus development.

The hybrid masterplan application can be summarised as follows:

1. Outline element for mixed use including:
 - a) Regeneration of the existing hospital site and extension of hospital facilities to provide health and ancillary uses (C2).

- b) Provision of new car parking in connection with the operation of the hospital.
- c) Incorporation of new commercial uses including retail (A1), office (A2), food and drink (A3-A5), hotel (C1), business (B1, B2 and B8), and leisure (D2) and associated car parking.
- d) Up to 681 new residential units including a mix of houses and flats (C3) and associated car parking.
- e) Safeguarding of land for the expansion of the Laurance Haines primary school and associated access works.
- f) Creation of vehicle access serving the development – all roads, footways and cycleways not covered under the existing planning permission for a new link road and access road (ref. 13/00971/FULM).
- g) Formation of new parks, pedestrian footpaths, river footbridges and play spaces.
- h) Associated site clearance, adjustments to existing ground levels and associated services, utilities and infrastructure required to deliver the master plan.

2. Detailed element for:

- a) Three business units (B1c, B2 and B8) totalling 6,950m² (GIA).
- b) Formation of new vehicle access and car parking.
- c) Associated landscaping and formation of new riverside wildlife area.

The total floorspace figures can be summarised as follows:

Use	Use Class	Floorspace (m ²) (GEA)
Hospital	C2	25,960
Offices/laboratories	B1(a), B1(b)	3,685
Retail/commercial	A1, A2, A3, A4, A5	5,620
Residential (681 dwellings)	C3	55,988
Hotel (80 rooms)	C1	3,000
Business/commercial	B1(c), B2, B8	8,477 (GIA)
Leisure	D2	1,719

Outline element

The outline masterplan element of the application is set out very broadly in a series of parameter plans:

Parameter Plan: Development Areas and Land Uses

This defines 7 development areas across the site and gives the proposed uses, maximum floorspace for each use and maximum number of dwellings for each development area:

i) Existing Hospital site

This development area includes the existing PMOK, AAU, Maternity, listed I-Block, Sycamore House and Willow House buildings but excludes the Shrodells building which is in separate ownership. No development is proposed within this area as part of the masterplan application with all of the main buildings to be retained in their current form and use.

ii) The Hub

This development area is sited adjacent to PMOK and Maternity to the west and Vicarage Road Stadium to the east. It includes various hospital buildings and car parking areas to be demolished and the existing energy centre which is to be retained. This area will provide for the following uses:

●	Hospital (C2)	7,800m ²
●	Offices/laboratories (B1(a), B1(b))	3,685m ²
●	Retail (A1-A5)	1,015m ²
●	Hotel (C1)	3,000m ²

iii) Central

This development area is within the central part of the site and includes the existing pathology building, temporary surge wards and the hospital visitor car parks, all to be demolished, and part of the Cardiff Road industrial estate. It is located to the north of the Access Road. This area will provide for the following uses:

- Hospital (C2) 18,160m²
- Retail (A1-A5) 4,605m²
- Leisure (D2) 690m²
- Residential (C3) (149 dwellings) 11,460m²
- Public car parking 24,156m²

iv) Cardiff Road

This development area is located in the east of the site and includes the eastern part of the Cardiff Road industrial estate on the northern side of the Access Road. This area is currently used to provide car parking for hospital staff and also contains a number of vacant industrial buildings, all to be demolished. This area will provide for the following uses:

- Residential (C3) (72 dwellings) 6,244m²
- Leisure (D2) 1,029m²
- Hospital car parking 16,060m²

v) Riverside

This development area is located along the northern bank of the River Colne to the west of the disused railway line (the new Croxley Rail Link) and to the south of the Access Road. This area will provide for the following uses:

- Residential (C3) (460 dwellings) 38,284m²

vi) Business Area North

This area is located on part of the former Carriage Sheds site to the north of the Access Road. This area will provide for the following uses:

- Business/commercial (B1(c), B2, B8) 1,527m² (GIA)

vii) Business Area South

This area is located on part of the former Carriage Sheds site to the south of the Access Road and comprises the detailed element of the application. It includes a new wildlife area adjacent to the River Colne and will provide 3 buildings comprising 7 units for the following uses:

- Business/commercial (B1(c), B2, B8) 6,950m² (GIA)

Parameter Plan: Pedestrian and Green Links

This shows the key pedestrian routes that will form the structure of the masterplan and allow full permeability across the site for pedestrians. It includes a north-south link from Vicarage Road down through the centre of the site to the River Colne which then extends under the Croxley Rail Link to join with the Ebury Way. An east-west link between Stripling Way and Cardiff Road will maintain the informal route that currently exists through the Cardiff Road industrial estate. In addition to these routes, the new access road between Wiggshall Road and Willow Lane will provide a further new route across the site. The plan demonstrates how the masterplan will link into the existing footpath network.

This plan also sets out the requirements for open space and play facilities to be provided across the masterplan site. This includes a minimum area of 1.83 hectares of open space, 2 local equipped areas of play (LEAPs) and 5 local areas of play (LAPs).

Parameter Plan: Vehicular Access

This shows the main vehicular access routes through the site and the access points for each of the development areas. This is centred around the new Access Road approved in December 2013. The northern part of the masterplan site, comprising the Existing Hospital, the Hub and northern part of the Central development areas, will be accessed from Vicarage Road via the existing entrance (to be improved) and from Willow Lane via the new roundabout at the southern end of this road. This latter roundabout will also give access to the western part of the Riverside development area and the safeguarded land for the expansion of Laurance Haines school. The new Access Road from Wiggshall

Road will give access to both of the Business Areas, the eastern part of Riverside, the southern part of Central and the western part of Cardiff Road development areas. The eastern part of the Cardiff Road development area will be accessed from Cardiff Road but there will be no vehicular link through to the Access Road and the rest of the masterplan site. There will also be no vehicular link between the Access Road and Willow Lane as the central section of this road will be for the use of emergency vehicles only. This will be controlled by an automatic number plate recognition system (ANPR) which is a requirement of the planning permission for the Access Road.

Parameter Plan: Maximum Building Heights

This takes the form of a grid over the masterplan site which gives the maximum heights for buildings above ordnance datum (AOD). The maximum height steps down the valley side towards the River Colne to ensure that the development reflects the fall in levels across the site whilst also ensuring the scale of buildings reduces accordingly from the large scale buildings of the hospital and Vicarage Road Stadium to more domestic scale buildings close to the river. This is supported by three *Parameter Sections* plans which show the maximum building heights relative to existing ground levels.

An illustrative masterplan drawing has been submitted with the application to give a visual expression to the parameter plans and show how the various development areas could be developed. This gives an overall picture of how the Health Campus development could look in the future when fully developed, based upon these parameters, and how the various buildings are intended to relate to each other, the River Colne and the surrounding area. However, there are many unknowns at present, particularly relating to the form and nature of the hospital development. Consequently, this illustrative masterplan is not for approval.

Detailed element

The detailed element of the application comprising Business Area South is accompanied by a full set of detailed drawings and these will form part of a detailed permission in any planning permission granted. This is an elongated site between the River Colne and the

new Access Road and comprises 3 two storey buildings. The access to the site will be directly from the Access Road.

The main building is located in the eastern part of the site towards Wiggshall Road and measures 100m long by 40m wide. It will provide 4,883m² floorspace (GIA) and is intended for Class B8 warehousing use for a specific occupier. It will have 85 car parking spaces. The two other buildings will be located within the central part of the site and will each measure 41m by 20m and each comprise 3 units. The 6 units will vary in size from 296m to 410m and are intended for light industrial (Class B1(c)), general industrial (Class B2) and warehousing (Class B8) use. These units will have 43 car parking spaces. Cycle parking and bin stores will also be provided.

The western part of the site and the area along the river bank will form a new wildlife area based around retained existing woodland. This area will also include two attenuation ponds as part of the sustainable drainage system for the site and the Access Road.

Planning history

The redevelopment of the Watford Health Campus site (or parts of it) has been under consideration for a number of years. In 2001, two inter-linked planning applications were submitted for the regeneration of the Cardiff Road Industrial Estate and surrounding area. These planning applications were granted planning permission in 2002 but have never been implemented. Opportunities for a wider more beneficial holistic redevelopment project became apparent and as a result the independent development of the Cardiff Road Industrial Estate was not pursued. In 2007, an outline application was submitted for a new masterplan for the redevelopment of a larger site comprising Watford General Hospital, Cardiff Road Industrial Estate, the former Carriage Sheds site off Wiggshall Road and Oxhey Park playing fields, an area of 26.4 hectares (65.2 acres):

07/00958/OUTM – Outline planning permission for the development of a mixed use Health Campus comprising major acute hospital (Class C2), office and research facilities (Class B1), retail, financial and restaurant uses (Class A1, A2 and A3), hotel (Class C1),

residential (Class C3), clinics, crèche and nursery (Class D1), formal leisure facilities (Class D2), combined heat and power plant, lake and informal leisure facilities, access road and bridge from Wiggenhall Road and link road from Dalton Way.

This application was considered by the Development Control Committee in December 2007 and May 2008 and was granted outline planning permission in July 2010 following the completion of a Section 106 agreement.

Due to the difficult economic conditions since this planning permission was granted and the changing requirements of the West Hertfordshire Hospitals NHS Trust (WHHT) the approved masterplan has undergone a fundamental reconsideration in order to formulate a new masterplan that is capable of being delivered. In 2012, Kier Project Investment Limited (Kier) was selected as preferred bidder to join the Council in the establishment of a Local Asset Backed Vehicle (LABV) to deliver the new Health Campus project. In September 2013 an application was submitted for a new access road to serve the future Health Campus development:

13/00971/FULM - Demolition of existing Cardiff Road Industrial Estate buildings and structures, construction of a new hospital access road (comprising the Access Road and Link Road) between Dalton Way and Willow Lane comprising new carriageway, footpaths and cycleways, new railway over-bridge (vehicular and pedestrian/cycle), formation of new road junctions with Dalton Way, Willow Lane and Wiggenhall Road, embankments, drainage works, ground remodelling and flood compensation works, landscaping (permanent and interim), retention of temporary hospital car parking and provision of replacement temporary hospital car parking areas (temporary access via Vicarage Road) construction compounds, soil remediation facility, utilities and other ancillary works. Planning permission was granted in December 2013.

In addition to the current hybrid masterplan application, a separate outline planning application has also been submitted for the Farm Terrace Allotments site (ref. 14/00512/OUTM). This application has not yet been determined.

Relevant Policies

National Planning Policy Framework

Section 1	Building a strong, competitive economy
Section 4	Promoting sustainable transport
Section 6	Delivering a wide choice of high quality homes
Section 7	Requiring good design
Section 8	Promoting healthy communities
Section 10	Meeting the challenge of climate change, flooding and coastal change
Section 11	Conserving and enhancing the natural environment
Section 12	Conserving and enhancing the historic environment

Hertfordshire Waste Core Strategy and Development Management Policies

Document 2011-2026

1	Strategy for the Provision for Waste Management Facilities
1a	Presumption in Favour of Sustainable Development
2	Waste Prevention and Reduction
12	Sustainable Design, Construction and Demolition

Hertfordshire Minerals Local Plan Review 2002-2016

No relevant policies.

Watford Local Plan: Core Strategy 2006-31

SS1	Spatial Strategy
SPA3	Health Campus
SD1	Sustainable Design
SD2	Water and Wastewater
SD3	Climate Change
SD4	Waste
TLC1	Retail and Commercial Leisure Development
TLC2	Neighbourhood Centres

HS2	Housing Mix
HS3	Affordable Housing
EMP1	Economic Development
T2	Location of New Development
T3	Improving Accessibility
T4	Transport Assessments
T5	Providing New Infrastructure
INF1	Infrastructure Delivery and Planning Obligations
UD1	Delivering High Quality Design
UD2	Built Heritage Conservation
GI1	Green Infrastructure
GI3	Biodiversity
GI4	Sport and Recreation

Watford District Plan 2000

SE7	Waste, Storage, Recovery and Recycling in New Development
SE20	Air Quality
SE22	Noise
SE23	Light Pollution
SE24	Unstable and Contaminated Land
SE26	Watercourses
SE27	Flood Prevention
SE28	Groundwater Quality
SE36	Replacement Trees and Hedgerows
SE37	Protection of Trees, Woodlands and Hedgerows
SE39	Tree and Hedgerow Provision in New Development
T21	Access and Servicing
T22	Car Parking Standards
H10	Planning Agreements for Educational and Community Use
E1	Employment Areas
E2	Employment Use Outside Identified Employment Areas

E5	Environmental Considerations
S11	Use Class A3 Food and Drink
S12	Planning Conditions for Use Class A3 Food and Drink
L8	Open Space Provision in Housing Development
L9	Children's Play Space
CS9	Health Provision

CONSULTATIONS

Neighbour notifications

Letters were sent out to 501 individual properties in Wiggshall Road, Cardiff Road, Liverpool Road, Stadium Way, Riverside Road, Willow Lane, Rose Gardens, Vicarage Road and Stripling Way. Fourteen replies have been received with 3 letters in support of the application (Watford and West Herts Chamber of Commerce, West Hertfordshire Hospitals NHS Trust and One Watford) and 11 letters raising objections to the application.

The letters of support can be summarised as follows:

- i) Watford and West Herts Chamber of Commerce

The Chamber has submitted an extensive 16 page letter of support. The conclusions of the letter to summarise their support are:

“The Chamber’s support is given to the WHC proposals. The regeneration of vacant and underused land surrounding WGH has been a long-standing strategic objective of WBC and the economic and regeneration benefits of this have previously been recognised through the 2010 outline consent for the WHC masterplan and the allocation of the site as a SPA in the 2013 adopted Core Strategy.

The regeneration and economic benefits of the scheme can be summarised as:

- delivering new and enhanced healthcare facilities as part of a new health campus, supporting existing jobs and creating opportunities for new jobs in the health sector;
- providing a range of new high quality and flexible commercial and business space to encourage the location of new businesses into Watford. This in turn will create new jobs and provide more suitable premises for existing businesses to retain jobs and encourage business start-up and growth;
- delivering new jobs in conjunction with new homes with the first development zone to provide new business units to meet the need for good quality employment space;
- creating new jobs through the creation of new local shops and leisure uses and in creating a vibrant and active local centre, encourage local people to visit and spend time in the new neighbourhood, enjoying its facilities;
- bringing large areas of under-used, derelict and contaminated land back into a productive use;
- overall, looking to facilitate the creation of over 1,000 new jobs to contribute to and support the local economy and community;
- increasing housing provision in the borough to meet recognised need, by increasing the supply of a mix of new homes with 35% of all new homes to be affordable; and
- providing new and enhanced green spaces and public areas and enhanced access to the River Colne corridor providing leisure and recreation opportunities.”

ii) West Hertfordshire Hospitals NHS Trust

“West Hertfordshire Hospitals NHS Trust has been a key partner in the development of the Watford Health Campus redevelopment from the outset. The Watford Health Campus is essential to provide an economically and socially sustainable development with good transport and access links to help the regeneration of west Watford.

The new road which will serve the hospital and will provide much faster access for ambulances received planning permission in December 2013. This was the first step in

the opportunity for us to enhance and develop our hospital buildings and allow us to plan for the future.

The two planning applications that have been submitted for the Health Campus ... both include plans for new hospital buildings. Future expansion zones have been provided within each of the planning applications and this safeguards land for us to be able to develop an appropriate strategy for an efficient and effective hospital layout. We have worked closely alongside the Health Campus Partnership to develop these plans and to safeguard future development space for the hospital in the optimum locations on the site. The plans that have been submitted will give us our required flexibility and will not restrict any future development opportunities for us on this site as we continue to develop our Clinical Strategy.”

iii) One Watford

One Watford has submitted a 6 page letter of support. Its support for the application is summarised as follows:

“The One Watford partnership, as the borough’s Local Strategic Partnership, represents a number of key organisations, businesses and public sector bodies that all have a role in shaping the future of the town, through on-going sustainable development and improving the social, environmental and economic well-being of the town’s residents.

Overall, the partnership is in support of the Watford Health Campus. The planning applications outline a scheme that will deliver a sustainable development that will contribute to the social, environmental and economic well-being of the town’s residents. In particular, the partnership would endorse the opportunity the Health Campus offers to:

- develop facilities and services at Watford Hospital;
- create new business and work opportunities: with premises and facilities to attract new businesses to west Watford and creating up to 1,000 new jobs;
- build 750 much needed new homes, including affordable homes;

- create green, open spaces for the whole community to enjoy;
- develop local community facilities: with a new community hub at the heart of the Health Campus;
- clean-up of former industrial and contaminated land.”

The objections to the application are summarised below. It should be noted that several of the objections relate specifically to the development of the Farm Terrace Allotments site (principally the loss of the allotments) which does not form part of this application. As such, these objections are not relevant to this application and have not been included here. Brief officer comments are given in *italics*.

- Object to scale of development and impact it will have on residents. Gross and unsustainable over-development.

The Health Campus is a large scale, high density urban development as set out in Policy SPA3. Based upon the information submitted, it is considered that the level of development proposed (set as maxima) can be accommodated on the site satisfactorily.

- Proposal does not include plans for a new hospital. The building of a new hospital should be a specific prerequisite of any approval. Calling development a Health Campus when there is no current time plan or even declared intention by the hospital to increase its service provision is misleading. There are no plans for a new hospital.

The NHS Trust aim to adopt a new clinical strategy next year which will inform their proposals for improving the existing hospital. The masterplan safeguards the land likely to be needed in the future, as agreed with the NHS Trust.

- Should be a prerequisite of any approval for the provision of key public services like primary and secondary schools. New school should be built for the new residents; expanding Laurance Haines would not be adequate.

The proposed expansion of Laurance Haines school would not meet the identified demand for primary school places as currently proposed. This matter is still being negotiated with Hertfordshire County Council.

- Scale of residential development together with proposed commercial development will exacerbate existing traffic congestion in West Watford.
A very detailed Transport Assessment has been undertaken which concludes that the level of traffic generated is predicted to be slightly less than that for the previously consented masterplan. The Transport Assessment has been agreed by Hertfordshire County Council.
- Road layout will result in increased traffic congestion especially on Wiggshall Road. Cycling on Wiggshall Road will also be more dangerous.
The new junction on Wiggshall Road was approved as part of the highways infrastructure works application in December 2013.
- Insufficient public transport provision. Too far to walk to bus stops and proposed Vicarage Road station on Vicarage Road.
The site is well served by bus stops on Vicarage Road. The approved Access Road and overall masterplan gives opportunity for increased bus penetration in to the site. It is the intention to provide 2 bus stops within the site, subject to agreement with the relevant bus operators. The new underground station proposed for Vicarage Road as part of the Croxley Rail Link is within acceptable walking distance of the site (410m).
- No need for more business floorspace as plenty of vacant floorspace in Watford.
Policy SPA3 requires new business floorspace to be provided on the site to contribute towards meeting the employment targets of the Core Strategy.
- Loss of Willow Lane woodland and consequent loss of quiet space and wildlife.
The Willow Lane woodland will be permanently lost as a result of the masterplan although some remnants may be retained. The loss of this as both open space and as an ecological asset is a significant adverse impact of the masterplan. This loss can be partially mitigated by the provision of new open space on the site and biodiversity off-setting elsewhere in the River Colne valley.
- Council should wait for hospital review to be completed next year.
The delays in the production of a new clinical strategy by the NHS Trust and the subsequent time that will be required before firm decisions can be made regarding new hospital provision should not delay the commencement of the Health Campus

development which is an important strategic objective of the Core Strategy.

- Cardiff Road should not be used for construction traffic.

Detailed construction management plans will be required for each phase of development that will include the routing of construction vehicles. It is not the intention of the applicant to use Cardiff Road for construction access.

Advertisements in local paper/ site notices

A public notice was published in the Watford Observer on 11th April 2014 and 21 site notices were put up on the roads surrounding the application site, also on 11th April 2014.

Consultations

National Grid

A holding objection was made on 2nd May 2014 in respect of a high voltage transmission underground cable. However, the pilot cable referred to in the objection is not in use by National Grid and is now owned by UK Power Networks. A subsequent letter dated 23rd May 2014 confirmed that it now has no objection to the application.

Highways Agency

Makes no objection to the proposal but directs that the following condition be attached to any planning permission granted:

“Levels of construction and occupation must not exceed the various development combinations outlined in Section 10.4 (Tables 10.6 and 10.7) of the Transport Assessment dated March 2014 without the implementation of the highway improvements consisting of the upgrading of the current signal control to MOVA at M1 Junction 5.”

Natural England

No comments have been received.

Network Rail

No comments have been received.

Thames Water

Waste Comments

Following initial investigation, Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Should the Local Planning Authority look to approve the application, Thames Water would like the following 'Grampian Style' condition imposed. "Development shall not commence until a drainage strategy detailing any on and/or off site drainage works has been submitted to and approved by the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed". Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community.

Surface Water Drainage

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

There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually

refuse such approval in respect of the construction of new buildings, but approval may be granted in some cases for extensions to existing buildings.

Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.

No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure.

Supplementary Comments

A developer funded impact study has been carried out for this site, investigating the potential impact of the development flows on the foul water network. The study highlighted the proposed development will have a detrimental effect on existing levels of service within the existing foul sewer system upstream of the development. Further investigations are underway, in order to determine any necessary solution/upgrade options. The drainage strategy has therefore not yet been confirmed.

Environment Agency

As you are aware from our telephone conversations, we had some initial concerns with the proposals due to the lack of buffer zone provided next to the river, and that the structures in the river channel were not identified for removal. Such proposals are not acceptable for the opportunities provided by a scheme of this scale and vision. We are

pleased that we have been able to work with yourselves and the developer during the planning process to address these issues.

The Thames river basin management plan (RBMP) requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery. The River Colne water body is currently of moderate ecological status. The removal of the river structures through this site will contribute towards the restoration of this water body, as required under the RBMP by 2027. Applicants must consider Water Framework Directive (WFD) objectives in their development proposals and local authorities are required to have regard for RBMPs when making planning decisions. We now consider that planning permission could be granted for the proposed development as submitted if the following planning conditions are included as set out below. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would object to the application.

Flood Risk

Condition 1

Prior to each phase of development, a scheme to address flood risk will be submitted to and approved in writing by the local planning authority. The scheme must be in accordance with the approved Flood Risk Assessment (FRA) prepared by AECOM dated March 2014. The scheme must include the following mitigation measures detailed within the FRA:

1. The surface water drainage scheme for the site shall be based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development. The drainage strategy should demonstrate the surface water run-off generated up to and including the 100 year critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event. Details of how the scheme shall be maintained and managed after completion must be included.
2. Finished floor levels are set no lower than the 1 in 1000 year flood event design level.

3. Flood compensation works as determined by any buildings encroaching into the 100 year climate change design level.
4. Resilience measures as indicated to direct flood flows away from buildings by land shaping.
5. Providing safe dry access/egress to higher ground from any buildings within the 100 year climate change flood envelope.

Condition 2

The design of any new bridges over a designated 'main river' watercourse will be submitted to and approved in writing by the local planning authority. The details shall demonstrate that the bridges are free-spanning over the watercourse with the abutments set back a minimum of one metre from the top of the riverbank on the landward side and with a soffit level in excess of the 100 year climate change level with an appropriate freeboard.

Condition 3

No built footprint shall be constructed within the 100 year climate change baseline flood envelope with the Tributary flows and updated topographic survey data included (see drawing 60288684-INF-SK14 Rev 3.0 in Appendix 2 of the Flood Risk Assessment prepared by AECOM dated March 2014) until after the works to open up and improve the flow capacity of the Wiggshall Tributary Ditch have been completed. Completion of these tributary works must be demonstrated to and approved by the local planning authority.

Local and national policy context for conditions 1-3

Conditions 1-3 are supported by your local plan policy SE27 on flood prevention, which states that the Council will resist any development which has potential to contribute to flood risk. They are also supported by paragraph 100 of the National Planning Policy Framework (NPPF) whereby development in areas at risk of flooding should be made safe without increasing flood risk elsewhere.

River Colne corridor

Condition 4

Prior to each phase of development adjacent to the river, a landscape management plan for the River Colne corridor shall be submitted to and approved in writing by the local planning authority. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority. The scheme shall include, but is not limited to, the following elements:

- details of the river channel buffer zones
- details of the sustainable drainage features

This condition is supported by paragraph 109 of the NPPF which recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. Paragraph 118 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should be encouraged. The Natural Environment and Rural Communities Act requires local authorities to have regard to nature conservation and Article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity.

Condition 5

No development shall take place until a masterplan for the River Colne corridor (to be known as the river corridor masterplan) demonstrating compliance with the objectives of the Thames river basin management plan (RBMP) has been submitted to and approved in writing by the local planning authority. This must include:

- a) removal of the side channel sluice and weir
- b) works to the side channel inlet

- c) bridges over the river
- d) any other impact to the river both during construction and operation
- e) alternative compensatory river enhancement works should part (a) or (b) above be demonstrated to be unfeasible.

Prior to each phase of development adjacent to the River Colne, a detailed scheme shall be submitted in accordance with the river corridor masterplan to be approved in writing by the local planning authority. The works shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

Reason

To maximise Water Framework Directive outcomes on site. The Thames RBMP requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery. The River Colne water body is currently of moderate ecological status. The RBMP aims for it to achieve good ecological status by 2027.

Reasons for failure of this water body include physical modifications to the river channel and barriers to fish passage. 'Fish easement' has been identified as a specific action for both the side channel sluice and weir to enable the river to return to good ecological status. Removal of these structures would complete these actions and improve the resilience of the River Colne to future impacts including climate change. If these structures were not removed, this would prevent the recovery of the river for the lifetime of the development.

This stance is supported by paragraph 109 of the NPPF, which requires the planning system to provide net gains in biodiversity by establishing coherent ecological networks that are more resilient to current and future pressures. Paragraph 2 of the NPPF requires planning decisions to reflect and promote relevant EU obligations and statutory requirements such as the Water Framework Directive.

This position is supported by your local plan policy SE26 on watercourses, that the Council will support initiatives which protect and enhance river corridors. Your draft core strategy policy SD2 on water also describes that the Council will work with the Environment Agency to ensure opportunities to protect and enhance aquatic habitats and water-related biodiversity are taken.

Advice on condition 5

The river corridor masterplan should include an indicative timetable for the river works. Feasibility studies for the removal of the river structures should be undertaken and assessed. If either structure listed in part (a) above is not found to be viable then wider mitigation works must be considered. The detailed scheme should ensure that the river corridor masterplan is still valid and that compliance with the objectives of the Thames RBMP is achieved.

Section 106

The only way this development will be fully WFD compliant is to carry out off site works that will enable WFD outcomes to be maximised on site. We know that the River Colne is a priority for Watford Council and we strongly recommend that you request a section 106 contribution from the applicant towards these off site works. This would enable the developer to implement the most sustainable outcome for the river for the lifetime of the development. It is important to ensure that WFD objectives are met so that river ecosystems are as robust and resilient as possible to future impacts including climate change. This ensures that they continue to be healthy and attractive green infrastructure networks for people and wildlife.

The supplementary letter received on 6 May describes that removal of the weir would result in an increased flood risk to the Croxley Rail Link. Not removing the weir however will prevent the River Colne from reaching good ecological status. This is unacceptable in relation to WFD objectives which require good status to be achieved by 2027. It is the responsibility of the applicant and the local authority to ensure that WFD requirements are met.

The removal of the weir is intrinsically linked with the main channel sluice slightly downstream and outside the red line boundary of the development. This sluice is in hydraulic connectivity with the weir and side channel sluice, and therefore they must all be considered together. The main channel sluice is currently impounding water upstream towards the weir. If removing this sluice would sufficiently reduce flood risk so as to allow for removal of the weir, then it should be taken out to allow WFD benefits to be achieved on site.

Reasons for failure for the River Colne include physical modifications to the river channel and barriers to fish passage. 'Fish easement' has been identified as a specific action for each of the three structures to enable the River Colne to return to good ecological status. Removal of these structures would complete these actions and improve the overall resilience of the river. These actions are expected to be delivered by 2027. If they are not incorporated into this project you will need to consider how you will deliver them within this timeframe.

It is reasonable therefore to request these off site works to remove the main channel sluice and to enter into a section 106 agreement with the applicant in order to do so. We believe that the feasibility study and implementation works required would cost in the region of £90,000 – £100,000 based on our colleagues' previous experience. This figure may vary depending on the applicant's consultancy fees and contractor arrangements.

Ground Conditions

Condition 6

Prior to each phase of development approved by this planning permission no development (or such other date or stage in development as may be agreed in writing with the Local Planning Authority) shall take place until a scheme that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

1. A preliminary risk assessment which has identified:
 - a. all previous uses
 - b. potential contaminants associated with those uses
 - c. a conceptual model of the site indicating sources, pathways and receptors
 - d. potentially unacceptable risks arising from contamination at the site.

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

3. The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

Advice on condition 6

The applicant must update the submitted reports to reflect the discussions of recent meetings. Each report must be tailored to that particular phase of development and any site investigation must follow relevant British Standards and references with these documents.

Condition 7

If, during development, contamination not previously identified is found to be present at the site then no further development of that phase (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a

remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Condition 8

No occupation of each phase of development shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Condition 9

No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Condition 10

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Local and national context for conditions 6-10

These conditions are supported by your local plan policy SE24 regarding unstable and contaminated land. Paragraph 109 of the NPPF states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being

adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).

The groundwater beneath and River Colne adjacent to the site is very sensitive to pollution. The groundwater is part of the Mid-Chilterns Chalk WFD groundwater body which is currently of poor chemical status. The site lies within Source Protection Zones (SPZ) 1 and 3, and in a drinking water protected area (DWPA). Groundwater from the principal chalk aquifer beneath the site is abstracted nearby for public water supply. The area encompassed by a SPZ in chalk is much greater than in other aquifers because groundwater flows fast in the chalk through cracks and fissures. Groundwater is likely to be shallow and in hydraulic continuity with the local rivers.

Advice

Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation.

Sport England

Comments made as a statutory consultee

It is understood that the site forms part of, or constitutes a playing field as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2010 (Statutory Instrument 2010 No. 2184), in that it is on land that has been used as a playing field within the last five years, and the field encompasses at least one playing pitch of 0.2 ha or more, or that it is on land that is allocated for the use as a playing field in a development plan or in proposals for such a plan or its alteration or replacement.

Sport England has therefore considered this application in the light of its playing fields policy. The aim of this policy is to ensure that there is an adequate supply of quality pitches to satisfy the current and estimated future demand for pitch sports within the area.

The policy seeks to protect all parts of the playing field from development and not just those which, for the time being, are laid out as pitches. The policy states that:

“Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field or allocated for use as a playing field in an adopted or draft deposit local plan, unless, in the judgement of Sport England, one of the specific circumstances applies.”

Reason: Development which would lead to the loss of all or part of a playing field, or which would prejudice its use, should not normally be permitted because it would permanently reduce the opportunities for participation in sporting activities. Government planning policy and the policies of Sport England have recognised the importance of such activities to the social and economic well-being of the country.

The planning application is a hybrid application for the Watford Health Campus project. This follows the original 2007 outline planning application for the Watford Health Campus development (permitted in 2010) which established the principle of the development. Due to changing circumstances, a revised scheme is being progressed and therefore the current application would supersede the 2007 scheme if permitted. Sport England was consulted as a statutory consultee on the original outline planning application for the Watford Health Campus scheme in 2007 which involved providing a new link road that would be sited on part of Wiggshall Road Recreation Ground (also known as Oxhey Park). Following discussions with the applicant and Watford Borough Council, a playing field mitigation package was agreed which was subsequently incorporated into the section 106 agreement associated with the 2010 planning permission.

The current application differs from the 2007 planning application in terms of the impact on the playing field due to a revised alignment of the link road through the recreation ground. Instead of running through the centre of the playing fields (as proposed in the 2007 application) the link road would run along the northern edge of the playing fields. This

would reduce the amount of severance and encroachment and allow more useable open space to be retained compared to the previous scheme. However, the remaining open space is now proposed to be used as an informal recreation area rather than for sports pitches. While the extent of the encroachment onto the playing field would be reduced compared to the previous scheme, it has been accepted that it would not be possible to retain the existing gaelic football and (association) football pitches or the existing tennis courts. Consequently, the impact of the current scheme on the formal sports use of Wiggenhall Road Recreation Ground as a playing field would effectively be the same as the 2007 scheme as the proposals would displace all of the existing pitches and courts.

Prior to the submission of the current planning application, a full application (Ref: 13/00971/FULM) for the Highway Infrastructure Works was submitted and approved. As these works had a direct impact on the playing fields it was considered appropriate to address playing field mitigation through this application rather than the current hybrid application for the wider scheme. Following discussions with the Council, the impact on the playing field was satisfactorily addressed through a package of off-site mitigation measures which was similar but not identical to the package agreed for the 2007 planning application. Planning conditions 22-26 of the planning permission for the Highways Infrastructure Works application address the requirements for playing field mitigation. As a satisfactory mitigation package has now been agreed through the aforementioned planning permission which has to be implemented in advance of the wider Watford Health Campus development it is not considered necessary for playing field mitigation to be secured through the current hybrid planning application.

I can therefore advise that Sport England does not wish to raise an objection to this planning application as a statutory consultee because the proposals are considered to accord with exception E4 of the above policy as set out in detail in our responses dated 24 October 2013 and 19 November 2013 to the previous planning application.

Comments made as a non-statutory consultee

The outline element of the planning application involves a residential development of up to 681 new dwellings. Sport England has assessed the proposals against objective 3 of its Planning for Sport Aims and Objectives Guide (2013) www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/ which seeks to ensure that communities have access to sufficient, high quality sports facilities that are fit for purpose. Using evidence and advocacy, we help to guide investment into new facilities and the expansion of existing ones to meet new demands that cannot be met by existing provision. The occupiers of any new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should be required to contribute towards meeting the demand they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facility Strategy, Playing Pitch Strategy or other relevant needs assessment.

In this context, I would wish to make the following comments on sports facility provision associated with the developments, in order to ensure that the additional facility needs that are generated by the developments are fully considered and provided for before any outline planning permissions are granted.

Sports Facility Provision to meet the needs of the Residential Development

A residential development of up to 681 dwellings will generate its own needs for sports facilities in Watford, which, if not met by the development, will place additional pressures on existing facilities. As such, I would expect the development to make adequate provision for meeting these needs. In terms of the evidence base, the Watford Sports Facility Strategy (2012) identifies deficiencies in sports facility provision throughout Watford and in summary has a strategy for the consolidation and improvement of sports facilities to create strategic playing pitch sites which would meet the current and future needs of the community.

The planning policy context for justifying the principle of sports facility provision is provided by Policy GI4 (Sport and Recreation) of the adopted Core Strategy which confirms that the sports facility strategy and its evidence base will be used for informing decisions for development proposals concerning sports facilities. In addition, saved policy L8 of the Watford District Local Plan which relates to open space provision in new housing development requires 2.8 hectares of open space provision per 1000 population to be provided. As set out in paragraph 4.58 of the submitted planning statement, applying the Council's standard to the development generates a requirement for 1.8 ha of outdoor sports provision.

As confirmed in the planning statement, no provision is made within the Watford Health Campus masterplan for formal outdoor sports provision. While there are no proposals for making on-site sports facility provision, 5.98 ha of on-site public open space provision is proposed in the master plan in the form of amenity green space, shared surfaces/squares and children's play areas. However, these are not intended for or suitable for outdoor sport.

Reference is made in the Planning Statement to 2.5 hectares of off-site outdoor sports facility provision being made for meeting the needs of the development. This would appear to relate to the off-site playing field mitigation package that has been proposed on various recreation grounds in Watford for compensating for the loss of the sports pitches and tennis courts on the Wiggshall Road Recreation Ground (Oxhey Park).

Sport England is concerned about the approach that appears to have been taken to meeting the additional outdoor sports facility needs generated by the development. The proposals for improving off-site existing recreation grounds were only intended to mitigate the impact on "existing" sports facilities which meet the "existing" needs of the "existing" community. They were not intended to meet the additional facility needs generated by the "future" population of the residential development which as set out above is significant in scale. The mitigation proposals involve broadly like for like replacement facilities to

provide continuity of facility provision for existing users and the need to replace the facilities has only arisen because of the impact of the link road. If the link road had not impacted on the playing field the off-site mitigation proposals would not have been necessary and therefore there would not have been any off-site outdoor sports facility proposals. In our view the off-site mitigation proposals do not offer the additionality that would be required to meet the significant additional needs generated by the new development.

Consequently, Sport England would not consider that the off-site replacement outdoor sports facilities would represent acceptable provision for meeting the needs of the proposed development and would not give this provision any weight. An objection is therefore made to the planning application on the basis of inadequate community sports facility provision being made for meeting the additional needs generated by the development. As well as being contrary to Sport England's policy objective, the proposal is not considered to accord with paragraph 70 of the NPPF or Policy GI4 of the Core Strategy and saved Policy L8 of the local plan.

To address this objection it is requested that an appropriate financial contribution is secured through a planning obligation (assuming the emerging CIL is not adopted when the application is determined) which would be used towards the implementation of the sports hub proposals in Council's Sports Facility Strategy. This approach would accord with the Sports Facility Strategy (and therefore policy GI4) which focuses investment on consolidating and enhancing strategic playing field sites in Watford and would be appropriate in view of the limited space available within the Watford Health Campus masterplan area for providing viable outdoor sports facility provision. I would be willing to withdraw this objection if it is confirmed that an appropriate financial contribution towards the provision or enhancement of off-site outdoor sports facilities will be made in practice.

Hertfordshire County Council (Waste and Minerals)

Should the Borough Council be mindful of permitting this application, a number of detailed matters should be given careful consideration. The County Council seeks to promote the

sustainable management of waste in the county and encourages Districts and Boroughs to have regard to the potential for minimising waste generated by development. The Department for Communities and Local Government highlights the need for Local Planning Authorities 'to help to contribute to delivering the waste hierarchy' in the *Guidance for Local Planning Authorities on implementing planning requirements of the European Union Waste Framework Directive (2008/98/EC)*.

This includes encouraging re-use of unavoidable waste where possible and the use of recycled materials where appropriate to the construction. In particular you are referred to the following policies of the adopted Hertfordshire County Council Waste Core Strategy and Development Management Policies Development Plan Document 2012 which forms part of the Development Plan for the purposes of section 54A of the Town and Country Planning Act 1990 (as amended). The policies that relate to this proposal are set out below:

Policy 1: Strategy for the Provision for Waste Management Facilities;

Policy 1a: Presumption in Favour of Sustainable Development;

Policy 2: Waste Prevention and Reduction: &

Policy 12: Sustainable Design, Construction and Demolition.

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

Waste Policy 12: Sustainable Design, Construction and Demolition requires all relevant construction projects to be supported by a Site Waste Management Plan. This aims to reduce the amount of waste produced on site and should contain information including types of waste removed from the site and where that waste is being taken to.

It should be noted that the application boundary contains a Metal Recycling Facility at Cardiff Road (unit 16), which is operated by Metal Recycling Ltd, and a District Council Depot and Waste Transfer Station at Wiggshall Road. Temporary planning permission also exists for a concrete crusher at Wiggshall Goods Yard. All of these waste management facilities are safeguarded under Waste Core Strategy Policy 5: Safeguarding of Sites.

This policy protects known operational and permitted sites in the county from other types of development, unless it can be demonstrated that alternative or enhanced provision is made, or where such a facility can no longer be justified. Whilst the “business area south” which is subject to detailed consideration in this planning application does not affect any of these waste management facilities (other than the temporarily permitted, but not yet implemented concrete crusher at Wiggshall Goods Yard), the County Council would expect subsequent detailed planning applications for the remainder of this site to have regard to these current facilities, in line with the wording in Waste Core Strategy Policy 5.

Hertfordshire County Council (Lead Local Flood Authority (LLFA))

One of our duties under Schedule 3 of the Flood and Water Management Act 2010 is yet to be commenced. Once it is commenced we will be responsible for implementing a Sustainable Drainage Approval Body (SAB). This body will be required to assess, approve and adopt any drainage system for any new development and the developer will be required to gain consent from the SAB before commencement of any works on site, separate to any planning permissions required.

Should a developer submit a Outline planning application before commencement of the SAB but any associated reserved matters are likely to be submitted 1 year after the date of commencement of the SAB, will be required to apply for a SAB Approval. At the moment there is an informal assumption that the SAB will be commenced in October 2014.

As the SAB legislation has not yet been commenced our comments on surface water management for this planning application below are advisory only and are not exhaustive;

General comments

Whilst we recognise that the developer is trying to provide Greenfield run-off rates from a predominantly brown field site, the FRA has not demonstrated the following:

- Management Train Approach with SuDS i.e. a piped system going to a single SuDS feature prior to discharge
- Treatment Train Approach with SuDS i.e. draining a large car park to a storage tank then direct to the River Colne does not provide any treatment of the water which is likely to contain diffuse pollution and hydrocarbons.
- Residual risk – it is stated there will be 3 new surface water outfalls from the site, however it has not been discussed as to whether these outfalls may become blocked when river levels are high and whether there is any risk of water backing up the system
- Locating SuDS in the floodplain- it is proposed to have attenuation features located in the floodplain. These systems need to be able to function at all times. Flood Water may also place these features at risk from structural failure. There is also a risk that flood water could contaminate the water within the SuDS ponds which at this stage should be clean as part of the SuDS system.
- Assessment of surface water flooding within the site, how this will be managed along with the surface water management of the development
- Management of exceedance routes within the site to ensure if the drainage system can not cope for anything over and above its design can be safely managed within the site.
- The use of on surface SuDS in place of piped network- has the developer explored the use of shallow lined systems to convey water from one part of the site to the other? This will allow a better interaction with water, allow those in charge of maintenance to trace any pollutants, provide better amenity and biodiversity space and improvement of water quality.

Section 23 of the Land Drainage Act 1991

As the LLFA we also have a duty to consent any works affecting an Ordinary Watercourse under the above legislation.

The FRA refers to works to de-culverting of an Ordinary watercourse but has not referenced the requirement to obtain consent from the LLFA before any works can be undertaken. The FRA should be amended to include this information.

We are aware that the applicant is in contact with us on this matter, but feel it is important for anyone reviewing the FRA or any supporting information for this development to clarify and identify the responsible authorities, particularly where these works are important for the development to commence as the FRA states these works will reduce flood risk to the site. This approval is required separate to any planning permission granted.

It can not be assumed however that the risk to the site will be lower prior to any works being agreed, consented and undertaken.

Hertfordshire County Council (Highway Authority)

The County Council as local highway authority has given a very detailed response to the Transport Assessment accompanying the application and has raised no objections to the proposal, subject to the imposition of the following 6 conditions on any grant of permission:

1. Construction of the development hereby permitted shall not be commenced until detailed plans of internal layout and car parking areas are submitted and approved by the Local Planning Authority.
2. The construction of the development hereby approved shall not commence until details of construction vehicle movements and construction access arrangements are submitted as part of the Construction Management Plan to and approved by the Highway Authority.

3. From first occupation to through out the lifetime of the development the applicant shall adopt necessary measures to comply with the approved Framework Travel Plan. An annual monitoring report shall be provided.
4. Prior to commencement of construction of the development hereby permitted, details of all materials to be used for hard surfaced areas within the site, including roads, driveways and car parking areas, shall be submitted to and approved in writing by the Local Planning Authority.
5. Before commencement of site works, the method of washing of vehicle wheels exiting the site shall be agreed in writing as part of the Construction Management Plan with the planning authority and the agreed method shall be operated at all times during the period of site works.
6. All areas for parking and storage and delivery of materials associated with the construction of this development shall be provided as part of the Construction Management Plan within the site on land which is not public highway and the use of such areas must not interfere with the use of the public highway.

Some of the detailed comments made in the response are summarised below.

The submitted Transport Assessment report covers both the masterplan and the Farm Terrace Allotments site within it. Chapter 3 'Baseline conditions' provides an accurate summary of the local highway and transport networks including its collision characteristics over the last 5 years as well as the accessibility of the site for those travelling on foot, by bicycle and by bus and train.

Trip generation and distribution

The details of expected trip movements to the site presented in the Transport Assessment (TA) report were derived using the same methodology as the Consented Scheme

assessment but using updated data sources where possible. New data sources included traffic surveys undertaken in 2013, updated with trip rates from the industry-standard TRICS 2013 survey data, and 2013 hospital staff postcode data. Consideration of the WHC masterplan excluding land associated with Farm Terrace Allotments is included as a sensitivity test in chapter 11 of the TA report.

An important finding of the comparison with the Consented Scheme is that the proposed HMA scheme represents a reduction of 107 two-way vehicular trips in the morning peak, and a reduction of 184 two-way vehicular trips in the evening peak compared to the Consented Scheme.

A significant change since the Consented Scheme was submitted is that the Croxley Rail Link Transport & Works Act Order has been made. The scheme is due to open in 2017 and will have significant benefits to sustainable (non-car access) accessibility in southwest Watford. Its effect on trips to and from the Health Campus site has been assessed as recorded in chapter 5 of the TA. This predicts a maximum 'benefit' associated with the rail link of 5.3% for car-based staff trips. Although the methodology employed is rational the results are higher than those claimed for the CRL scheme which predicted a total of 50 for the Rickmansworth Road corridor as a whole whereas the submitted TA claims more than that for this one development. However for the purposes of the assessment no CRL related adjustment was applied to the non-hospital mode shares in order to provide a robust approach to the vehicular trip generation of the site. Because this and other elements of the analysis are conservative I am confident that the overall effect is still that the mitigation measures proposed as part of the master plan would combine with the permitted highway infrastructure to have an acceptable overall effect on highway and transport infrastructure and services.

Impact on Highway Network

The numbers of trips likely to be generated are discussed in chapter 6 'Distribution and Assignment' of the Transport Assessment. This demonstrates that the total vehicular trip generation of the HMA scheme (including future development on land associated with

Farm Terrace Allotments and future hospital) is lower than the Consented Scheme with 109 fewer two-way trips in the morning peak and 185 fewer two-way trips in the evening peak. The effects on traffic of the proposed expansion at the primary school is analysed separately. Not surprisingly it is likely to increase the turning movements at the Willow Lane signalised junction and lead to a minor change in traffic flows between the existing and proposed school egress. However, there will be no further impact on the wider network.

The likely effects of these changes in movement patterns are covered in chapter 8 'Impacts - Highway Network Assessment year 2023' of the Transport Assessment.

The junction assessments for the future 2023 with full development indicate that the local junctions would generally operate with an improved level of performance compared to the Consented Scheme.

Highway Layout

Chapter 10 of the submitted TA 'Consideration of Need for Mitigation' considers the effects of the traffic generated by the revised master plan on the following off-site transport related mitigation measures from the Consented scheme:

(i) Lower High Street / Dalton Way Junction Improvements & Lower High Street/ Bushey Arches

(ii) Wiggshall Road / Cardiff Road signal optimisation

(iii) Traffic signal controller upgrading to improve junction efficiency and control at the M1 Junction 5 interchange with A41 and A4008

i) Lower High Street/ Dalton Way junction

Operation of the signals at this junction which has long been of concern to local residents and councillors was analysed and a video survey taken to assess pedestrian use. The facilities on site have been upgraded since the Consented Scheme was designed since

HCC has installed a shared use cycle lane along the west side of Lower High Street. Numbers of HGVs turning into Dalton Way were also counted.

The video survey showed that not all pedestrians call the pedestrian phase to use the crossing but a high proportion of those who do are school children or parents/guardians with push chairs. This pedestrian crossing phase therefore does not have a significant impact on traffic capacity but provides a safe controlled facility for vulnerable road users and therefore there is a significant benefit in seeking to maintain this facility.

The Consented Scheme improvement proposals included re-marking of the Lower High Street approach to Bushey Arches to provide an extended length of two-lane approach. The baseline situation has however changed along this section of Lower High Street with a signal controlled pedestrian crossing having been installed in place of a previous zebra crossing. The widening of the approach through the signal controlled junction would lead to increased length of pedestrian phase which in itself would reduce vehicle capacity and significantly reduce any potential capacity benefits of widening to two lanes. Given that any increase in junction capacity gained by widening the approach would be offset by the additional delay caused by widening the signalised pedestrian crossing, widening of this section is not as part of the application scheme. There are also no development trips assigned to the Lower High Street southbound movement approaching Bushey Arches in either the morning or evening peaks.

In order to seek to address some of the issues identified above, related to the illustrative consented scheme, a number of refinements have been developed and these are shown in Drawing 60288684_TR_Dalton Way Signals_002:

- 1) Two narrowed right turning lanes (2.5m) would be provided specifically designed to accommodate two large cars to turn side by side but requiring large heavy goods vehicles to take up more than one approach lane which would prevent two lanes of heavy goods vehicles forming at the signals. This is considered a safety benefit and appropriate given the unlikelihood of two max legal vehicles attempting to turn right side by side, as

evidenced by the traffic counts. This is also considered appropriate given the fact that two max legal articulated vehicles turning side by side are likely to clash unless significant additional widening is undertaken and this completely compromises the central refuge at this junction and any potential ability to potentially accommodate pedestrian/ cycle crossing facilities.

2) The narrowed lanes enable provision of a wider footway on the western side of the Lower High Street (North)

3) A bigger central refuge is proposed at this junction which could accommodate pedestrians

ii) Wiggenhall Road/ Cardiff Road junction

The Consented Scheme planning consent involved some intensification of the use of Cardiff Road compared to the baseline industrial estate situation and a condition was included in the Consented Scheme relating to signal optimisation of the Wiggenhall Road / Cardiff Road signal controlled junction. The new masterplan includes residential extension of Cardiff Road but the traffic generation would be below the industrial estate baseline permitted case. In addition the Cardiff Road / Wiggenhall Road signal controlled junction has been subject to upgrading and optimisation as part of a local safety scheme since the granting of the Consented Scheme. Therefore it is not considered that any mitigation is required at this junction.

iii) M1 junction 5

The TA report indicated that whilst the WHC HMA scheme proposals including development on land associated with Farm Terrace Allotments would result in fewer trips than the previous consented scheme, there will still be a requirement for improvement of the signal operation at M1J5, in the form of the introduction of MOVA control at the junction. This has been discussed and agreed with the Highways Agency. The timing of the mitigation requirement has been discussed with the Highways Agency and it was agreed that a land use floor area limit that results in 30 two-way development trips in an

hour through the M1J5 would be a suitable threshold to consider as a trigger for the mitigation.

Travel Plans

A Framework Travel Plan was submitted as part of this application. This appears to follow the transport consultant's standard format but adequately summarises local and national guidance and policy framework. It gives a suitable summary of local sustainable transport links including the planned Croxley Rail Link. The section 'Management & Implementation' describes a robust regime for operation and monitoring of the Plan supported by an acceptable range of incentives in the section 'Measures & Initiatives'. The highway authority finds acceptable the proposed measures set out in the section 'Targets, Monitoring & Review & Action Plan'.

Planning Obligations/Community Infrastructure Levy (CIL)

It is Hertfordshire County Council's policy, approved by cabinet in January 2008, to seek a planning obligation in respect of Sustainable Transport including, but not limited to, highway and rights of way improvement for all developments. The NPPF promotes accessibility by sustainable means including bus, cycling and walking, and the provisions of S.106 of the Town and Country Planning Act allow that planning obligations may be used to mitigate the impact of development. The Community Infrastructure Levy (CIL) Regulations 2010 states that Local Authorities still have the ability to collect pooled contributions through S.106 until they have adopted CIL.

Planning obligations were negotiated as part of the earlier permission applying to this site. It is the wish of the highway authority that those set out in Schedule 2 of that agreement should still apply to the master plan development following a review of payment trigger points to be carried out in conjunction with the applicant and local planning authority. This matter does not appear to be discussed in any detail in any of the documents submitted as part of the current application other than the matter of the funding of improvements to the control of the traffic lights at M1 junction 5.

Hertfordshire County Council (Planning Archaeologist)

No comments have been received. However, the comments received in relation to the previous application for highways and infrastructure works are equally applicable in this case and relate to the imposition of the standards archaeological conditions:

“The Historic Environment Record notes that the Colne Valley has potential for human occupation/use from the prehistoric period. The proposed development is therefore likely to have an impact on heritage assets, and I recommend that the following three archaeological conditions be attached, should you be minded to grant consent:

- A. No demolition/development shall take place/commence until an Archaeological Written Scheme of Investigation has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of archaeological significance and research questions; and:
1. the programme and methodology of site investigation and recording;
 2. the programme and methodology of site investigation and recording as suggested by the archaeological evaluation;
 3. the programme for post investigation assessment;
 4. provision to be made for analysis of the site investigation and recording;
 5. provision to be made for publication and dissemination of the analysis and records of the site investigation;
 6. provision to be made for archive deposition of the analysis and records of the site investigation;
 7. nomination of a competent person or persons/organisation to undertake the works set out within the Archaeological Written Scheme of Investigation.
- B. The demolition/development shall take place/commence in accordance with the programme of archaeological works set out in the Written Scheme of Investigation approved under condition A.

- C. The development shall not be occupied/used until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition A and the provision made for analysis and publication where appropriate.

I believe that these recommendations are both reasonable and necessary to provide properly for the likely archaeological implications of this development proposal. I further believe that these recommendations closely follow the policies included within Policy 12 (para. 141, etc.) of the National Planning Policy Framework.”

Hertfordshire County Council (Development Services)

It is widely recognised that new development may impact on infrastructure and services and that planning obligations should be secured to offset those impacts. Hertfordshire County Council (HCC) may seek provision of facilities or financial contributions on residential developments in respect of education, childcare, youth, library and fire and rescue services. Adult care special needs provision (for older people, and those with learning and physical disabilities and mental health needs) may be required particularly on larger developments in addition, waste matters are also considered where required. Highways and transportation matters along with green infrastructure are dealt with separately by the Highway Authority and Environment Department.

In order to assess the impact of the developments being proposed at Watford Health campus both applications have been considered as one development given their locations and timing.

HCC Services

1) Education

As mentioned above, education requirements are assessed using a HCC developed census-based model which forecasts the number of children likely to emerge from a particular development based on trajectory information and, where available, illustrative

mixes. This model was developed in house and has been tested at appeal in relation to the proposed “West of Stevenage” development.

It has been assumed that the development will supply dwellings over an eight year period (2016-2023) as set out in the Planning Supporting Statement for the farm terrace allotment site (Para 3.101).

i) Primary Education

Based on the information seen to date, we estimate this proposal (comprising a total 750 dwellings) would result in the need for up to 1.43 Forms of Entry (FE) at nursery/primary level.

HCC is aware of an earlier application made in 2007 (decision 2010) for the redevelopment of the WHC site and subsequent negotiations on the S.106 legal agreement which would have resulted in contributions made in line with the Toolkit, if implemented. However since that date, the demand for school places has increased significantly and is now under severe pressure in Watford. HCC has worked on education strategies to deal with existing and future demand requirements and embarked upon a substantial primary expansion programme in the town and elsewhere in Hertfordshire, to respond to this challenge.

In the last few years, discussions have taken place between HCC and WBC on the subject of primary education provision at the WHC site which may be summarised as follows and which are set out in more detail at Appendix 1 and the Education statement at Appendix 2:-

- HCC's preferred stance on education strategy in Watford including the need for a 2FE primary school to be provided on the WHC site to provide for the development as well as wider education needs, as set out in HCC's representations to date on the Local Development Framework.

- Concerns raised by WBC on the difficulties in delivering a primary school at the WHC site
- Alternative options explored for provision of primary provision
- Consideration in some detail of the potential of the adjacent Laurance Haines Primary school to expand

HCCs current position is as follows:-

Laurance Haines school site may be capable of expansion, although it should be noted that that the WBC commissioned TP Bennett study which arrived at the conclusion that a 1FE expansion was feasible was a desktop study, which was not underpinned by the range of feasibility reports and studies which would be required to assess risk fully.

Discussions regarding expansion proposals have yet to take place with the school and nursery.

The school, if expanded, may require additional land so that it can function effectively, including provision of adequate playing fields, external space and nursery facilities. From initial exploration, two parcels of land may be required, one from within the WHC site which lies adjacent and another opposite the site at Harwood Recreation Ground on Vicarage Road. If found to be required, this land would need to be transferred by S.106 deed.

HCC recently commissioned Mace architects to undertake a cost exercise on the TP Bennett work and this indicates that a 1FE expansion could cost between £3.5 -5m. HCC considers this to be on the high side but also notes that this site is quite constrained. On this basis it is considered that further feasibility work should be undertaken to set out whether expansion of the school is a cost effective and valid option. The work should include at the very least, basic design, highways, flood risk, tree, ecology and topographical assessments. HCC is currently commissioning this work.

An initial assessment of the development of 750 dwellings using HCCs Planning Obligations Toolkit methodology based on an indicated mix, would offer just less than £1m if primary and nursery education contributions are combined. Use of this method is unlikely to be appropriate for use here now, given the above updated information.

Moreover, work done to date only relates to a 1FE expansion and does not cater for the whole demand arising from the development. Further consideration needs to be given to delivering a solution for the remaining 0.43FE need. The sequence of events set out here now results in the need for HCC to review its primary education strategy for Watford as a whole. Although these issues are currently being considered it is not possible to offer a solution at this moment in time.

ii) Secondary Education

Based on the information to date, we estimate this proposal (comprising a total 750 dwellings) would result in the need for up to 1.35 Forms of Entry (FE) at secondary level.

Secondary education provision for future development in Watford will be dealt with as part of a wider area covering Watford, Rickmansworth and Bushey education planning areas. The strategy was outlined in HCCs representations to the Core Strategy Pre-Submission Significant Changes Dec 2011 as follows:-

2.47 There is a need for a new 6 to 8 FE secondary school in South west Hertfordshire arising from existing population. This has been calculated by ageing on the existing primary population. Two potential sites are being promoted through the Three Rivers District Council LDF for this purpose.

HCC has taken two secondary school sites (at Mill End and Croxley Green) through the TRDC LDF site allocations town planning process and is anticipating adoption of them this summer.

Toolkit linked contributions from a large number of developments in Watford, as well as Rickmansworth and Bushey, are being pooled to help provide school places. Moreover, if available, future Community Infrastructure Levy monies will also be sought to assist in funding this provision.

iii) Early Years Provision and Nursery Education

Early Education facilities will be required for 3 and 4 year olds on the school sites required as a result of this development. Nursery facilities are usually provided on primary school sites and align with primary education needs (as above).

Section 6 of the Childcare Act 2006 places a duty on all local authorities to secure sufficient childcare for working parents or parent who are studying or training for employment for children aged 0-14 (19 for disabled children). The county council also has a statutory responsibility to provide universal Free Early Education (FEE) for 3 and 4 year olds. From September 2013 the county council has a statutory responsibility to provide 15hrs free early education (FEE) to eligible vulnerable 2 year old children across Hertfordshire. Consequently demand for these services is forecast to increase, in addition to the increasing population of young children in the county. Provision for these services may be within schools preschools and day nurseries and childminders.

In addition to free early education places, the county council also has a duty to ensure there are sufficient childcare places for 0 -14 years children (19 for children with S.E.N.D.) in Pre Schools, Day Nurseries and Out of School clubs which can run either from school locations or other community facilities.

The local authority has a duty to deliver Children's Centres in every community, each providing for 800 children (0-5 years). These will provide 'one-stop shop' integrated facilities (e.g. childcare, early years, health and parenting services) for parents and children of 0-14 year olds.

For the local authority to meet these duties and taking into account the size of the development the demand for these services would increase significantly.

The minimum requirement would be for a community facility based on the school site which will house a co located children's centre outreach facility and childcare premises (approx 250 sq metres). This minimum requirement is in addition to the new primary school offering a nursery class provision. If this is not achievable on the school site this should be located on another location within the development.

2) Youth Provision

New residential development will result in additional pressure on to the youth service. A financial contribution is therefore sought towards youth facilities as set out in the Toolkit. (As the application is in outline and the mix of units is not known, a single contribution figure cannot be calculated at this stage.) The contribution would be used to enhance the facilities in the main town centre to enable them to cope with the additional demand and to work with local community groups and agencies in the proposed new communities. These are based for the benefit of all young people in Watford at YouthPoint in Lower High Street but, in addition, Youth Projects are also offered at various locations in many areas of the borough using community centres and other venues. Financial contributions are used to enhance these facilities and services.

3) Library Provision

New residential development will result in additional pressure on to the library service. A financial contribution is therefore sought towards library facilities as set out in the Toolkit. (As the application is in outline and the mix of units is not known, a single contribution figure cannot be calculated at this stage.) The contribution would be used to enhance the library facilities in the main town centre to enable them to cope with the additional demand and to work with local community groups and agencies in the proposed new communities to promote library services.

4) The Fire and Rescue Service

The Fire and Rescue Service would urge and encourage the installation of residential sprinkler systems to reduce the impact of this development on both the residents and the increase in calls that will come from a development of this size.

- Fire Hydrants

All dwellings must be adequately served by fire hydrants in the event of fire. The County Council as the Statutory Fire Authority has a duty to ensure fire fighting facilities are provided on new developments. HCC therefore seek the provision of hydrants by the developer, through standard clauses set out in a legal agreement. If the developer does not provide hydrants where necessary (and this is a matter which is not considered until a more detailed design stage), the responsibility and cost would fall upon the County Council. In addition, buildings fitted with fire mains must have a suitable hydrant provided and sited within 18m of the hard-standing facility provided for the fire service pumping appliance.

5) Adult Care/Special needs

No comments.

Conclusions

It is noted that the planning applications allude to the need for discussions around planning obligations including HCC service provision (Farm Terrace Planning statement para 4.136). It is therefore hoped that the above comments are useful and that further discussions may be held so that we can jointly flesh out the pertinent issues and work towards a satisfactory impact mitigation solution for the community of Watford. You will note that additional feasibility work is planned to be undertaken by HCC in the near future, in this regard.

Hertfordshire Ecology

The impact on ecological resources locally as a result of the Health Campus development will include:

1.1 An impact on the integrity and nature of the existing Wildlife Site Croxley Green Junction Sidings (84/045 HERC database). This is not recognised as an ecological constraint but is recognised as an effect within the Environmental Statement. The proposed SUDS will further impact upon the existing woodland and scrub present and may further compromise the reason why this site has been recognised as a Wildlife Site (open grassland communities), although the concrete crushing operation has already achieved much towards this. Even the remaining scrub / woodland has been encroached upon, although what remains is locally valuable within the nature of the river corridor.

SUDS is expected to enhance the site ecologically but this should not be at the expense of features already providing a SUDs role or existing habitat value, and further consideration of these proposals may be required.

Mitigation is proposed to extend the designation to a wider area with habitat creation along the river corridor, but this may not be possible if WS criteria are not met. These areas are also to be promoted for some leisure use - a potential conflict of objectives for such a small area. The proposals for tree planting and meadow creation conflict here and will also complicate management proposals. Little if any details of what will be created and subsequent management have been provided;

1.2 Loss of Cardiff Road Embankment (Ref 84/057) adjacent to the above. This area was formerly largely trees and scrub and will be cleared to accommodate the road infrastructure;

1.3 Loss of Willow Lane / Cardiff Lane former 'allotments' (84/059 HERC Ecology Site) – previously an area of established scrub / woodland. Although considered 'degraded' it is recognised there will be a loss of open space. The proposals state that *'The loss of public*

recreation space at Former Willow Lane Allotments will effectively be mitigated by the creation of new parkland and green circulation routes. These spaces will be designed to be of a higher amenity value and quality than the existing greenspace at Former Willow Lane Allotments and is considered to represent an important positive impact of the scheme'. However this claim lacks credibility given the significant disparity in extent of semi-natural greenspace and habitat involved. Loss of the resource cannot possibly be compensated for given the size and shapes of the proposed greenspace, however well designed and enhanced the landscaping is.

1.4 Although there will be no loss to the integrity of 'The [Croxley] Island' (Site Ref 84/058), the proposals for a local park will almost certainly impact upon the existing or potential ecological interest. The creation of a formally managed park and leisure facility for Public Open Space as part of a chain of improved and new spaces along the River Colne will create vegetation communities suitable for this purpose. It will also introduce additional disturbance not currently present and potentially create more of an artificial character in contrast with an otherwise 'wild' area at present.

Whilst 'informal wetland and meadows' are proposed, given this island is only around $\frac{3}{4}$ hectare, these seem rather ambitious in the context of all the other uses this site is expected to provide, despite the aim to enhance biodiversity and landscape value. Major strategic connections are also proposed to the Island from the north for amenity purposes; how this is supposed to work alongside the proposed wetland creation and river corridor enhancement here is unclear. However the additional housing in the area will understandably require leisure space.

1.5 Direct loss of species and associated habitats from the development area. Slow worms and grass snakes have already been translocated from Colne Island (over 500 slow worms and 2 grass snakes) and the western end of the site (132 slow worms and one grass snake). Other habitats were destructively searched. Whilst this follows best practice, I am concerned about the impact on any population already present on the Lairage land which received these reptiles – if already present the site was probably

already at its carrying capacity and no additional habitat management to enhance the potential for slow worms has been proposed as a result. Indeed, no information on whether the receptor site already supported slow worms was provided, so it would not be possible to assess whether this was successful. Consequently I do not accept this impact to be negligible.

If appropriate habitat is allowed to develop on Colne Island and elsewhere, slow worms may re-colonise but currently all of these individuals will have been lost from the areas affected.

1.6 It does not appear that Water voles, previously recorded from Oxhey Park River and margins, will be impacted by the proposals as they are not present.

1.7 Bats have been assessed through activity surveys and overall general bat activity is considered to be low. They have previously been recorded along the Colne at Riverside Road to the south of this site. However the bat activity following the development is likely to be even lower given the impact on open foraging areas and associated habitat features.

1.8 No other protected species are considered to be affected following surveys, which seems to be a reasonable reflection of the survey results.

1.9 Common breeding birds of urban areas are likely to present and presumably will be affected, although usual provisions to avoid nesting disturbance would apply.

In respect of the Health Campus complex as a whole, components of which are outlined above, the more significant direct and indirect ecological impacts can be summarised as follows:

- Loss of former allotments, Willow Lane
- Loss of Farm Terrace Allotments
- Impact of landscaping on Croxley rail sidings Wildlife Site

- Impact of landscaping on Colne Island
- Loss of locally significant reptile populations
- Increased disturbance to the remaining greenspace areas within the river corridor and Lairage LNR.

The positive aspects of the proposals should be considered in this context.

1. I recognise the biodiversity 'opportunity' in the D&A Statement presented as a corridor route associated with the River Colne, but of course this already exists and will be severely modified by the proposals. Consequently I can't see how this can be presented as a benefit associated with the development.

2. Most of the landscaping considerations and provisions relate to impacts of the proposals outside of the Farm Terrace allotments, although these are recognised as contributing to the strong natural and open space elements of the area. Whilst some of these may currently be considered to be degraded, I can't see how the loss of such greenspace within the river corridor environment can be beneficial to the townscape, other than by creating more built development, although I acknowledge this can be seen as urban regeneration. What seems to be recognised is that the proposed landscaping will provide valuable green infrastructure for the development – without fully recognising the resources to be lost or impacted are already valuable as green Infrastructure in their own right. Any existing 'degradation' is a function of their treatment rather than their intrinsic quality or contribution.

3. The ES states there will be an ecological management plan but I assume this has yet to be completed. Consequently it is not possible to assess this and any associated benefits in the context of compensation for the significant loss of greenspace within the development – including Farm Terrace. Whilst I support the habitat mitigation proposals, these will effectively only create landscaping features and GI within the development itself that I would expect to see as part of a quality development of this nature, which cannot replicate the extent and nature of the resources currently present and which will be lost,

however good the habitat enhancements of green roofs. It is also recognised in the ES that recreation will create additional disturbance and degradation of habitats and yet it is proposed to encourage use of new green spaces for recreation. This multi-use approach to GI is laudable if it were not for the significant loss of open space and pressure this will bring on what is left.

4. A considerable proportion of the new housing development is within the floodplain, according to Fig. 2 of the Landscape Strategy. For obvious reasons I am concerned regarding the implications of this and can only assume that this issue will be fully considered by the Environment Agency.

5. It is recognised that footpaths, low walls and SUDS features are proposed within the EA's 8m consent zone next to the river. I understand that SUDS are not supposed to impact upon areas or features already performing or contributing to a wetland SUDS function, so the pressure even on these areas is going to be high. Whilst in terms of reducing the current footprint of the built environment the result may be a wider 'River Colne corridor', it is essential that the nature of this is corridor is appropriate if this is to result in any ecological benefit.

6. The proposed open spaces of the mini park, and community garden are tiny in comparison with existing greenspace, whilst Colne Island and Riverside Park already exist and will be modified by the proposals anyway, partly to accommodate the increase in local use and disturbance that these areas will be subject to – and this may also include the Lairage LNR. Consequently I have no doubt that the area affected will be ecologically impoverished as a result, and that this will have a negative impact on the ecological resources generally within or adjacent to the river corridor within this area of Watford. This would appear to be an inevitable result of development needs which would outweigh the ecological interest currently present, and for which there would seem to be no fundamental ecological constraints.

7. On the basis of the habitat and species losses, compounded by leisure space requirements and the associated pressure this brings, I cannot accept that the development will result in a major biodiversity benefit to the area as claimed within the Design and Access Statement. In my opinion the conclusion that the majority of the adverse ecological impacts can be mitigated through implementation of the landscaping strategy and best practice measures to protect and enhance the remaining habitat cannot be substantiated. The impact of the development will clearly result in a considerable permanent loss of open greenspace with some ecological value, some of which is known to have supported reptiles which have now been removed. I do not consider this to have been mitigated or compensated for by landscaping proposals.

8. However I acknowledge that the approach in respect of protected species follows best practice and that high quality landscaping as part of GI is proposed, given the needs of the development and subsequent use of open space. There needs to be particular emphasis on management considerations of these spaces if biodiversity is to be enhanced.

In order to address the net loss of biodiversity and GI, I would wish to see:

- A detailed management plan for the proposed GI areas, covering all of the habitat areas and sites affected by the proposals. This should also include a mechanism to enable implementation.
- Proposals for replacement allotments and associated habitats elsewhere in the local area.
- Biodiversity Offsetting to secure enhanced management elsewhere within the river Colne corridor to strengthen the role this plays within Watford.

These should be considered as conditions or as S.106 Agreements as appropriate to ensure their provision and delivery.

Crime Prevention Design Advisor (Hertfordshire Constabulary)

The application is outline only and no doubt detailed designs and applications will be produced in due course and as a consequence my comments will be an indication of the level of designing out crime I would be considering for each defined development area.

The Hub

I note the new buildings will be to BREEAM standards and you will no doubt contact us as and when further designs are forthcoming.

Central, Cardiff Road, Willow Lane and Riverside

I note there will be new homes on this site and I would be looking for these to have doors and windows to PAS24-2012 and be accredited to Secured by Design. I would also be looking for all flats to have access control and communal doors to LPS1175 SR2 or STS202 BR2 standards. I note there is an agreement for these homes to be to Code 4 of the Code for Sustainable Homes and SBD can assist in providing a number of points to reach the appropriate level.

Any underground car park to have electronic shutters, and if part of a block of flats have secure access control to the flats, and be accredited to the British Parking Associations Park Mark scheme, similarly any other car parks to be accredited to the BPA Park Mark scheme.

Business Areas

An approach has been received from Ian C King with suggested designs and we commented to the architect, with a copy to you, on 24 February. I note some of the comments/recommendations have been implemented; however I still see what looks like a public footpath along the River Gade plus a bridge - something I wished to avoid as it will become an anti-social behaviour hot spot.

Could I again ask that there be no permeability on to or from this site as I do not wish to insist on a security fence along the River Gade elevation, a low level fence with planting would seem far more appropriate.

Environmental Health

Noise and vibration

Noise and vibration is considered in Chapter 13 of the Environmental Statement. The Environmental Health Section discussed the noise modelling methodology and scope of the report with the report's author beforehand.

Looking to the internal ambient noise level design range targets, set out in table 13.3, we would expect that the design range for the following use classes, C1 & C3 to achieve the good standard rather than the reasonable standard.

In table 13.9, we are uncertain that we can agree that an increase of 5dB(A) over existing background can be described as not a 'significant effect', especially as BS4142 advises that such an increase is of marginal significance. In order to protect the amenity of local noise sensitive premises we would normally seek to achieve a level of -10dB(A) for the difference between rating level and background level as calculated using BS4142. It does appear however that the intention is to achieve a level of -10dB(A) for the difference between rating level and background level as stated in para 13.7.2.1 and in table 13.20.

The noise level detailed in table 13.14 at monitoring location 6 appear quite high bearing in mind the location. Ideally we would like a subjective description of the dominant noise sources during the measurement period so a determination can be made as to the reasonableness of this level. Looking at all the data in tables 13.13 and 13.14 we are surprised that longer monitoring durations were not used.

Land contamination

Contaminated Land is considered in section 3.1 of the Environmental Statement Non-Technical Summary and Chapter 5 of the Environmental Statement. The proposed

investigation methodology in respect of the HIW and the wider scheme was agreed in principle at a meeting held between Environmental Health, AECOM and Development Management at the Council Offices on 30 May 2013.

Baseline conditions have been established by previous ground investigations undertaken across the whole site. Chapter 5 has been largely based upon the information contained within the following reports:

- Phase 1 and Phase 2 Geotechnical and Geo-environmental Desk Study report produced by AECOM dated July 2013 (AECOM, 2013a). This report includes a compilation and review of all available ground investigation data produced historically, including the most recent investigation undertaken by Ramboll in 2012.
- Factual Report on Ground Investigation produced by Geotechnical Engineering Limited (GEL, 2014). This report presents the factual records of the ground investigation undertaken in June and July 2013.
- Hydrogeological Baseline Report produced by AECOM dated December, 2013 (AECOM, 2013b). This report provides a baseline for groundwater quality within the Principal Chalk Aquifer.
- Outline Remediation Strategy produced by AECOM dated December 2013. (AECOM, 2013c). This report presents outline mitigation measures for the HIW; the principles discussed are applicable to the hybrid masterplan.

The first report (AECOM 2013a) has been submitted and reviewed in respect of Conditions 5 and 6 of planning permission 13/00971/FULM (14/00481/DISCON and 14/00482/DISCON), however, the Factual Report on Ground Investigation (GEL 2014) and Outline Remediation Strategy (AECOM 2013c) have not been submitted for review.

Risks relating to contamination may be mitigated through design and remediation.

It has been acknowledged that the current baseline ground conditions will benefit from some betterment as a result of the remedial works to be undertaken as part of the HIW.

It has been acknowledged in the AECOM 2013a report that numerous phases of intrusive investigation to suit the masterplan and individual plot development are anticipated and conceptual site models will be developed for each phase of the project, specific to the proposed end use (e.g. residential, commercial etc). This approach has been agreed.

In respect of Business Area South, an interpretative report is being written to quantify risks to the development using all available data from the zone. Further investigation is to be undertaken once the site has been vacated. Specific mitigation measures to deal with any land contamination will then form a detailed remediation strategy for the plot.

I would ask that the standard contamination condition be attached to planning permission 14/00511/OUTM & 14/00512/OUTM to ensure these works are undertaken and the issue of land contamination addressed. The Environment Agency should be consulted in respect of risk to controlled waters.

Air quality

Air Quality is considered in section 3.8 of the Environmental Statement Non-Technical Summary and Chapter 12 of the Environmental Statement. The Environmental Health Section agreed the air quality modelling methodology and scope of the report with the report's author beforehand.

Overall the report has used up to date monitoring data and the latest version of the Emission Factors Toolkit, and the modelled concentrations have been validated against monitoring undertaken by the council. The report also includes the council's current position with respect to the Air Quality Management Areas that have been declared in Watford and the Air Quality Action Plan that that is being developed to try and improve air quality in these areas.

We are satisfied with the way the report has been written and the methodology used, and have no reason to doubt the conclusions that the report draws.

Modelling has been used to predict concentrations at a number of sensitive receptors in and around the proposed development, and these have been used to compare baseline concentrations, a 'Do Minimum' scenario and a 'Do Something' scenario. Comparisons have also been made between the currently consented scheme and the outline application, both with and without the Farm Terrace Allotment development.

The report correctly identifies that the proposed development is close to two existing Air Quality Management Areas (the Vicarage Road / Hornets interchange and the Bushey Arches interchange).

Comparing baseline concentrations with those resulting from the proposed development, the report suggests that for nitrogen dioxide, a traffic related pollutant, the annual mean air quality objective will be exceeded at one of the 31 receptors. This receptor is at ground floor level close to 30 Vicarage Road where an annual mean of 40.3 $\mu\text{g}/\text{m}^3$ (microgrammes per cubic metre) has been predicted for the year that the scheme is due to open (2023). This compares to the annual mean objective concentration of 40.0 $\mu\text{g}/\text{m}^3$ and the current measured annual mean of 54.0 $\mu\text{g}/\text{m}^3$. The overall reduction prior to the scheme opening is expected to be as a result of reduced traffic emissions due to improved engine technology.

Modelling also suggests slight adverse effects at two other receptors on Vicarage Road but concentrations remain below the annual mean objective level.

There are only negligible differences in concentrations at all receptors when comparing the already consented scheme against this application, both with and without the Farm Terrace Allotment development.

Predictions of current and baseline PM10 particles (another traffic related pollutant) show negligible differences between baseline concentrations and those resulting from the

scheme, or between the already consented scheme and this application, both with and without the Farm Terrace Allotment Development.

Overall we do not believe there is sufficient evidence to object to this application on air quality grounds.

It is important that a dust management plan is in place to deal with dust emissions from the site.

Sustainability

Sustainability is duly considered as part of this planning application. The Sustainability Statement uses the recognised methods of assessment BREEAM, Code for Sustainable Homes and Part L. In addition the application acknowledges planning policies by Watford Borough Council (WBC) and Hertfordshire County Council, as well as guidelines from Watford Health Campus Sustainability Protocol and the Department of Health Sustainability Development Action Plan.

The Sustainability Statement states that the project will meet Part L 2010 as required by the WBC planning policy. Part L 2013 regulations have recently been published. Therefore a condition should be made that Part L 2013 regulations are met as a minimum for the design and construction of this project.

Additionally the Sustainability Statement that CO₂ emission reductions will be reported against a Part L 2010 baseline. These should be recalculated with the updated Part L 2013 regulations to ensure that CO₂ emission reductions are realised at the minimum of BREEAM Very Good, the level that is stated the Sustainability Statements targets.

At Best and Final Offer (BaFO) stage the Sustainability Implementation Plan [Appendix 8(c)] states the project will:

“Promote energy efficiency in design in commercial buildings that will result in a 25% reduction in carbon emissions (beyond a 2010 Building Regulations Part L compliant

development) in line with the BREEAM New Construction 2011 Excellent minimum standard. For residential buildings achieve at least a 25 % improvement of DER/TER measured using the AD L1A 2010 TER as the baseline.”

Conversely the Sustainability Statement states that

Development Section	Building Category	Annual CO2 Emissions Reductions
Masterplan	Dwellings	25%
Masterplan	Non dwellings	10%
Farm Terrace Allotment	Dwellings	25%
Farm Terrace Allotment	Non dwellings	4%
Business Area South	Non dwellings	28%
Entire Site	All	14%

The only non dwelling that aims to achieve the project target as set out in BaFO stage is the Business Area South. Conversely the masterplan – non dwelling aims to achieve 10%, and the Farm Terrace Allotment Non dwelling aims to achieve just 4%. Additionally the BaFO Sustainability Implementation Plan repeatedly states that BREEAM Excellent will be aimed for; however Section 3.2 of the Sustainability Strategy states the goal is BREEAM Very Good. Clarification is needed on these disparities. I am satisfied with the solution to reduce CO₂ emissions through the use of CHP, Solar PV and high efficiency gas boilers.

It is noted that the development will aim for 105 l/p/day water use in the new dwellings. As these are buildings it is assumed that water meters will be fitted to each residential building. Confirmation of this would be appreciated.

In addition to the above conditions I would ask that the Flood Risk Assessment’s surface water management solutions are added as conditions to the planning permission:

- Impermeable surfaces with some soft landscaping are implemented throughout the masterplan to reduce run-off rates.
 - SuDS such as balancing ponds, swales and permeable paving will be employed wherever possible to reduce the burden downstream on both watercourses and drainage systems.
-

APPRAISAL

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

- (a) *Watford Local Plan Core Strategy 2006-31;*
- (b) the continuing “saved” policies of the *Watford District Plan 2000;*
- (c) the *Hertfordshire Waste Core Strategy and Development Management Policies Document 2011-2026;* and
- (d) the *Hertfordshire Minerals Local Plan Review 2002-2016.*

Environmental Impact Assessment Scoping Opinion

The development constitutes an urban infrastructure project within Schedule 2, Class 10(b) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 and involves the development of a site exceeding 0.5 hectares within an urban area. The proposal therefore falls within Schedule 2 of the Regulations and was therefore considered against the criteria in Schedule 3. Having regard to the criteria in Schedule 3 and the provisions of Circular 2/99 it was concluded that an Environmental Impact Assessment was required in this case.

A Scoping Opinion was issued by the Council on 28th February 2014. It was agreed that the following topic areas could be ‘scoped out’ of the environmental statement and would not, therefore, require further assessment:

i) Impacts on Geology.

A full Environmental Statement was submitted with the application containing an evaluation of the key environmental issues, potential adverse impacts and proposed mitigation measures relating to the proposed development. That Statement has been taken into account in assessing the proposed development.

Principle of development

The outline planning permission granted in 2010 established the principle of a major, comprehensive redevelopment of the site to form a new Health Campus. This has subsequently been included in the Council's adopted Core Strategy as one of the main elements of the spatial strategy for the Borough as a Special Policy Area (Policies SS1 and SPA3). Integral to the approved masterplan was the provision of a new access road from Dalton Way through to the existing hospital site. This remains the case. In December 2013 full planning permission was granted for a new access road extending from Dalton Way in the east to Willow Lane in the north-west (ref. 13/00971/FULM). This comprises a Link Road between Dalton Way and Wiggenhall Road, and an Access Road from Wiggenhall Road to Willow Lane incorporating a bridge over the disused railway line (to be used for the Croxley Rail Link). It also included new junctions at Dalton Way, Wiggenhall Road and Willow Lane and a junction within the site north of the new bridge. The current masterplan is based upon this approved road layout.

Policy SPA3 Health Campus has as its objective:

“To deliver a major mixed use development project providing a new quarter for west Watford which seeks to provide new housing, jobs and community facilities with the catalyst of a significantly enhanced new acute hospital. This new quarter will be integrated seamlessly with the existing surrounding neighbourhoods, will enhance the local services and amenities for the existing local communities in west Watford and is expected to provide in the order of 1,000 to 1,900 new jobs.”

The policy also sets out the requirements for the Health Campus SPA as follows:

- Improved major acute hospital providing new facilities for patients and staff.
- Residential development (at least 500 new homes) including affordable housing.
- Commercial office development.
- Local centre shops and community facilities.
- Leisure facilities including the support of Watford Football Club as an important local asset.
- New combined heat and power plant.
- New road access arrangements to alleviate congestion on Vicarage Road and site circulation improvements to assist walking and cycling.
- Traffic signaling improvements to Junction 5 of the M1 motorway.
- Improved quality and quantity of green infrastructure.
- A primary school.

The new development should also be of high quality design, making the most of opportunities for energy conservation, renewable energy provision and water recycling; maintain and add to open space for recreational and biodiversity purposes; provide local employment opportunities and affordable and key worker housing; and be designed to reduce flood risk.

The application is a hybrid application with the main masterplan for the whole site submitted in outline and detailed permission sought only for the Business Area South. Although the masterplan is in outline, defined by a set of broad parameter plans, it is supported by a Design and Access Statement and a Design Guide, together with an illustrative masterplan, that set out how the masterplan may be implemented over the next 15-20 years. This information allows the masterplan to be assessed against Policy SPA3 and, more generally, against the other policies of the Core Strategy. This information and, more specifically, the range of uses, number of dwellings and the overall floorspace figures proposed, have been used to assess the potential environmental impacts of the development within the Environmental Statement.

i) Improved major acute hospital providing new facilities for patients and staff.

The original masterplan approved in 2010 provided for a new build acute hospital within a single building. This was intended to be funded through a Private Finance Initiative (PFI). This source of funding is no longer available and a single, large new hospital building is no longer an option for the NHS Trust. The NHS Trust is currently undergoing a review of its clinical strategy which is not expected to be completed until spring 2015. This in turn will inform a new estate strategy for the delivery of new hospital facilities across the 3 sites owned and operated by the NHS Trust (Watford, St Albans and Hemel Hempstead). At present, the most likely scenario is that the acute hospital for West Hertfordshire will remain at its current site but will be redeveloped through a combination of some of the existing hospital buildings being retained and refurbished, some being demolished and replaced with new buildings, and other new buildings being provided to support new services and facilities.

ii) Residential development (at least 500 new homes) including affordable housing.

The masterplan proposes up to 681 new dwellings, distributed between the Riverside (460), Central (149) and Cardiff Road (72) development areas. The supporting information states that 35% of the new dwellings will be affordable and these will be brought forward as each of the development areas containing residential dwellings is developed.

iii) Commercial office development.

The masterplan includes commercial floorspace for various uses including offices and laboratories (Classes B1(a) and B1(b)) within the Hub development area and industrial and warehousing uses (Classes B1(c), B2 and B8) within Business Area North and Business Area South. The total commercial floorspace proposed is 3,685m² (GEA) for offices/laboratories and 8,477m² (GIA) for industrial and warehousing uses. The full potential floorspace may not be developed but 6,950m² (GIA) of mixed industrial and warehousing floorspace is proposed as part of the detailed element of Business Area South.

iv) Local centre shops and community facilities.

The original masterplan included 5,025m of floorspace for uses within Classes A1, A2 and A3 (retail, professional and financial offices and restaurants). This was to be located within a new local centre close to Vicarage Road on the site of the current Hub development area. The current masterplan includes provision for up to 5,620m of floorspace for uses within Classes A1, A2, A3, A4 and A5 (the latter 2 uses being drinking establishments and hot food takeaways). This floorspace is to be provided within the Hub (1,015m²) and the Central (4,605m²) development areas. The main focus of the new local centre will be the Central area where the uses are intended to be accommodated around a new central public square and to serve the new residential dwellings within the masterplan as well as the wider locality. The proposed uses within the Hub are intended to complement the proposed hotel and other ancillary hospital uses (including a replacement for the Spice of Life restaurant) within this development area and principally serve staff and visitors to the hospital. The two areas are to be linked by a north-south route that will form part of a pedestrian link between Vicarage Road with the River Colne to the south.

Although community facilities are referred to in Policy SPA3 (in addition to the hospital provision), no community facilities are proposed as part of the masterplan.

v) Leisure facilities including the support of Watford Football Club as an important local asset.

The masterplan includes 1,719m² of leisure floorspace, with 690m² shown within the Central development area and 1,029m² within the Cardiff Road development area. The exact location of these uses is not known but it is suggested within the illustrative masterplan that they could form ground floor units fronting the roundabout within the site. The location of the leisure uses adjacent to the roundabout would not, in itself, be inappropriate but would result in the leisure uses being divorced from the local centre and somewhat isolated. As such, the provision of these uses will need careful consideration at detailed design stage. The nature of the leisure uses is not known.

vi) New combined heat and power plant.

No combined heat and power plant is proposed as part of the current masterplan. The original masterplan did include a new combined heat and power plant as part of the development of the new hospital. However, as the hospital as currently proposed will be developed over many years and many phases, including the retention of existing buildings as well as new buildings, the existing hospital energy centre is to be retained (within the southern part of the Hub development area). This will not, therefore, be available to provide heat and power to the proposed residential and commercial buildings. The underlying requirement for the provision of any combined heat and power plant is the need for a high base load across a 24 hour period. The hospital would be ideal for this, operating as it does 24 hours a day and with a high, constant need for both heat and power. In the absence of the hospital, the proposed residential and commercial uses alone would not be able to meet this underlying requirement, even if they were all to be provided in a short period of time. As such, the provision of a combined heat and power plant to serve the whole development cannot be justified.

In order to increase energy efficiency of the residential and commercial buildings, local combined heat and power plants are proposed within the individual buildings. This is discussed in more detail in the 'Sustainability, energy and waste section' below.

vii) New road access arrangements to alleviate congestion on Vicarage Road and site circulation improvements to assist walking and cycling.

The new Link Road and Access Road was approved in December 2013 and meets this requirement.

viii) Traffic signaling improvements to Junction 5 of the M1 motorway.

This was a requirement of the original masterplan and the Highways Agency has confirmed that it remains a requirement for the current masterplan. This can be secured by condition or Section 106 agreement, as appropriate.

ix) Improved quality and quantity of green infrastructure.

The existing site includes various existing areas of green infrastructure although some of these are much degraded and of poor quality. These include the Willow Lane woodland (the former allotments), areas alongside the River Colne, areas of grassland, scattered areas of trees and dense shrubs and a County Wildlife Site on part of the former Carriage Sheds site. The latter has been heavily degraded in past years and has lost much of its original value. Also included within the wider masterplan area are the Oxhey playing fields, part of which will be lost through the provision of the approved Link Road. Some of these areas will be lost as a result of the masterplan development, including most of the Willow Lane woodland, and areas of grassland, trees and shrubs within the site, and these will need to be replaced. Other areas will be heavily impacted by the scheme but offer opportunities for the improvement in the quality of green infrastructure. These include the River Colne and its banks and the County Wildlife Site.

The masterplan proposes the provision of 1.83 hectares of amenity green space within the site together with other landscaping across the site. Much of this is undefined but 2 areas of green infrastructure provision are known; the formation of a new wildlife area on the site of the County Wildlife Site within Business Area South and the formation of Colne Island between the river and the railway embankment which will form part of the Riverside development area. This provision will be assessed in the 'Biodiversity and green infrastructure' section below.

x) A primary school.

The masterplan does not include the provision of a new primary school but does include an area of safeguarded land in the western corner of the site to the rear of Laurance Haines school. The applicant is currently in discussions with the County Council regarding the expansion of the school by one form of entry (1FE) to help meet the demand for primary school places generated by the proposed residential dwellings. The safeguarded land is intended to facilitate this expansion including the provision of a new access/egress.

Hospital provision

Discussions between the NHS Trust and the Watford Health Campus Partnership have identified the likely level of floorspace the NHS Trust will require for an acute hospital and the land required for the optimum and most effective locations for new hospital buildings to provide full flexibility and allow appropriate adjacencies to be made. The outcome of these discussions is that three of the development zones within the masterplan include provision for hospital buildings – the Existing Hospital, the Hub and the Central development areas. In addition to this, part of the Cardiff Road development zone is intended to provide a car park for hospital staff to replace the current temporary car park on the Cardiff Road industrial estate. No development is currently proposed within the Existing Hospital development area, with the Hub and Central development areas being the locations identified for new hospital buildings. It should be noted that the western part of the Farm Terrace Allotment site has also been identified for future hospital buildings and this forms part of the outline masterplan for that site, the subject of application ref. 14/00512/OUTM. In effect, the masterplan safeguards the land within these development areas for hospital use not only to provide sufficient land for the anticipated floorspace required but also to give the necessary flexibility to provide new and decanted facilities whilst allowing the continued full operation of the existing hospital.

The letter of representation from the NHS Trust clearly supports this approach and states that the land safeguarded by the masterplan will allow an appropriate strategy to be developed and a phased implementation of this strategy to be undertaken. It remains the case that the new hospital buildings and facilities will be provided by the NHS Trust and not by the applicant. The applicant is not, therefore, able to give any details of the new hospital buildings that may be provided in the future, where they will be provided within the various development areas or when they will be delivered. Indeed, the NHS Trust itself is unable to give this information until its clinical strategy has been approved and a subsequent estates strategy has been developed. What the masterplan does aim to achieve, importantly, is the safeguarding of the land considered necessary for the provision of improved major acute hospital facilities on the site.

Housing

The masterplan proposes up to 681 new dwellings, distributed between the Riverside (460), Central (149) and Cardiff Road (72) development areas. Indicative housing mix schedules give the following breakdown of units by type and number of bedrooms:

Hybrid Masterplan	Number of Units	Percentage Mix
1 bed flat/maisonette	223	32.7%
2 bed flat/maisonette	375	55.1%
3 bed maisonette	10	1.5%
3 bed house	73	10.7%
		100%
Total flats/maisonettes	608	89%
Total houses	73	11%
Total dwellings	681	100%

This breakdown is only illustrative and could change as each of the development areas comes forward.

Policy HS2 gives an indicative housing mix requirement taken from the Strategic Housing Market Assessment study that gives the following broad overview of all housing requirements in the Borough to 2021:

	Size	Percentage
All housing (market and affordable)	1 bedroom	25.8%
	2 bedroom	18.7%
	3 bedroom	48.2%
	4 bedroom	6.7%
	5+ bedroom	0.6%

It can be seen from this breakdown that the illustrative mix of dwellings to be provided within the masterplan is not a close match. However, the high percentage of flats reflects

the nature and character of the site, the various constraints on the development and the high density nature of the proposed development. The physical characteristics of the site reflect its location partly within the River Colne valley and partly extending up the northern valley side. The consequences of this are that parts of the site fall within or adjacent to the river floodplain whilst the valley side itself is very steep in places. Policy SS1 also promotes higher density development within the Health Campus SPA while Policy SPA3 proposes a minimum of 500 new dwellings within the site. It is also important to recognise that the Health Campus is a significant site in delivering and meeting the Council's 5 year housing supply and its overall housing targets. The overall number of dwellings proposed and the indicative mix of sizes is therefore considered appropriate and acceptable in principle.

Policy HS3 of the Core Strategy sets out the requirements for affordable housing at 35% of the total number of dwellings and also gives a tenure breakdown as a guide to meet current needs. An affordable housing statement has been submitted with the application which sets out the intended approach for the delivery of affordable housing across the site. This states that the applicant is committed to delivering 35% affordable housing across the site in accordance with Policy HS3. Based on a total provision of 681 dwellings, this would deliver 238 affordable dwellings. The actual mix and tenure of affordable dwellings is the subject of continuing discussions with the Council's Housing team. With regard to the location of affordable housing, it is intended that this will be distributed across the site and will be integrated with market dwellings rather than being concentrated in one area. The delivery of affordable dwellings is intended to be phased over time to provide a more regular supply and to be flexible in meeting changing needs.

The affordable housing provision, including the proposed mix and tenure, will need to be secured through a s.106 legal agreement. As no actual details of the residential elements of the scheme are known at present, an affordable housing delivery strategy will need to be secured through the s.106 before any residential units are delivered.

Employment uses

Policy SS1 of the Core Strategy sets out the strategic target of providing 7,000 additional jobs in the Borough to 2031. In Policies SPA3 and EMP1, the Health Campus development is expected to contribute between 1,000 and 1,900 new jobs across a wide range of sectors.

The main focus for new business/commercial employment floorspace is within the two business development areas alongside the new Access Road. These will provide up to 8,477m² (GIA) floorspace for industrial and warehousing uses in a range of unit sizes and are anticipated to provide up to 242 new jobs. Other office/laboratory uses are located within the Hub development area (up to 3,685m²) and are expected to be provided within mixed-use buildings alongside healthcare uses and could provide up to 313 new jobs. Other jobs will be provided through the provision of new hospital facilities (371 jobs), retail/commercial uses (337 jobs) within the local centre and leisure/hotel uses (57 jobs). Overall, the masterplan has the potential to provide up to 1,320 new jobs across a wide range of skills, in accordance with Core Strategy policies.

Retail, leisure and commercial uses

Policy TLC1 states that most new retail and leisure floorspace will be delivered within the town centre but that some new retail and leisure floorspace will also be delivered within the Health Campus SPA, as well as within other SPAs, subject to the proposals being of an appropriate scale and there being no significant adverse impact on the vitality and viability of the town centre or planned investment at Charter Place. The supporting text to the policy TLC1 describes local centres as typically comprising up to 1,000m² of floorspace and neighbourhood centres comprising between 1,000 and 5,000m². The proposed level of floorspace clearly falls within the category of a neighbourhood centre whereas Policy SPA3 refers to a local centre. However, it should be noted that this is also the case for the level of floorspace approved as part of the original masterplan.

A Retail Statement has been submitted with the application and comprises a sequential assessment and retail impact assessment. This assesses the potential impact of the

proposed floorspace provision on the vitality and viability of the town centre as well as on more local centres. It included the potential impact of a single Class A1 foodstore of 2,125m² with approximately 3,495m² of other Class A1-A5 floorspace. The assessment concluded that the proposed centre, including a foodstore of this size, would not have a significant adverse impact on the vitality and viability of the town centre or planned investment at Charter Place.

The Council's Retail Study Update – Watford Site Allocations Stage 1 Report (September 2013) updates the quantitative capacity forecasts for additional convenience and comparison goods floorspace in the Borough over the period 2013-2028, further to the Watford Retail Study (2011) which was undertaken in 2010. The update includes two committed provisions: the new Morrisons store (which was under construction at the time) and the Health Campus, which was assumed to provide 2,823m² net convenience floorspace (Class A1) (which would equate to an approximate turnover of £37m). Based upon these commitments, current market shares and forecast growth in population and retail expenditure, the report identifies capacity to support additional convenience floorspace of approximately 2,714m² net up to 2018 rising to 6,229m² net up to 2028 and capacity to support additional comparison floorspace of approximately 7,510m² up to 2018 rising to 47,128m² net up to 2028. The level of convenience and comparison goods capacity that has been identified exceeds previous estimates and is attributed to greater population levels arising out of the 2011 Census and the consequent increase in predicted expenditure.

Having regard to the conclusions of the Retail Statement submitted with the application and the Council's Retail Study Update, it is considered that the overall level of floorspace proposed for uses within Classes A1-A5, including a convenience foodstore of up to 2,125m², is acceptable. Of the 3,495m² of floorspace for other Class A1-A5 uses, the mix of uses and size of units will need to be restricted by condition.

Transport, highways and car parking

Access strategy

The key principles for highway infrastructure to serve the outline masterplan remain as with the previously consented masterplan, namely:

- a) to provide safe and efficient access for all users associated with the site by all modes of travel including the mobility impaired;
- b) to provide a reliable route for ambulances to the hospital;
- c) to provide a reliable route for emergency drop-offs to the hospital;
- d) to provide linkages and infrastructure which enhance the accessibility of the site by public transport and other sustainable modes of travel as well as by private car;
- e) to provide pedestrian and cycle routes which fully integrate with the wider area;
- f) to facilitate legible way-finding with the hospital and the other land uses;
- g) to facilitate bus movements through the site;
- h) to prevent 'rat-running' through the site and the adjacent residential areas such as Willow Lane and Cardiff Road from the surrounding area;
- i) to be flexible to facilitate access to the evolving hospital redevelopment proposals and any changes of use of the allotments if they are re-located; and
- j) to minimise the impact of the development on the wider local highway network.

Traffic and transport impact

The following scenarios have been modelled to assess potential tariff impacts in respect of traffic flows and junction capacity on the surrounding road network:

- 2023 Assessment Year for the hybrid masterplan and the Farm Terrace Allotment outline scheme, and incorporating the approved Link Road and Access Road.
- 2023 Assessment Year for the hybrid masterplan but excluding the Farm Terrace Allotment outline scheme, and incorporating the approved Link Road and Access Road.

To establish the baseline traffic conditions for the Transport Assessment, a comprehensive series of traffic surveys were commissioned in May 2013. These consisted of 21 automatic traffic counts and pedestrian/cyclist count surveys, manually classified turning counts at 15 junctions and pedestrian counts at 6 locations. In combination with information supplied by the County Council on the operation of traffic lights around the site, an assessment was made of the operation of the local road network. In addition road collision data was studied to identify trends and areas that might be impacted adversely by the proposals.

The predicted traffic generation figures and distribution of traffic with the approved Link Road and Access Road has been compared to the predicted figures for the consented 2010 masterplan. The assessment demonstrates that the vehicular trip generation for the proposed masterplan is slightly less than that predicted for the 2010 masterplan. Although a number of junctions are predicted to operate close to or at capacity, they will nevertheless perform slightly better than predicted for the 2010 masterplan. As such, the proposed masterplan will have no additional adverse impacts on the highway network or junction capacity.

As with the approved 2010 masterplan, the Transport Assessment has identified the need for off-site highway mitigation at the Lower High Street/Dalton Way junction and Junction 5 of the M1. The latter requirement has also been identified by the Highways Agency. With regard to the Lower High Street/Dalton Way junction, various alterations to this junction have been considered to maximise traffic capacity whilst also ensuring adequate pedestrian crossing facilities are maintained across all the arms of this junction. These alterations will need to be finalised with Hertfordshire County Council and can be secured through a s.106 agreement.

The improvements to Junction 5 of the M1 comprise improvements to the signal operation in the form of the introduction of MOVA control. This has been agreed with the Highways Agency who have also agreed the timing of the works, which should be undertaken when

the new floorarea created gives rise to 30 two-way trips in an hour at the junction. These works can also be secured through a s.106 agreement.

Section 106 payments

As part of the 2010 approved masterplan, Hertfordshire County Council agreed a package of financial payments, as set out below. Having initially requested the same financial payments be made for the proposed masterplan, the County Council has now agreed a revised package of payments, as detailed below:

	2010 Masterplan	Revised payments
Traffic Calming Measures	£250,000	£232,949
Enhancement of Public Transport Infrastructure related to development	£450,000	£50,000
Towards enhancement of cycleways and footways within 700 metres of site	£175,000	£175,000
10 payments of £100,000 towards new on-site bus stops and improvement to bus services in west Hertfordshire	£1,000,000	£600,000 (over 5 years)
£30,000 towards implementation of appropriate extensions to CPZ	£30,000	£30,000
Total S106 Contribution	£1,905,000	£1,087,949

Since the payments for the previously consented masterplan were negotiated in 2008, funding has been secured for the Croxley Rail Link which is due to be operational by 2016. A new station is proposed on Vicarage Road only 410m to the west of the existing main entrance to the hospital site. This will provide improved accessibility to the site by public transport. As such, it has been agreed that the previously agreed funding for enhanced public transport infrastructure and enhanced bus services can be reduced accordingly.

Car parking

The existing hospital use has 1462 parking spaces for staff and visitors. The NHS Trust has indicated that it will require 1662 spaces for the expanded hospital, which is slightly lower than a pro-rata increase based upon current levels and the predicted additional floorspace provision. It is proposed that the majority of staff parking spaces will be provided within the Cardiff Road development zone in the form of a new, single decked car park located adjacent to the railway line (Croxley Rail Link), providing an estimated 650 spaces. It is anticipated that all visitor spaces and some staff spaces (estimated total of 603 spaces) will be provided as part of an underground car park within the Central development area. This car park will also serve the new local centre and residential dwellings within this development area (estimated 290 spaces).

It is perhaps surprising that the hospital staff parking is proposed to be provided in the Cardiff Road development zone. Firstly, the primary emphasis in this zone is on residential development and it is difficult to see how a decked car park can be compatible with such a use. Secondly, it seems illogical to place hospital staff parking at such a distance from the hospital development areas; it would be more appropriate for staff parking to be provided with the new hospital buildings in the Central zone, utilising the slope of the land to provide basement or undercroft parking. Thirdly, such a major structure is likely to present considerable urban design problems in this location, given the domestic scale expected from the residential development in this area, although, in the absence of such detail in an outline planning application, it is difficult to judge what the precise impacts might be.

The mix of uses within the masterplan will allow the opportunity for shared use of some car parking spaces, particularly those within the Central development area where demand from different uses will vary throughout the day. The site will also benefit from improved accessibility from the Croxley Rail Link and enhanced bus services. These factors will allow opportunity for car parking provision for the residential element in particular to be tailored accordingly. Within Vicarage ward the average car ownership for all residential properties (houses and flats) is 0.98 car per household. The majority of the dwellings proposed within the masterplan are flats (89%). It is therefore proposed that residential car

parking is provided at a general level of 1 space per flat and 2 spaces per house with visitor parking being provided on a more flexible basis, including the use of shared spaces. Overall, the estimated provision for the 681 residential properties is 894 spaces (1.3 spaces per dwelling) compared to a maximum provision of 1,028 spaces based upon the Council's maximum standards (1.5 spaces per dwelling). This is considered to be an acceptable level of provision across the site but will require careful management to ensure that uncontrolled street parking does not occur on the roads and shared surfaces. A car parking management plan will therefore need to be secured for the site, to include the provision and allocation of spaces, the enforcement of on-street parking and management of parking charges.

For the detailed element, Business Zone South, the number of parking spaces is shown. The main unit (1), at 4,883m² (GIA), has a provision of 85 spaces. The 6 smaller units (2-7), with a total floorspace of 2,067m² (GIA) have a provision of 43 spaces. The site currently falls within Parking Zone 4 where the requirement would be for 75-100% of the maximum standard to be provided. For the proposed uses, the range of parking provision would be as follows:

Use	Council Parking Standards (75-100%)	
	Unit 1	Units 2-7
Class B1(b) and (c)	104-139	44-59
Class B2	73-97	31-41
Class B8	49-65	20-27
Mean range	75-100	31-42
Proposed provision	85	43

Having regard to the different sizes of units proposed and the range of flexible uses they could each be used for, it is considered that the proposed levels of parking are acceptable.

Servicing

For the masterplan site, adequate servicing facilities for each building will need to be demonstrated within the reserved and detailed matters for each development zone and phase of development. For Business Zone South, vehicle tracking diagrams have been submitted as part of the Transport Assessment to demonstrate that all units can be adequately serviced by the size and type of vehicle appropriate to the unit.

Travel Plan

A Framework Travel Plan has been submitted with the application. Given the large, mixed use nature of the masterplan scheme, a three tier organizational structure is proposed consisting of an overarching Travel Plan Steering Group, a site wide Sustainable Travel Manager and, finally, individual Travel Plan Co-ordinators for individual land uses. Each will have a different role in ensuring the effective implementation of a range of sustainable travel measures aimed at encouraging and maximising sustainable travel modes and minimising the use of the private car. The setting up of the three tier organisational structure, the funding of this and the implementation of the Travel Plan will need to be secured through a s.106 agreement.

Sustainability and renewable energy

A Sustainability Statement and an Energy Strategy have been submitted with the application, setting out the objectives for the masterplan. The Sustainability Statement includes the aspiration to achieve BREEAM 'Very Good' for the non-domestic buildings and Code for Sustainable Homes (CfSH) Level 4 for the residential buildings. These are considered to be the minimum standards that should be achieved for a development within a Special Policy Area, in accordance with Policy SD3 of the Core Strategy.

Environmental Health have noted in their comments that the tender bid at Best and Final Offer (BaFO) stage was based on an 'Excellent' standard being achieved, however, there is no planning policy basis for this standard to be required. The standard of 'Very Good' is sought as a minimum and there is no reason why the applicant should not seek to achieve a high standard of 'Excellent'. It is recognised that sustainability standards will become more stringent over time and many environmental criteria will be strengthened through or

incorporated within the Building Regulations. This will be particularly relevant for a development such as the Health Campus which is likely to be delivered over a period of 15 years or more. As such, these standards are considered an appropriate baseline position. A BREEAM Industrial Pre-Assessment for the detailed Business Zone South demonstrates that a rating of 'Very Good' is achievable.

The Energy Strategy sets out how the low carbon targets to accord with BREEAM 'Very Good' and CfSH Level 4 will be achieved. The mandatory requirement for dwellings is to achieve a reduction of 25% per year when compared with Part L of the 2010 Building Regulations. It is proposed that this will be achieved through a range of 'lean', 'clean' and 'green' measures. 'Lean' measures include adopting construction techniques that achieve improved thermal performance and ventilation with heat recovery. 'Clean' measures include the use of high efficiency building services to minimise energy consumption. 'Green' measures include the proposed use of low and zero carbon technologies such as combined heat and power units for individual buildings and solar photovoltaic panels. The reductions in carbon emissions achieved through these measures will accord with the latest Part L of the 2013 Building Regulations.

The targets for non-domestic buildings are based upon the need to comply with Part L of the 2013 Building Regulations and achieve BREEAM 'Very Good'. It is estimated that these can be achieved through the use of 'lean' and 'clean' measures with the use of low and zero carbon technologies not being necessary. For the detailed Business Area South, the estimated reduction in carbon emissions is 28%. For other non-domestic buildings within the masterplan, the figure is 10%. These figures are based on comparison with the 2010 Building Regulations.

Landscape and visual impacts

The topography of the site is very varied, with land levels along the River Colne valley bottom at 50-53m above ordnance datum (AOD) rising to over 70m AOD towards Vicarage Road at the top of the valley side. The quality of land is also very varied with higher quality land at Oxhey Park and very poor quality land at the former Carriage Sheds

site and Cardiff Road industrial estate. The existing substantial hospital buildings and football stadium dominate the skyline visually. Overall, the landscape character is predominantly urban fringe with significant areas of degraded land and poor townscape.

The Landscape Assessment has identified 13 character areas within and adjacent to the site and considered their sensitivity to change. Only two areas, Oxhey Park playing fields and the south-side corridor of the River Colne, are considered to be of medium sensitivity due to their high value as public parks and open spaces. The remaining areas of the site are considered to be of low sensitivity due to the generally poor quality of buildings and degraded nature of land. The surrounding residential areas have a dense urban form lacking in heritage designations and listed buildings, with the exception of The Square conservation area and the listed 'I-Block' building within the existing hospital site.

Significant views of the site are relatively limited, despite the location of the site on the northern valley side of the River Colne, due to the screening effect of existing buildings, railway embankments and existing mature trees. Views of the site are predominantly from the south (The Rookery residential area to the south of Riverside Road) and south-west, although views are still restricted in many places by existing mature trees. Other fleeting views are gained from the raised railway embankment to the east of Wiggshall Road. For these reasons, relatively few residential properties will have direct views of the proposed development.

The proposed masterplan constitutes a major urban redevelopment within an existing, low quality urban area comprising car parking areas, open storage uses and low scale commercial buildings set against the large scale buildings of the hospital and Vicarage Road Stadium on the valley ridge. Over most of the masterplan site, the change in the scale, character and appearance of the site will be substantial and significant. However, within this context, the masterplan is considered to have an overall beneficial impact through high quality design, integration with the surrounding urban context, the opening up of the river corridor as a significant new linear space and the creation of new green infrastructure. Due to the relatively limited views of the site from public open spaces and

roads and the more distant and glimpsed views from sensitive receptors such as existing residential occupiers, there are considered to be few significant visual impacts arising from the scheme. The main significant visual impacts will arise during the various construction phases of the development but there are limited measures that can be undertaken to mitigate these due the nature of construction works.

Recreation and open space

As part of the highways infrastructure works application, a package of replacement recreation measures was secured through a s.106 agreement to mitigate the loss of existing facilities at Oxhey Park playing fields as a result of the construction of the Link Road. These included:

- new Gaelic football pitch and changing rooms at Radlett Road playing fields (this was granted planning permission on 7th August 2014);
- new football pitch at Gammons Lane playing fields;
- resurfacing of existing tennis courts at Watford Heath or Gammons Lane playing fields;
- new multi-use games area (MUGA) to be provided at Riverside Road recreation ground (this was granted planning permission on 21st November 2013).

This provision not only provided replacement facilities but also provided a significant increase in the quality of the facilities as the existing facilities were in poor condition. As a result of this replacement provision, Sport England has raised no objection to the masterplan proposal as a statutory consultee. However, as a non-statutory consultee, it has raised an objection on the grounds that the masterplan does not provide for additional sports facilities to meet the additional demand that will arise from the masterplan. This position is not consistent with Sport England's position on the previously approved masterplan which was considered as a single application incorporating the new road. In this case, it was considered that the package of replacement facilities, which remains essentially unchanged, was sufficient for the whole masterplan. Furthermore, the approved replacement facilities are of a significantly higher quality than those they replace

which were in poor condition. This is particularly the case with the replacement Gaelic football pitch, new changing rooms and MUGA. Finally, due to the constraints of the masterplan site and its topography, it is not practicable to provide new sports facilities on the site. It is therefore considered that the approved package of replacement facilities is sufficient and that no additional off-site provision is required.

With regard to open space, there will be significant losses on the site arising from the proposal. These will be principally the loss of the woodland on the former Willow Lane allotments (which also forms an ecological and green infrastructure asset) and the loss of part of Oxhey Park playing fields along the line of the Link Road. A Landscape Strategy has been submitted, based upon the illustrative masterplan, which sets out how new high quality open space, in the form of amenity green space and hard landscaped shared surfaces and squares, could be provided across the site within the different development areas, reflecting the nature and character of these different areas. The actual location, size and nature of the open space will only be determined at reserved matters stage but it is proposed that up to 3.98 hectares of open space could be provided, comprising 1.84ha of amenity green space and 2.15ha of shared surfaces and squares.

However, it should be noted that these figures include areas of general soft landscaping (i.e. along the Access Road and alongside footpaths) and all shared surface roads and footpaths necessary for the development. They are not, therefore, open space in the sense of Policy L8 of the Watford District Plan. The actual level of provision is therefore likely to be significantly less than the figures set out above, resulting in an overall loss and subsequent deficit of open space within the masterplan site. Whilst this is regrettable, it is often the case with high density urban developments that the requirements of Policy L8 cannot be met but there is the opportunity to ensure the open space provided is high quality and high value to the residents and visitors to the site. Furthermore, in accordance with Policy L8 and Policy INF1 of the Core Strategy, it would be appropriate for the Council to seek a financial contribution towards open space provision (in accordance with SPG10) in lieu of any deficit in provision within the site by means of a s.106 planning obligation.

The Landscape Strategy considers the character of each development area, the topography of the site, sustainable drainage requirements and the form and type of open space appropriate to each area:

- Hub – this area will be a formal, tree lined boulevard with high quality shared surfaces, seating and rain gardens.
- Central – the central square will be the focus of this area, less formal than the boulevard but with high quality shared surfaces, and more extensive sustainable drainage features and soft landscaping.
- Cardiff Road – this area will have green amenity areas and play space reflecting the more domestic scale of development and the adjacent residential area of Cardiff Road.
- Riverside – the River Colne will be the focus of a new linear park incorporating open water, sustainable drainage pools, riverside landscaping and amenity green space. There will also be links across the river to Colne Island, a new area of open green space between the river and railway embankment.
- Riverside (Willow Lane) – the western part of this development area is on the steep valley slope where remnants of the existing woodland will be retained and new wooded areas planted.

Overall, it is considered that the Landscape Strategy will provide an acceptable framework for the provision of high quality open space that will contribute to the distinctive character of each of the development areas whilst helping to knit together these areas to form a cohesive, high quality development.

The provision of children's play areas is also considered within the Landscape Strategy. Across the hybrid masterplan site it is proposed to meet the need for play facilities in accordance with saved Policy L9 of the Watford District Plan. This provision comprises two local equipped areas of play (LEAPs) and five local areas of play (LAPs) within the site. It is not proposed to provide a larger neighbourhood equipped area of play (NEAP)

within the site although it is proposed to make this provision within the Farm Terrace Allotment site. In the event that this site does not come forward, the nearest NEAP will be at Riverside Recreation Ground to the south of the River Colne.

Biodiversity and green infrastructure

The site does not contain any statutory designations for nature conservation; however, the Lairage Land, a Local Nature Reserve, is located immediately to the south of the site. There are also two non-statutory designated County Wildlife Sites located along the southern site boundary of the site, the Croxley Green Junction Sidings (on part of the former Carriage Sheds site) and the Oxhey Park River Margins (located along the River Colne). Outside of the areas of industrial land and buildings, the main habitat types are broad-leaved semi-natural woodland, scrub, semi-improved neutral grassland, wet woodland, tall ruderal and riparian vegetation. With regard to invasive species, Himalayan balsam is present along the River Colne corridor with Japanese knotweed also located along the corridor and on bunds across the site. These habitats were identified in an Extended Phase 1 Habitat Survey which also included an assessment of these habitats for their potential to support, and evidence of, protected species.

Habitats

The proposed masterplan will result in the loss of significant areas of habitat across the site as well as having other potential impacts:

- loss of a large number of individual trees including mature trees;
- loss of broad-leaved semi-natural woodland;
- loss of semi-improved neutral grassland;
- loss of habitat designated for its wildlife potential;
- direct and indirect deterioration of habitat through increased recreational use and vandalism;
- potential for direct and indirect pollution and siltation of the River Colne;
- potential for spread of non-native invasive species.

Bats

Transect and emergence surveys for bats were undertaken across the site in 2006, 2012 and 2013. No bats were seen emerging from any of the buildings surveyed. Low levels of activity by common pipistrelle, soprano pipistrelle and noctule were recorded across the site. In addition, brown-long eared bats have been recorded in the woodland area to the south-west of the site. The bat activity of the site is considered to be low.

Breeding birds

The habitat available on site would support a number of common breeding bird species, in particular the woodland, trees and dense scrub. Direct mortality and habitat loss are significant adverse impacts on breeding birds.

Reptiles

Reptiles were surveyed in 2006 and 2012 and slow worms and grass snakes were found to be present within the site boundary. In preparation for the commencement of the highways infrastructure works and the Croxley Rail Link, 500 slow worm and two grass snakes were translocated from the Colne Island site and 132 slow worms and one grass snake from the rest of the site. Individual animals have been translocated to the Lairage Land local nature reserve, immediately to the south of the site, and the former Brightwell Farm site on Vicarage Road. Some individuals have also been translocated to a nature reserve at the University of Hertfordshire. All habitats suitable for slow worms and grass snakes have been destructively searched and removed.

Badgers

A single annex badger sett was found during the 2006 surveys. This was subsequently declared disused during the 2012 surveys. Mammal paths were located within the site boundary during the 2012 survey; however, no signs indicating that they belonged to badger were found. In the most recent survey, no signs of badger were recorded on site and no setts were discovered. Badgers are likely to be using the railway embankment and habitat to the south of the site for foraging and setting. There may be a disused outlier sett within the Croxley Green Rail Sidings Area (from previous survey information) which may

be lost during the demolition works, but as no foraging signs have been noted throughout the site then its disused status is likely to have persisted and there should be no adverse effects.

Water vole and otter

Surveys conducted in 2006 and 2012 failed to find evidence for water vole or otter inhabiting the River Colne and/or the brook. Additionally, the water flow and water quality of the River Colne is poor and evidence of American mink was found during the 2006 surveys rendering the presence of water vole unlikely.

Great crested newts

Results from great crested newt (GCN) surveys carried out in April 2010 on a pond located approximately 300m from the proposed WHC boundary determined that no great crested newts were present. The pond was also considered to be in an isolated location and therefore with low potential to support part of any GCN presence. GCN have therefore been scoped out from further assessment.

Dormice

Dedicated surveys for dormice were carried out in 2006 within the woodland and scrub habitats within the site boundary. No signs of dormouse were recorded and they were not considered to be present.

Habitats Directive

Paragraph 116 of ODPM Circular 06/2005 *Biodiversity and Geological Conservation – Statutory obligations and their impact within the planning system* points out that, when dealing with cases where a European protected species (which includes bats) may be affected, the local planning authority has a statutory duty in accordance with the requirements of the relevant regulations (now the Conservation of Habitats and Species Regulations 2010 (as amended) (“the Habitats Regulations”)) to have regard to the provisions of EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora (“the Habitats Directive”).

Article 12 of the Habitats Directive contains a range of prohibitions seeking to protect certain species (European Protected Species). The species protection provisions of the Habitats Directive, as implemented by the Habitats Regulations, contain three "derogation tests" which must be applied by Natural England when deciding whether to grant a licence to a person carrying out an activity which would harm a European protected species, which licence is normally obtained after planning permission has been obtained. The three tests are that:

- the activity to be licensed must be for imperative reasons of overriding public interest or for public health and safety;
- there must be no satisfactory alternative; and
- favourable conservation status of the species must be maintained.

The Supreme Court, in *R (on the application of Vivienne Morge) v Hampshire County Council* [2011] UKSC 2 and [2011] UKSC 2 considered the duty of the Local Planning Authority in exercising the powers under regulation 9 of the Habitats Regulations. In his leading judgment in the Supreme Court Lord Brown said "I cannot see why a planning permission (and, indeed, a full planning permission save only as to conditions necessary to secure any required mitigation measures) should not ordinarily be granted save only in cases where the Planning Committee conclude that the proposed development would both (a) be likely to offend article 12 (1) and (b) be unlikely to be licensed pursuant to the derogation powers."

The Local Planning Authority must therefore consider whether the carrying out of the development for which permission has been applied for, even if it were to be conditioned, would be likely to breach Article 12(1), by causing the disturbance of a species. If it is concluded that there would be such a breach, the Local Planning Authority must then consider the likelihood of a licence being granted by Natural England.

In this case, in the light of the survey work and analysis carried out as referred to in the preceding sections of this report, it can be concluded that the proposed development would not be likely to harm a European protected species. Consequently, the three tests set out above do not apply in this case, and the issue of a licence by Natural England does not arise.

Ecological impacts

Both Hertfordshire Ecology and the Environment Agency have raised concerns regarding the ecological impacts of the masterplan proposal. Their comments are set out in detail in the Consultations section of this report. Hertfordshire Ecology considers there will be significant direct and indirect adverse impacts on ecology, biodiversity and green infrastructure and that these impacts cannot be mitigated through implementation of a landscape strategy and best practice measures to protect and enhance the remaining habitat. It has requested as mitigation (in relation to the masterplan site) a detailed management plan for the proposed green infrastructure areas and biodiversity off-setting to secure enhanced management elsewhere within the River Colne corridor.

The Environment Agency refers to the requirements of the Water Framework Directive (WFD) and how its objectives will be achieved for the site. These are set out in the Thames River Basin Management Plan (RBMP) which requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery. In respect of the section of the River Colne running through and alongside the masterplan site, a WFD Habitat Survey was undertaken by the Wild Trout Trust in 2012. This survey extended from Lower High Street in the east to the western end of the Lairage Land LNR in the west. This found that the River Colne is currently of moderate ecological status. The Environment Agency considers the only measures that will ensure the masterplan proposal is WFD compliant and will allow the river to achieve good ecological status (by the target date of 2027) are the removal of the weir and sluice in the side channel and the sluice in the main channel. The removal of these structures will prevent the impounding of water, allow the passage of fish and improve the resilience of the river.

The significant direct loss of habitats from the site, the high density nature of the masterplan proposal and the need for green infrastructure to provide informal recreational facilities (i.e. the Colne Island site originally proposed as a wetland area is now proposed as public open space) significantly limit the ability of the proposal to compensate for these losses. The only meaningful options for mitigation are improvements to the River Colne through and within the site and other off-setting measures within the wider river valley. Having regard to the scale of the masterplan, it is considered reasonable and necessary for the works and improvements to the River Colne as required by the Environment Agency should be carried out. Additional measures to improve the river are also set out in the WFD Habitat Survey. Some of these are already being undertaken, such as wetland habitat creation at the Lairage Land LNR, or are planned, such as the treatment and removal of invasive species (under the highways infrastructure works). Other measures could be incorporated as off-setting measures within this section of the River Colne.

It is considered that these measures (which can be secured by s.106 planning obligation) will ensure that appropriate mitigation is incorporated into the scheme, in accordance with Policies GI1 and GI3 of the Core Strategy. However, at the time of writing this report, agreement had not been reached between the applicant and the Environment Agency on these mitigation measures.

The County Wildlife Site within the former Carriage Sheds site (known as Croxley Green Junction Sidings) falls within the detailed element of Business Zone South. Hertfordshire Ecology has expressed concern over the partial loss and degradation of this wildlife site in past and more recent years with the loss of open grassland and scrub. The detailed application proposes to retain this area, together with an area along the north bank of the river, as a wildlife area but with restricted access for educational use only. Existing woodland and scrub will be retained with new woodland and meadow proposed. The area will also include two attenuation ponds as part of the sustainable drainage system for the site which are proposed to be enhanced with reed and marginal wetland planting. Hertfordshire Ecology has expressed some concern at these proposals and whether the site will be capable of achieving County Wildlife Site status as a result. A detailed planting and management plan will need to be provided for this area.

Community facilities

The proposed masterplan will safeguard land for the provision of an improved acute hospital for west Hertfordshire which will be a significant community benefit arising from the scheme. This is discussed in more detail earlier in the report. The provision of open space and recreational facilities both within the site and through replacement provision off-site has also been discussed. The other main demands on community facilities arising from the development relate to education, childcare, youth and libraries, and these are set out in the consultation response from Development Services at the County Council (see the Consultations section of the report).

Primary Education

Hertfordshire County Council (HCC) estimates that the proposed 750 dwellings (including the Farm Terrace Allotment site) would generate demand for 1.43 forms of entry (FE) at primary level. The application site includes safeguarded land to facilitate the expansion of Laurance Haines school by 1FE, supported by a desk top study. HCC is currently still undertaking more detailed feasibility studies to establish whether this expansion would be practicable and whether additional land would also be required, with land at Harwoods Recreation Ground opposite the school potentially being required. In any event, HCC comments that, due to site constraints and topography, this is likely to be significantly more expensive than a normal school expansion. This also leaves an unmet requirement for a further 0.43FE to be met elsewhere in the Borough and this has necessitated a further review of the primary education strategy for Watford.

Policy SPA3 requires a primary school to be provided on the Health Campus site and HCC remains of the view that a 2FE primary school should be provided to meet all the demands arising from the masterplan proposal. At the present time, no agreement has been reached between the applicant and HCC on how or where this level of primary school provision will be met.

Secondary Education

HCC estimates that the proposed 750 dwellings will also generate a demand for 1.35FE at secondary level. This need is being considered as part of a wider need within Watford, Rickmansworth and Bushey and HCC is currently promoting two sites within Three Rivers District for a 6-8FE secondary school. Financial contributions based on the HCC Toolkit are sought in respect of this need which will be pooled along with those from many other sites within Watford and Three Rivers.

Early Years and Nursery Education

Early years provision and nursery education are normally provided on primary school sites. For the proposed 750 dwellings, HCC estimates that as a minimum requirement, a co-located children's centre outreach facility and childcare premises of approximately 250m should also be provided either on the Laurance Haines school site or another site within the masterplan site. At the present time, no agreement has been reached between the applicant and HCC on how this level of early years provision will be met.

Youth facilities

Financial contributions based on the HCC Toolkit are sought towards meeting this need within the Borough. Existing facilities within the town centre would be enhanced to meet additional demand.

Libraries

Financial contributions based on the HCC Toolkit are sought towards meeting this need within the Borough. Existing facilities within the town centre would be enhanced to meet additional demand.

Flood risk and sustainable drainage

A detailed Flood Risk Assessment (FRA) has been undertaken for the whole masterplan site. Parts of the site fall within Flood Zones 1, 2 and 3a, taking into account the deculverting of a tributary channel as part of the approved highways infrastructure works. The majority of the site is within Flood Zone 1 with low risk of fluvial flooding. Areas within

the Cardiff Road industrial estate along the northern bank of the River Colne fall within Flood Zone 2 (medium risk). This risk can be mitigated by raising the ground floor levels above the 1 in 1000 year flood level. A small part of the site within Business Area North falls within Flood Zone 3a (high risk) where the risk of flooding will need to be mitigated through building design or local flood compensation measures. In respect of each of the development areas, a detailed FRA with appropriate mitigation measures will be required.

The site is also located within groundwater source protection zones SPZ 1 (Inner Zone) and SPZ 3 (Total Catchment). Within SPZ 1 there is a high risk of the groundwater aquifer being contaminated by surface water run-off. The masterplan will increase significantly the impermeable area within the site and this will require a sustainable surface water drainage system for the site. A strategy has been developed that zones the masterplan site into a number of areas, aiming to achieve greenfield run-off rates as far as practicable through source control, attenuation and storage of surface run-off on site. This will also prevent any increased risk of fluvial flooding at the site or downstream. In areas of the site within SPZ 1, surface water will be discharged at an attenuated rate into the River Colne, its side channel and tributary via new headwalls. In areas of the site within SPZ 3, infiltration techniques are to be used such as permeable paving and soakaways.

The Environment Agency considers the FRA to be acceptable subject to the imposition of various conditions relating to detailed FRAs and the design of sustainable drainage systems for each development zone and the design of bridges over the River Colne.

Overall, the proposal accords with Policies SD1, SD2 and SD3 of the Core Strategy and Policies SE24, SE26 and SE27 of the District Plan.

Land contamination

The likelihood of contaminated land being present on the site is considered to be high due to the current and former known uses of the land, particularly in the western part of the site, and the evidence from historic ground investigations. The majority of the site is brownfield land that is currently or has recently been used for a range of industrial

purposes, including scrap metal recovery, manufacturing, vehicle repairs, commercial storage and civil engineering depots. The former Carriage Sheds site was originally used as railway sidings for the maintenance of trains and the Cardiff Road Industrial Estate was previously the site of two power stations, a coal fired station from the 1930s and an oil fired station from the 1960s. It is also known that some of the buildings on the Cardiff Road Industrial Estate contain asbestos, and invasive species such as Japanese Knotweed and Himalayan Balsam are present in various locations on the site. It is considered that there may also be a risk of unexploded ordnance on the site.

The site adjoins the River Colne and is partly within the functional river flood plain (Flood Zone 3b). Furthermore, the majority of the site falls within a groundwater source protection zones (SPZ 1 Inner Zone) where any contamination of the groundwater could reach a public drinking water abstraction point within 50 days.

Two desk based studies and an intrusive ground investigation have been carried out for the masterplan site to establish the existing baseline ground conditions. A remediation strategy has also been prepared in respect of the highways infrastructure works application which has been approved by the Environment Agency and the Council's land contamination consultant. The principles within this strategy are also applicable to the wider masterplan area. Subject to further intrusive investigation within each of the proposed development areas, the development of appropriate conceptual site models, and the formulation of a detailed remediation strategy, this approach is considered acceptable to deal with any ground contamination.

A number of moderate adverse impacts have been identified relating to the construction phase. Many of these can be successfully mitigated through the adoption of high standards of health, safety, management and hygiene on the site and the use of best practice. A framework Construction Environmental Management Plan and Site Waste Management Plan have been developed which can be secured by appropriate conditions.

The most significant mitigation remediation measure to be adopted for the site is for the treatment on the site itself of all contaminated waste arising through the demolition of buildings and ground works. This approach has already been agreed for the construction of the Access Road and Link Road. This will take place within a 'soil hospital' where soil stabilisation will take place using cement and lime to make the waste geotechnically and geochemically suitable for use. This stabilised waste material will then be used to build the embankments required for the Access Road. In this way, all contamination on the site will be removed and treated and the residual waste reused, thus avoiding any need for the removal and disposal of waste off-site and also minimising the need to import additional materials. It is also proposed to treat all invasive species on site and a strategy for this is already being developed.

Following the implementation of the proposed mitigation measures, it is predicted that the overall impact of the development will be moderately beneficial, with ground sources having been removed and no risk to future users or the environment. The proposal will therefore accord with Policies SE24, SE25, SE26 and SE28 of the District Plan and Policy SD1 of the Core Strategy.

Archaeology and cultural heritage

An Historic Environment Desk-Based Assessment has been undertaken for a study area comprising the application site and a 500m buffer zone around the site. This assessment examines the known archaeology and built heritage within the study area as well as considering the potential for previously unrecorded archaeological remains. An archaeological walkover survey has also been undertaken together with the archaeological monitoring of geotechnical investigations within the site.

The application site contains one designated heritage asset, the grade II listed former Union Workhouse building, also known as 'I-Block', with the wider study area containing a further 11 listed buildings, mainly located along the High Street. There are a total of 85 previously recorded heritage assets within the study area which cover all periods from Prehistoric (to 43 AD) to Modern (1900 to present). The vast majority of these will not be

affected by the proposed development and were not considered further. Furthermore, eight assets that will be directly impacted by the approved Link Road and Access Road were assessed as part of the highways and infrastructure works application submitted for these works and will also not be considered further. Some sites could have their setting affected by the proposed development in which case those where setting contributes to their significance were considered within the assessment.

The 'I-Block' is located within the Existing Hospital development area and no works are proposed to this building as part of the masterplan. An Historic Building Appraisal has been undertaken for the building (December 2013) and this can be used to inform any future changes to the use of the building.

Only two assets will be impacted by the masterplan proposals (in addition to those already identified as part of the highways and infrastructure works application). These are the former chapel sited to the south-west of the 'I-Block' and a former gravel pit located underneath the main access road close to Vicarage Road. There are no visible remains of the chapel building but there is potential for subsurface remains to still be present which would be lost, partially or fully, as a result of construction activities. A similar situation exists with the gravel pit. In both cases, an archaeological watching brief is recommended.

An archaeological watching brief is also recommended for all other areas during construction. Overall, with mitigation in place, the impact of the proposals is considered to be neutral.

Air quality

Previous assessments of local air quality by the Council have identified concerns with two air pollutants within the Borough. These are NO₂ (nitrogen dioxide) and PM₁₀ (particulate matter). NO₂ is produced by all combustion processes, and as such, road transport is a key emitter of this pollutant. Particulate matter is composed of a wide range of materials arising from a variety of sources. PM₁₀ is the particle size that has been adopted by European air quality standards as the standard for the assessment of fine particular

matter. Air quality monitoring is undertaken within the Borough at 18 sites providing a measure of annual mean concentrations of NO₂. This has led to the designation of a number of Air Quality Management Areas (AQMAs) across the Borough, with four located close to the application site: two at the Vicarage Road/Hornets junction to the north of the site and two at Chalk Hill/Aldenham Road to the east of the site.

An operational phase assessment was undertaken in accordance with the methodology outlined in the Design Manual for Roads and Bridges (published by the Highways Agency). Annual mean concentrations of NO₂ and PM₁₀ were modelled at 30 discrete receptors representing the closest building façades to those roads where the proposed development would cause a change in traffic flows. Results for predicted concentrations of NO₂ show that the overall the significance of the scheme on air quality is considered to be negligible. Furthermore, the modelling has shown that there are only negligible differences in concentrations at all receptors between the previously approved masterplan and the current masterplan, both with and without the Farm Terrace Allotment site.

It is a similar situation in respect of PM₁₀ concentrations, with the overall significance of the impact of the proposed development on annual and daily mean PM₁₀ concentrations also considered to be negligible.

The construction phase of the proposed development has the potential to generate emissions of dust and PM₁₀ within the boundaries of the construction areas. Whilst the majority of this dust would be contained within the boundaries, some will be transported in the air to sites outside the construction areas, potentially giving rise to short-term adverse impacts.

No mitigation measures are proposed for the operational phase of the proposed development, with predicted NO₂ and PM₁₀ contributions considered negligible. There are a number of mitigation measures that can be employed to lessen the nuisance and human-health impacts of the dust and PM₁₀ generated during construction activities. Such measures include those relating to communication with receptors, site management and

maintenance, dust monitoring, waste management, and best practices relating to all construction activities. These measures have been included in the framework Construction Environmental Management Plan which can be secured by condition.

No residual impacts are anticipated from construction phase impacts, with dust concentrations/deposition rates returning to their existing levels once the construction of the proposed development is complete. During the operation phase of the masterplan, NO₂ and PM₁₀ concentrations are predicted to be within the relevant Air Quality Strategy objective levels. The proposal therefore accords with Policy SE20 of the District Plan.

Noise

A baseline noise survey was carried out in January 2014 in order to determine the ambient noise within the study area from road traffic and other sources and to update the previous survey undertaken in 2013. This allows comparison with the predicted noise levels from the completed development. Noise monitoring was undertaken at six noise sensitive receptors within the vicinity of the site, four of which were residential properties, one industrial and one the existing hospital. The modelling undertaken considered the potential impacts on these noise sensitive receptors in relation to:

- Predicted noise levels from construction works.
- Noise from building services plant associated with the proposed development during operation.
- Any increases to road traffic attributed to the development.

The modelling predicts temporary impacts of 'negligible' to 'moderately adverse' during the construction phase which would be expected during major construction works of this nature. These impacts will not be continuous during the various construction phases and represent worst case scenarios. No specific noise mitigation measures are proposed for the construction phase although a framework Construction Environmental Management Plan has been submitted that contains measures to minimise noise through good working practices. Impacts can also be controlled through appropriate hours of working.

For the operational phase, it is concluded that good internal ambient noise levels for the future occupiers of the development, in accordance with BS 4142, can be achieved through the use of appropriate construction methods and double glazing/ventilation systems. Furthermore, any plant or equipment to be installed on buildings can also be attenuated to appropriate levels to achieve a level of -10dB(A) for the difference between rating and background level. This will ensure the plant/equipment will not give rise to a cumulative rise in background noise levels.

Waste

The types and volumes of waste likely to be generated through the construction phases and operational phases of the masterplan, for both the detailed element and the outline element, have been predicted. The majority of the construction waste will be inert or non-hazardous comprising soils, bricks and timber. It is intended that any hazardous waste will be treated as part of the highways infrastructure works and will be treated and stabilised in soil hospitals within the site. This approach has already been approved by the Environment Agency. It is predicted that 73% of construction waste from the detailed element and 82% of construction waste from the outline element will be recovered and recycled or re-used on-site. A design stage Site Waste Management Plan (SWMP) has been prepared as part of the application to promote resource efficiency and waste minimisation and this will form the basis for detailed SWMPs for each phase of development.

Operational waste will be generated by the various residential and commercial uses within the site and each phase of development will need to ensure adequate facilities are provided for waste and recycling bins and their collection. This will need to be secured at detailed stage.

The securing of a detailed SWMP for each development phase and waste/recycling facilities at detailed stage will ensure the proposal complies with the objectives of Policies SD1 and SD4 of the Core Strategy, Policy SE7 of the Watford District Plan and Waste

Policy 5 of the County Council's Waste Core Strategy and Development Management Policies DPD.

The County Council, as Waste and Mineral Planning Authority, has also made comments in relation to existing waste facilities within the site, referring to the metal recycling facility at Cardiff Road Industrial Estate and the temporary concrete crushing facility at Wiggshall Road. This latter facility was for a temporary period only, was not lawfully implemented and has since ceased operations. The comments also refer to the waste transfer station at Wiggshall Depot but it should be noted that this facility was closed by the County Council several years ago and the site is not, in any event, within the masterplan area. These sites are safeguarded under Waste Policy 5: Safeguarded Sites. This policy aims to safeguard existing sites that contain waste management facilities and states that the County Council will oppose development proposals that are likely to prevent or prejudice the use of these sites for waste management purposes. The weakness in this policy is that the County Council has no powers to prevent existing waste management sites from being lost. This could occur for a wide variety of legitimate reasons; through leases coming to an end or being terminated, existing operators moving sites, or operators closing down for financial or other reasons. Furthermore, Policy SPA3 of the Core Strategy does not include the provision of waste management facilities as part of the Health Campus, so the retention of these uses would be in conflict with this policy. Such uses would also be likely to cause significant conflict with other proposed uses.

Sewerage infrastructure

The consultation response from Thames Water refers to the inability of the existing sewer system to accommodate the requirements of the proposed masterplan. As a consequence, it is suggested that the proposed level of development will lead to sewage flooding occurring. It is not known what this shortfall in capacity is or what works will be required in order to address this issue. Thames Water has requested a drainage strategy be developed, incorporating any on or off-site drainage works to be undertaken, in order to ensure adequate capacity within the sewer system. It has also requested that no development should commence until a drainage strategy has been approved and that no

discharges shall take place into the sewer system until any additional works have been undertaken. The applicants are currently undertaking a survey of the existing sewers across the site in conjunction with Thames Water and this may reveal an existing capacity to serve some of the masterplan development before further improvement works are required. However, it is not currently known what level of additional capacity will be required, how this will be funded or the timescale for the works to be undertaken.

Planning obligation

The development proposed in this application is one where, in accordance with Policy INF1 of the Core Strategy, the Council will normally require the applicant to enter into a planning obligation to provide contributions towards the provision or improvement of community facilities and infrastructure. Under Regulation 122 of the Community Infrastructure Levy Regulations 2010, where a decision is made which results in planning permission being granted for development, a planning obligation may only constitute a reason for granting planning permission for that development if the obligation is:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

Policies T3, T4, T5 and INF1 of the Watford Local Plan Core Strategy and saved policies L8, L9 and H10 of the Watford District Plan 2000, together with *SPG 10: Open Space Provision*, provide the policy basis for financial contributions towards improved services and facilities within the Borough. The application of these policies ensures that all applicants make payments in proportion to the additional demand on services and facilities that their development will generate.

The Council's approach to seeking financial contributions by means of a planning obligation is fully in accordance with the advice set out in paragraphs 203 to 205 of the National Planning Policy Framework. In each case, the contributions received are pooled together in order to accumulate sufficient funds for the Council and the County Council to

undertake capital works within the Borough. Given the small size of the Borough, this is considered to be a reasonable and acceptable approach to the provision of new or improved services and facilities and accords with paragraphs 203 to 205 of the National Planning Policy Framework.

The contributions in the case of the development proposed in this application will be calculated in accordance with the County Council's Planning Obligations Toolkit (adopted January 2008) and the relevant saved policies of the Watford District Plan 2000 and/or will be negotiated separately to meet the specific demands arising from the development. In some cases, the financial contribution may reflect the partial provision of facilities on-site. This ensures that the contributions are directly related to the proposed development, are fairly and reasonably related in scale and kind to that development and are necessary to make the development acceptable in relation to those policies. Accordingly, the requirement for such contributions meets the tests in Regulation 122 of the Community Infrastructure Regulations 2010, and, consequently, the planning obligation can be taken into account as a material planning consideration in the determination of the application.

As that part of the application which contains the proposed residential development has been submitted in outline, the financial contributions cannot be calculated at this stage as they are dependent upon the number and size of units that will be developed.

In addition to the financial contributions in respect of the proposed residential development, it is intended that the planning obligation should also cover the following matters:

- the upgrading of the traffic signal controller at Junction 5 of the M1;
- junction improvements at the Lower High Street/Dalton Way junction;
- the implementation of the Framework Travel Plan;
- the implementation of a car parking management strategy;
- the provision of fire hydrants to serve the development;
- an affordable housing strategy for the delivery of 35% of the new dwellings as affordable housing;

- the removal of river structures within the River Colne and the side channel and a masterplan for the River Colne within the site and off-site;
- biodiversity off-setting and ecological improvements within the River Colne corridor;
- the improvement and upgrading of sewer capacity either on-site or off-site to serve the development.

Conclusion

Planning applications must be determined having regard to the provisions of the development plan and to any other material planning considerations. At the outset, there is a presumption in favour of the proposals, in the light of the provisions of Policy SPA3 of the Core Strategy, which is a key component of the development plan for Watford.

Nevertheless, a proposal of this scale inevitably raises many issues; although most of these have been satisfactorily addressed, as set out in this report, there are a number of outstanding matters where more work is required. Of particular significance are matters relating to the provision of education facilities, particularly at early years, nursery and primary level; how the adverse impacts of the development on ecology and biodiversity are to be mitigated, particularly within the River Colne and its valley; the extent to which the development is able to provide adequate and high quality open space and green infrastructure within the site; and the adequacy of the sewerage infrastructure to serve the proposed level of development.

It is necessary to bear in mind that this is largely an outline application and that some of the outstanding issues can be dealt with at the subsequent detailed stages, subject to the establishment of appropriate parameters at the outline stage. Others can be controlled by the use of planning conditions or by means of a planning obligation. However, some aspects do need to be clearly defined before outline planning permission can be granted.

Bearing in mind the scale of the proposals and the complexities presented by the site, it is inevitable that some compromises will need to be made. In particular, this may mean that not all policy requirements can necessarily be met as part of the scheme (e.g. a combined

heat and power plant to serve the development). Equally, there may be some parts of the scheme that are less than satisfactory (e.g. the proposed multi-storey car park for hospital staff within the Cardiff Road development area). It is necessary, therefore, to decide how much weight should be attributed to the various material planning considerations (in addition to the provisions of the development plan), both those that point in favour of a grant of planning permission and those that do not, so that, overall, a balance can be struck between the various competing arguments. On completion of this balancing exercise, a decision can then be reached as to whether, overall, planning permission should be granted.

The development of a new Health Campus at the site has been a long term strategic objective of the Council that is enshrined in Policy SPA3 of the Core Strategy. The current masterplan is an evolution of the previously approved masterplan granted in 2010 and has been formulated to accommodate the changing circumstances of Watford General Hospital. Whilst the needs of the hospital are not known at the present time, nevertheless, the masterplan achieves many of the key aims and objectives of Policy SPA3. It will redevelop significant areas of degraded brownfield land, safeguard land for the future expansion and improvement of Watford General Hospital and deliver a major new, mixed use urban quarter within west Watford. It will also deliver a new access road to serve the hospital and the wider masterplan site, previously approved in December 2013. Although, with the exception of Business Zone South, the details of the masterplan are not known, there is no planning reason why a successful, high quality development cannot be achieved at reserved matters stage. With regard to the significant outstanding matters, these are all capable of a satisfactory resolution but this will require the agreement of the applicant. They are, however, fundamental to the acceptability of the application in planning terms. The failure of the applicant to reach a satisfactory resolution to each of these matters is likely to be fatal to the application. On balance, therefore, it is considered that the application can be recommended for approval subject to these various outstanding matters being satisfactorily resolved.

HUMAN RIGHTS IMPLICATIONS

The grant of planning permission subject to the completion of a s.106 legal agreement and appropriate conditions will have an adverse impact on the human rights of the applicants to develop and use their land. This impact is considered justified in order to protect the human rights of third parties to use their land or enjoy their homes and in the wider public interest.

RECOMMENDATIONS

- (A)** That planning permission be granted subject to the completion of a planning obligation under s.106 of the Town and Country Planning Act 1990 in accordance with the Heads of Terms set out in (B) below and to the imposition of appropriate planning conditions as referred to in (C) below.
- (B)** That the Development Management Section Head be authorised to negotiate the detailed wording of the following Heads of Terms:
- (i) financial contributions payable to the County Council towards traffic calming measures on roads surrounding the site, the enhancement of public transport infrastructure and the enhancement of bus services serving the site;
 - (ii) financial contributions payable to the Council towards the implementation of extensions to the existing Controlled Parking Zones and the improvement of cycleways and footways within 2000m of the boundaries of the site;
 - (iii) the upgrading of the traffic signal controller at Junction 5 of the M1;
 - (iv) junction improvements at the Lower High Street/Dalton Way junction;
 - (v) the implementation of the Framework Travel Plan;
 - (vi) the implementation of a car parking management strategy;
 - (vii) the provision or improvement either on-site and/or off-site by means of either direct provision and/or financial contributions payable to the County Council

towards facilities for secondary education, primary education, nursery education, childcare, youth and libraries;

- (viii) the provision of fire hydrants to serve the development;
 - (ix) an affordable housing strategy for the delivery of 35% of the new dwellings as affordable housing;
 - (x) financial contributions payable to the Council towards the provision or improvement of open space;
 - (xi) the removal of river structures within the River Colne and the side channel and a masterplan for the River Colne within the site and off-site;
 - (xii) biodiversity off-setting and ecological improvements within the River Colne corridor;
 - (xiii) the improvement and upgrading of sewer capacity either on-site or off-site to serve the development.
- (C) That the planning permission be subject to conditions, including the following:
- (i) in respect of the outline element, the conditions referred to in Annex A; and
 - (ii) in respect of the detailed element, the conditions referred to in Annex B.
- (D) That the final text of the planning obligation and the planning conditions be determined by the Development Management Section Head in consultation with the Chair of the Development Control Committee and the Planning Portfolio Holder for the time being.

Informatives

1. This planning permission is accompanied by an agreement under Section 106 of the Town and Country Planning Act 1990 to secure financial payments towards the provision or improvement of public open space, childcare, education, youth facilities, library facilities and sustainable transport measures for the Borough of Watford; the provision of affordable housing; and the provision of any fire hydrants

that are necessary to serve the development, in accordance with the provisions of Supplementary Planning Guidance 10 (SPG10), Policies L8 and H10 of the Watford District Plan 2000 and Policies T4, T5 and INF1 of the Watford Local Plan Core Strategy 2006-31. In addition, the legal agreement secures a contribution towards the variation of the Borough of Watford (Watford Central Area and West Watford Area) (Controlled Parking Zones) (Consolidation) Order 2010 to exclude future residents of the development from entitlement to resident parking permits for the controlled parking zones in the vicinity of the site, in accordance with Policy T24 of the Watford District Plan 2000. The planning obligation also includes provisions relating to the provision of 35% affordable housing and an affordable housing delivery strategy; traffic signal improvements at M1 J5; a package of transport measures including alterations to the Lower High Street/Dalton way junction; the implementation of a travel plan; the implementation of a car parking management strategy; improvements to the River Colne and biodiversity off-setting measures within the River Colne valley; and improvement and upgrading of sewer capacity to serve the development.

2. For the avoidance of doubt, site preparation works shall not include the removal of trees and shrubs from the site or works comprising the erection of site hoarding for security and safety reasons.
3. All species of bat are European Protected Species. A licence is required in order to carry out any works that involve certain activities such as capturing the animals, disturbance, or damaging or destroying their resting or breeding places. Note that damage or destruction of a breeding site or resting place is an absolute offence and unless the offences can be avoided through avoidance (e.g. by timing the works appropriately), it should be licensed. In the first instance it is for the developer to decide whether a species licence will be needed. The developer may need to engage specialist advice in making this decision. A licence may be needed to carry out mitigation work as well as for impacts directly connected with a development.

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ANNEX A

Watford Health Campus – 14/00511/OUTM

Hybrid planning application for the development of a mixed-use health campus

Schedule of conditions

Outline Element

Masterplan for each Development Area

1. No reserved matters shall be submitted for any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' until a masterplan for the development area showing the following details has been submitted to and approved in writing by the Local Planning Authority:
 - i) Vehicle routes including access to parking areas, servicing of buildings, and emergency vehicles;
 - ii) Pedestrian and cycle routes;
 - iii) Maximum building footprints;
 - iv) Active building frontages;
 - v) Location and size of green open space and hard landscaped open space;
 - vi) Location and size of children's play facilities;
 - vii) Linkages to adjoining development areas.

Reason: To ensure the proper planning of each development area and appropriate relationships to adjoining areas.

Phasing Plan for each Development Area

2. No reserved matters shall be submitted for any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' until a phasing plan showing how the development within the relevant development area will be phased and implemented has been submitted to and approved in writing by the Local Planning Authority. The phasing plan shall delineate each separate phase of development and provide details of start and indicative completion dates. Phase boundaries shall be contiguous with each other. For the avoidance of doubt, the phasing plan for the Riverside development area shall include the creation of the Colne Island open space and Ebury Way Link as approved under planning permission ref. 13/00971/FULM. The development shall only be carried out in accordance with the approved phasing plan, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the development is carried out in an appropriate sequence within each development area in the interests of proper planning.

Reserved Matters

3. No development shall commence within any phase of development within any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' until details of the reserved matters of access, appearance, landscaping, layout and scale for the relevant phase have been submitted to and approved in writing by the Local Planning Authority. The development shall only be implemented in accordance with the approved details.

Reason: To comply with the provisions of Article 3(1) of the Town and Country Planning (General Development Procedure) Order 1995.

Time Limit

4. Applications for approval of the reserved matters must be made not later than the expiration of ten years from the date of this permission.

Reason: To prevent the accumulation of unimplemented planning permissions, to enable the Local Planning Authority to review the suitability of the development in the light of altered circumstances and to comply with the provisions of Section 92(2) of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

Approved Drawings

5. The reserved matters applications pursuant to this permission shall be made in accordance with the following approved drawings and substantially in accordance with the supporting documents:-

Parameter Plan: Development Areas and Land Uses – drawing no. A10336D0010 rev.P3

Parameter Plan: Pedestrian and Green Links – drawing no. A10336D0012 rev.P3

Parameter Plan: Vehicular Access – drawing no. A10336D0013 rev.P3

Parameter Plan: Maximum Building Heights – drawing no. A10336D0014 rev.P1

Parameter Sections: East-West Sections – drawing no. A10336D0015 rev.P2

Parameter Plan: North-South Sections West Side – drawing no. A10336D0016 rev.P2

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

Hours of Construction

6. Construction of the development hereby permitted shall not take place before 8am or after 6pm Mondays to Fridays, before 8am or after 1pm on Saturdays and not at all on Sundays and Public Holidays, unless otherwise agreed in writing by the Local Planning Authority.

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

Construction Environmental Management Plan

7. No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence within any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' until a Construction Environmental Management Plan (based upon the Environmental Management Plan dated 31st March 2014 in the Environmental Statement) has been submitted to and approved in writing by the Local Planning Authority. This Plan shall include (but not exclusively) details of the operation of the Considerate Contractors Scheme; a contact procedure for complaints; the routing of construction vehicles; the management of deliveries to avoid peak times; the management of contractors parking; hours of noisy operation; hours for deliveries; air, noise and dust monitoring around the boundaries of site; the siting and demarcation of compounds within the site; the siting and type of fencing to protect all trees, hedges and habitats to be retained and all watercourses; safe access to site offices; and wheel washing facilities at all exits from the site. The Plan as approved shall be implemented throughout the period of works unless otherwise agreed in writing by the Local Planning Authority.

Reason: To minimise the impacts of site preparation and construction activities on surrounding properties, the local environment and the local highway network during the time the development is being undertaken.

Land Contamination

8. No development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and

service diversions) or construction shall commence within any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' until a scheme that includes the following components to deal with the risks associated with contamination of the relevant development area has been submitted to and approved in writing, by the Local Planning Authority:

- 1) A preliminary risk assessment which has identified:
 - all previous uses
 - potential contaminants associated with those uses
 - a conceptual model of the site indicating sources, pathways and receptors
 - potentially unacceptable risks arising from contamination at the site.

- 2) A site investigation scheme, based on (1), to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

- 3) The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

- 4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To protect the quality of the water environment, in accordance with Policies SE24, SE26 and SE28 of the Watford District Plan 2000 and Policy SD1 of the Watford Local Plan Core Strategy 2006-31.

8. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason: To protect the water environment, in accordance with Policies SE24, SE26 and SE28 of the Watford District Plan 2000 and Policy SD1 of the Watford Local Plan Core Strategy 2006-31.

9. No occupation of any building within any phase of the development (or such other date or stage in development as may be agreed in writing with the Local Planning Authority) shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation has been submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason: To protect the water environment by ensuring the remedial work for each phase of the development is complete and has been successful, in accordance with Policies SE24, SE26 and SE28 of the Watford District Plan 2000 and Policy SD1 of the Watford Local Plan Core Strategy 2006-31.

Archaeological investigation

10. (i) No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence within any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' until an Archaeological Written Scheme of Investigation for the relevant development area has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include an assessment of archaeological significance and research questions and:
1. the programme and methodology of site investigation and recording;
 2. the programme and methodology of site investigation and recording as suggested by the archaeological evaluation;
 3. the programme for post investigation assessment;
 4. provision to be made for analysis of the site investigation and recording;
 5. provision to be made for publication and dissemination of the analysis and records of the site investigation;
 6. provision to be made for archive deposition of the analysis and records of the site investigation;
 7. nomination of a competent person or persons/organisation to undertake the works set out within the Archaeological Written Scheme of Investigation.
- (ii) The development shall only be undertaken in accordance with the programme of archaeological works set out in the Written Scheme of Investigation approved under part (i).
- (iii) No occupation of any building within any development area shall take place until the site investigation and post investigation assessment has been

completed in accordance with the programme set out in the Written Scheme of Investigation approved under part (i) and the provision made for analysis and publication where appropriate.

Reason: To ensure that any archaeological remains on the site can be evaluated and recorded, in accordance with Policy UD2 of the Watford Local Plan Core Strategy 2006-31.

Site Waste Management Plan

11. No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence within any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' until a Site Waste Management Plan (SWMP) (based upon the Design Stage SWMP dated 28th March 2014 in the Environmental Statement) for all aspects of waste management during site preparation and construction has been submitted to and approved in writing to the Local Planning Authority. The development shall be undertaken in accordance with the agreed Plan unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure measures are in place to minimise waste generation and maximise the on-site and off-site reuse and recycling of waste materials, in accordance with Policy SD4 of the Watford Local Plan Core Strategy 2006-31.

Flood Risk

12. No works of development shall commence within any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' until a scheme to address flood risk has been submitted to and approved in writing by the Local Planning Authority. The scheme must be in accordance with the approved Flood Risk Assessment (FRA) prepared by AECOM

dated March 2014. The scheme must include the following mitigation measures detailed within the FRA:

1. The surface water drainage scheme for the site shall be based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development. The drainage strategy should demonstrate the surface water run-off generated up to and including the 100 year critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event. Details of how the scheme shall be maintained and managed after completion must be included.
2. Finished floor levels are set no lower than the 1 in 1000 year flood event design level.
3. Flood compensation works as determined by any buildings encroaching into the 100 year climate change design level.
4. Resilience measures as indicated to direct flood flows away from buildings by land shaping.
5. Providing safe dry access/egress to higher ground from any buildings within the 100 year climate change flood envelope.

Reason: To prevent an additional risk of flooding on site and elsewhere by ensuring that compensatory storage of flood water is provided, in accordance with paragraph 102 of the National Planning Policy Framework and Policy SD2 Watford Local Plan Core Strategy 2006-31.

Built Footprint within Floodplain

13. No built footprint shall be constructed within the 100 year climate change baseline flood envelope with the Tributary flows and updated topographic survey data

included (see drawing 60288684-INF-SK14 Rev 3.0 in Appendix 2 of the Flood Risk Assessment prepared by AECOM dated March 2014) until after the works to open up and improve the flow capacity of the Wigenhall Tributary Ditch have been completed and the completion of these tributary works has been demonstrated in writing to and been approved by the Local Planning Authority.

Reason: To ensure that flood risk is not increased on the site and to the surrounding areas.

Bridge Design

14. The design of any new bridge over a designated 'main river' watercourse shall be submitted to and approved in writing by the Local Planning Authority. The details shall demonstrate that the bridge is free-spanning over the watercourse with the abutments set back a minimum of one metre from the top of the riverbank on the landward side and with a soffit level in excess of the 100 year climate change level with an appropriate freeboard. Any new bridge shall only be constructed in accordance with the approved details.

Reason: To ensure that any new bridge does not increase the risk of flooding on the site or to the surrounding area.

Surface Water Drainage

15. No infiltration of surface water drainage into the ground shall take place other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reason: To protect the quality of the water environment, which is extremely sensitive beneath this site. Using soakaways or other infiltration methods on contaminated land carries groundwater pollution risks and may not work in areas with a high water table.

Piling

16. Piling or any other foundation designs using penetrative methods shall not take place other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: To protect the quality of the water environment, which is extremely sensitive beneath this site. Some of the buildings' foundations may be partially below the water table and piling/foundation construction activities may disturb contamination, causing it to migrate into the groundwater.

Non Native Invasive Species Strategy

17. No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence until a detailed method statement for the removal or long-term management/control of Japanese Knotweed and Himalayan Balsam has been submitted to and approved in writing by the Local Planning Authority. The method statement shall include proposed measures that will be used to prevent the spread of Japanese Knotweed and Himalayan Balsam during any operations e.g. mowing, strimming or soil movement. It shall also contain measures to ensure that any soils brought to the site are free of the seeds/root/stem of any invasive plant covered under the Wildlife and Countryside Act 1981, as amended. Development shall only be carried out in accordance with the approved method statement.

Reason: To prevent the spread of Japanese Knotweed and Himalayan Balsam, which are invasive non-native species found throughout the site, and pose a long term risk to biodiversity if they are not controlled, in accordance with Policy GI2 of the Watford Local Plan Core Strategy Policy 2006-31.

Services Strategy

18. No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence within any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' until a Services Strategy, setting out all existing services in the relevant development area to be removed or diverted and all new services to be provided, has been submitted to and approved in writing by the Local Planning Authority. The development shall be implemented accordance with the approved Strategy unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure these works do not have any adverse impacts on the local environment.

Sustainability Targets

19. All non-residential units within the development hereby permitted shall be constructed to achieve a minimum rating of 'Very Good' in accordance with the relevant BREEAM standard for the proposed uses(s) (or the equivalent standard in such measure of sustainability for design which may replace that scheme).

No development shall commence within any phase of development within any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' until an Interim (Design Stage) Certificate issued by or on behalf of the British Research Establishment to demonstrate that the shell and core design of the non-residential buildings or the non-residential elements of mixed-use buildings within the relevant phase will achieve a minimum BREEAM rating of 'Very Good' has been submitted to and approved by the Local Planning Authority. This shall be supplemented by details of any measures that would need to be secured by the tenant fit out and a mechanism by which these will be secured. No non-residential unit shall be occupied until a

Post-Completion Final Certificate, to certify that the rating of 'Very Good' has been achieved, has been submitted to and approved in writing by the Local Planning Authority.

Reason: To accord with Policies SD1, SD2 and SD3 of the Watford Local Plan Core Strategy 2013.

20. All residential units (Use Class C3) within the development hereby permitted shall be constructed to achieve a minimum of Code Level 4 in accordance with the Code for Sustainable Homes (or the equivalent standard in such measure of sustainability for house design which may replace that scheme).
- i) No residential development shall commence within each phase of each development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' until a design stage interim certificate issued by or on behalf of the British Research Establishment to demonstrate how the residential dwellings within the relevant phase will achieve a minimum of Code Level 4 has been submitted to and approved in writing by the Local Planning Authority.
 - ii) No later than 4 months after the first occupation of each building, the Final Code Certificate certifying that a minimum of Code Level 4 has been achieved for each of the dwellings within the building shall be submitted to the Local Planning Authority.

Tree and shrub removal

21. No trees, scrub or hedges within any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' shall be lopped, topped, felled, grubbed up or otherwise removed from the site between 1st March and 31st August in any year unless a suitably qualified ecologist has previously surveyed the trees, scrub or hedges and certified in writing

to the Local Planning Authority that such works of removal will not harm nesting birds or any protected species.

Reason: To prevent harm to nesting birds and other protected species during the breeding season.

Tree Protection Measures

22. No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence until the fencing to protect all trees, hedges and habitats to be retained and all watercourses as approved as part of the Construction Environmental Management Plan (Condition 7) has been erected on the site. No works shall take place within the protected areas until a method statement detailing the works to be undertaken and the methods to be used have been submitted to and approved in writing by the Local Planning Authority. Works within the protected areas shall only be undertaken in accordance with the approved method statement.

Reason: To safeguard the health and long term retention of the existing trees, shrubs and hedges on the site which represent an important visual and ecological asset within the River Colne corridor.

Existing and Proposed Ground Levels

23. No development shall commence within any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' until details of the existing and proposed ground levels and the finished ground floor levels of all the buildings, roads and footpaths within the relevant development area have been submitted to and approved in writing by the Local Planning Authority. The development shall only be constructed in accordance with the approved details.

Reason: To ensure an acceptable relationship between the proposed building and the adjoining highway and surrounding buildings.

Soft Landscaping Scheme

24. No building within any phase of development within any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' shall be occupied until the following details have been submitted to and approved in writing by the Local Planning Authority:

- i) A landscape management plan for the long term maintenance of all soft landscaping and biodiversity measures within the site.
- ii) A phasing plan for the implementation of the soft landscaping scheme.

The soft landscaping scheme shall only be implemented in accordance with the approved details and shall be maintained in accordance with the approved management plan at all times, unless otherwise agreed in writing by the Local Planning Authority.

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

External Lighting

25. No development shall commence until full details of the siting, height, design and type of all external lighting and details of ground lux levels have been submitted to and approved in writing by the Local Planning Authority. The lighting shall be designed to minimise any light spillage towards the River Colne and to minimise any adverse impacts on wildlife. The external lighting shall only be installed in accordance with the approved details.

Reason: To ensure light pollution is minimised in the interests of the River Colne and local ecology and the visual impact of the development, in accordance with Policies GI3 and UD1 of the Watford Local Plan Core Strategy 2006-31.

Access

26. No building within any phase of any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' shall be occupied until all access measures approved as reserved matters have been completed in full for the relevant phase.

Reason: To ensure safe and adequate vehicular and pedestrian access to the development and in the interests of highway safety, in accordance with Policy T4 of the Watford Local Plan Core Strategy 2006-31.

Car Parking Provision

27. No development shall commence within any phase of any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' until the following details have been submitted to and approved in writing by the Local Planning Authority:

- i) The location and layout of car parking spaces including spaces for people with disabilities.
- ii) The allocation of car parking spaces including spaces for visitors.
- iii) Details of on-site parking controls and charges.
- iv) A management plan for the enforcement of parking controls and charges.
- v) The provision and location of charging points for electric vehicles.

No building shall be occupied within any phase until the approved car parking measures relevant to that phase have been provided in full, unless otherwise approved in writing by the Local Planning Authority. The spaces shall be retained at all times for the parking cars.

Reason: To ensure adequate parking facilities are provided on the site and to minimise any additional on-street car parking, in accordance with saved Policies T22 and T24 of the Watford District Plan 2000.

Cycle Parking Provision

28. No development shall commence within any phase of any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' until the following details have been submitted to and approved in writing by the Local Planning Authority:

- i) The location and size of secure and weatherproof cycle stores for residential and non-residential use.
- ii) The number of cycles to be accommodated in each store and the type of racking system to be used.
- iii) The residential flats and non-residential floorspace respectively served by each store.
- iv) The number, type and location of cycle stands for general public use.

No building shall be occupied within any phase until the approved cycle parking measures relevant to that phase have been provided in full, unless otherwise approved in writing by the Local Planning Authority. The cycle stores shall be retained at all times for the parking of cycles and shall not be used for any other purpose.

Reason: To ensure adequate facilities are provided for the occupiers of the site and in the interests of the visual appearance of the site and its impact on the street scene and character of the surrounding area, in accordance with Policies SD1 and UD1 of the Watford Local Plan Core Strategy 2006-31 and saved Policies T10 and T21 of the Watford District Plan 2000.

Bin Storage Provision

29. No development shall commence within any phase of any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' until the following details have been submitted to and approved in writing by the Local Planning Authority:

- i) The location and size of secure and weatherproof bin stores for residential and non-residential use.
- ii) The number and size of bins for waste, dry recycling and green waste to be accommodated in each store.
- iii) The residential flats and non-residential floorspace respectively served by each store.
- iv) Details of collection routes, collection points and any other collection arrangements, as appropriate, for the emptying of bins.
- iv) Details of access routes, turning and manoeuvring space for refuse vehicles.

No building shall be occupied within any phase until the approved bin stores relevant to that phase have been provided in full, unless otherwise approved in writing by the Local Planning Authority. The bin stores shall be retained at all times for the storage of bins and shall not be used for any other purpose.

Reason: To ensure adequate facilities are provided for the occupiers of the site and in the interests of the visual appearance of the site and its impact on the street scene and character of the surrounding area, in accordance with Policies SD1 and UD1 of the Watford Local Plan Core Strategy 2006-31 and saved Policy SE7 of the Watford District Plan 2000.

Plant and Equipment

30. No plant or equipment shall be installed externally on any building or within any plant room or enclosure or within the site of any phase of any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development

Areas and Land Uses' until full details have been submitted to and approved in writing by the Local Planning Authority. These details shall include the type, size and design of the plant/equipment; its siting and height above ground level; measures to mitigate its visual impact; details of any noise or odours emitted by the plant/equipment; and measures to mitigate any impacts arising from noise or odours. All plant and equipment should achieve a noise level of -10dB(A) compared to background noise levels as recorded in the Environmental Statement. The plant/equipment shall only be installed in accordance with the approved details and shall be retained as such at all times.

Reason: In the interests of the residential occupiers of the site and the patients at the hospital.

Maximum Floorspace and Use

31. The maximum number of residential dwellings to be developed within the application site shall not exceed 681.

Reason: To accord with the impact assessments undertaken in the Environmental Statement.

32. The maximum number of residential dwellings within any development area shall not exceed the number shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses'.

Reason: To accord with the impact assessments undertaken in the Environmental Statement.

33. The maximum total gross external floorspace to be developed within the application site shall not exceed 104,449m² and the maximum gross external floorspace by use shall not exceed the following amounts:

Hospital (Class C2) - 25,960m²

Offices/laboratories (Class B1(a) and B1(b)) - 3,685m²

Retail/commercial (Classes A1-A5) - 5,620m²

Residential (Class C3) - 55,988m²

Hotel (Class C1) - 3,000m²

Business/commercial (Classes B1(c), B2 and B8) - 8,477m²

Leisure (Class D2) - 1,719m²

Reason: To accord with the impact assessments undertaken in the Environmental Statement.

34. The maximum gross external floorspace for each use within any development area shall not exceed the amount shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses'. The floorspace within any development area shall only be used for the uses specified and shall not be used for any other uses.

Reason: To accord with the impact assessments undertaken in the Environmental Statement.

Design Standards

35. All residential units (Use Class C3) within the development hereby permitted shall be designed in accordance with the standards and guidelines contained in the Council's adopted Residential Design Guide 2014 (or any subsequent revision of this document).

Reason: To ensure the units provide satisfactory levels of accommodation and amenity for the future occupiers.

Open Space and Children's Play Facilities

36. No development shall commence within any phase of any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' until details of the public open space and children's play facilities for the relevant area have been submitted to and approved in writing. The details shall include the following:

- (i) The location and size of public open space.
- (ii) Details of the fencing, seating, litter bins and landscaping of the public open space.
- (iii) The location and size of children's play space.
- (iv) Details of the fencing, seating, litter bins, landscaping and play equipment for the children's play areas.

No buildings shall be occupied within each phase until the open space and children's play facilities relevant to that phase have been provided in full in accordance with the approved details.

Reason: To ensure adequate provision is made for open space and children's play facilities to serve the future occupiers of the development.

Biodiversity measures

37. No works of development shall commence within any phase of any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' until details of measures to enhance the biodiversity of the development area have been submitted to and approved in writing by the Local Planning Authority. The range of measures to be considered should include green roofs, brown roofs, green walls, bird and bat boxes and habitat creation in addition to the planting of native species. The details shall also include a management plan for the maintenance of the approved measures. No

dwelling or unit shall be occupied until the approved measures have been installed as approved, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To enhance the biodiversity value of the site.

Travel Plan

38. No unit shall be occupied within any phase of any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' until a detailed Travel Plan based upon the Framework Travel Plan (March 2014) has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall be operated as approved at all times, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To promote alternative modes of transport to the private car and minimise impacts on the local highway network and the wider environment.

Shopfronts

39. No use of any unit within Classes A1, A2, A3, A4, A5 and D2 shall commence until details of the shopfront to the unit have been submitted to and approved in writing by the Local Planning Authority and the shopfront has been installed in accordance with the approved details.

Reason: In the interests of the character and appearance of the development.

Hours of Use

40. No use of any unit within Classes A4 and A5 shall take place before 0800 hours or after 2330 hours on any day.

Reason: In the interests of the residential occupiers of the site and the patients at the hospital.

Construction of Access Road

41. No dwelling or non-residential unit within any development area shall be occupied until the Access Road and bridge approved under planning permission ref. 13/00971/FULM have been completed in full.

Reason: To ensure adequate and safe access is available for vehicles, cyclists and pedestrians to each phase of the development.

Renewable Energy

42. No development shall commence within any phase of any development area as shown on drawing no. A10336D0010 rev.P3 entitled 'Parameter Plan: Development Areas and Land Uses' until details of the low or zero carbon energy technologies to be used within the relevant phase have been submitted to and approved in writing by the Local Planning Authority. The details shall include the location, size and appearance any external plant and equipment. The technologies shall be installed as approved.

Reason: To ensure adequate measures are in place to reduce carbon emissions from the development and in the interests of the character and appearance of the development.

Internal Noise Levels

43. No development shall commence on any residential unit until details of the measures to be used to achieve internal noise levels that do not exceed the guidance levels given for residential rooms in BS8233:2014 have been submitted to and approved in writing by the Local Planning Authority. These measures shall include wall construction, windows, glazing and ventilation. No residential unit shall be occupied until the approved measures have been installed.

Reason: In the interests of the residential occupiers of the site and the patients at the hospital.

Breakdown of floorspace for Class A units

44. Maximum floorspace for A1/A2/A3 and other 'retail' uses.

Maximum size of Class A units

45. Range of size of units.

ANNEX B

Watford Health Campus – 14/00511/OUTM

Hybrid planning application for the development of a mixed-use health campus

Schedule of conditions

Detailed Element **Business Area South**

The following conditions relate to the detailed element of the application for Business Zone South as shown on drawing no. 1567-TP-01.

Time Limit

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

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

Approved Drawings

2. The development hereby permitted shall be carried out in accordance with the following approved drawings:-

1567-TP-01, 02, 03, 04, 05

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

Hours of Construction

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

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

Construction Environmental Management Plan

4. No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence until a Construction Environmental Management Plan (based upon the Environmental Management Plan dated 31st March 2014 in the Environmental Statement) has been submitted to and approved in writing by the Local Planning Authority. This Plan shall include (but not exclusively) details of the operation of the Considerate Contractors Scheme; a contact procedure for complaints; the routing of construction vehicles; the management of deliveries to avoid peak times; the management of contractors parking; hours of noisy operation; hours for deliveries; air, noise and dust monitoring around the boundaries of site; the siting and demarcation of compounds within the site; the siting and type of fencing to protect all trees, hedges and habitats to be retained and all watercourses; safe access to site offices; and wheel washing facilities at all exits from the site. The Plan as approved shall be implemented throughout the period of works unless otherwise agreed in writing by the Local Planning Authority.

Reason: To minimise the impacts of site preparation and construction activities on surrounding properties, the local environment and the local highway network during the time the development is being undertaken.

Land Contamination

5. No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence until a scheme that includes the following components to deal with the risks associated with contamination of the site has been submitted to and approved in writing, by the Local Planning Authority:

(1) A preliminary risk assessment which has identified:

- all previous uses
- potential contaminants associated with those uses
- a conceptual model of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination at the site.

(2) A site investigation scheme, based on (1), to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

(3) The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

(4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To protect the quality of the water environment, in accordance with Policies SE24, SE26 and SE28 of the Watford District Plan 2000 and Policy SD1 of the Watford Local Plan Core Strategy 2006-31.

6. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason: To protect the water environment, in accordance with Policies SE24, SE26 and SE28 of the Watford District Plan 2000 and Policy SD1 of the Watford Local Plan Core Strategy 2006-31.

7. No occupation of any building (or such other date or stage in development as may be agreed in writing with the Local Planning Authority) shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation has been submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason: To protect the water environment by ensuring the remedial work for each phase of the development is complete and has been successful, in accordance with Policies SE24, SE26 and SE28 of the Watford District Plan 2000 and Policy SD1 of the Watford Local Plan Core Strategy 2006-31.

Archaeological investigation

8. (i) No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground

remediation and service diversions) or construction shall commence until an Archaeological Written Scheme of Investigation has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include an assessment of archaeological significance and research questions and:

1. the programme and methodology of site investigation and recording;
 2. the programme and methodology of site investigation and recording as suggested by the archaeological evaluation;
 3. the programme for post investigation assessment;
 4. provision to be made for analysis of the site investigation and recording;
 5. provision to be made for publication and dissemination of the analysis and records of the site investigation;
 6. provision to be made for archive deposition of the analysis and records of the site investigation;
 7. nomination of a competent person or persons/organisation to undertake the works set out within the Archaeological Written Scheme of Investigation.
- (ii) The demolition/development shall take place/commence in accordance with the programme of archaeological works set out in the Written Scheme of Investigation approved under condition 6(i).
- (iii) The development shall not be occupied/used until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition 6(i) and the provision made for analysis and publication where appropriate.

Reason: To ensure that any archaeological remains on the site can be evaluated and recorded, in accordance with Policy UD2 of the Watford Local Plan Core Strategy 2006-31.

Site Waste Management Plan

9. No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence until a Site Waste Management Plan (SWMP) (based upon the Design Stage SWMP dated 28th March 2014 in the Environmental Statement) for all aspects of waste management during site preparation and construction has been submitted to and approved in writing to the Local Planning Authority. The development shall be undertaken in accordance with the agreed Plan unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure measures are in place to minimise waste generation and maximise the on-site and off-site reuse and recycling of waste materials, in accordance with Policy SD4 of the Watford Local Plan Core Strategy 2006-31.

Flood Risk

10. No works of development shall commence until a scheme to address flood risk has been submitted to and approved in writing by the Local Planning Authority. The scheme must be in accordance with the approved Flood Risk Assessment (FRA) prepared by AECOM dated March 2014. The scheme must include the following mitigation measures detailed within the FRA:

1. The surface water drainage scheme for the site shall be based on sustainable drainage principles and an assessment of the hydrological and hydro-geological context of the development. The drainage strategy should demonstrate the surface water run-off generated up to and including the 100 year critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event. Details of how the scheme shall be maintained and managed after completion must be included.
2. Finished floor levels are set no lower than the 1 in 1000 year flood event design level.

3. Flood compensation works as determined by any buildings encroaching into the 100 year climate change design level.
4. Resilience measures as indicated to direct flood flows away from buildings by land shaping.
5. Providing safe dry access/egress to higher ground from any buildings within the 100 year climate change flood envelope.

Reason: To prevent an additional risk of flooding on site and elsewhere by ensuring that compensatory storage of flood water is provided, in accordance with paragraph 102 of the National Planning Policy Framework and Policy SD2 Watford Local Plan Core Strategy 2006-31.

Built Footprint within Floodplain

11. No built footprint shall be constructed within the 100 year climate change baseline flood envelope with the Tributary flows and updated topographic survey data included (see drawing 60288684-INF-SK14 Rev 3.0 in Appendix 2 of the Flood Risk Assessment prepared by AECOM dated March 2014) until after the works to open up and improve the flow capacity of the Wighenhall Tributary Ditch have been completed. Completion of these tributary works must be demonstrated to and approved by the Local Planning Authority.

Reason: To ensure that flood risk is not increased on the site and to the surrounding areas.

Surface Water Drainage

12. No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for

those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reason: To protect the quality of the water environment, which is extremely sensitive beneath this site. Using soakaways or other infiltration methods on contaminated land carries groundwater pollution risks and may not work in areas with a high water table.

Piling

13. Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: To protect the quality of the water environment, which is extremely sensitive beneath this site. Some of the buildings' foundations may be partially below the water table and piling/foundation construction activities may disturb contamination, causing it to migrate into the groundwater.

Non Native Invasive Species Strategy

14. No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence until a detailed method statement for the removal or long-term management/control of Japanese Knotweed and Himalayan Balsam has been submitted to and approved in writing by the Local Planning Authority. The method statement shall include proposed measures that will be used to prevent the spread of Japanese Knotweed and Himalayan Balsam during any operations e.g. mowing, strimming or soil movement. It shall also contain measures to ensure that any soils brought to the site are free of the

seeds/root/stem of any invasive plant covered under the Wildlife and Countryside Act 1981, as amended. Development shall only be carried out in accordance with the approved method statement.

Reason: To prevent the spread of Japanese Knotweed and Himalayan Balsam, which are invasive non-native species found throughout the site, and pose a long term risk to biodiversity if they are not controlled, in accordance with Policy GI2 of the Watford Local Plan Core Strategy Policy 2006-31.

Services Strategy

15. No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence until a Services Strategy, setting out all existing services on the site to be removed or diverted and all new services to be provided, has been submitted to and approved in writing by the Local Planning Authority. The development shall be implemented accordance with the approved Strategy unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure these works do not have any adverse impacts on the local environment.

Sustainability Targets

16. No development shall commence until an Interim (Design Stage) Certificate issued by or on behalf of the British Research Establishment has been submitted to the Local Planning Authority to demonstrate that the shell and core design of the buildings will achieve a minimum BREEAM rating of 'Very Good'. This shall be supplemented by details of any measures that would need to be secured by the tenant fit out and a mechanism by which these will be secured. No unit shall be occupied until a Post-Completion Final Certificate, to certify that the rating of 'Very

Good' has been achieved, has been submitted to and approved in writing by the Local Planning Authority.

Reason: To accord with Policies SD1, SD2 and SD3 of the Watford Local Plan Core Strategy 2013.

Tree and shrub removal

17. No trees, scrub or hedges on the site shall be lopped, topped, felled, grubbed up or otherwise removed from the site between 1st March and 31st August in any year unless a suitably qualified ecologist has previously surveyed the trees, scrub or hedges and certified in writing to the Local Planning Authority that such works of removal will not harm nesting birds or any protected species.

Reason: To prevent harm to nesting birds and other protected species during the breeding season.

Tree Protection Measures

18. No works of development comprising site preparation (including but not exclusively demolition of buildings and structures, ground works, ground remediation and service diversions) or construction shall commence until the fencing to protect all trees, hedges and habitats to be retained and all watercourses as approved as part of the Construction Environmental Management Plan (Condition 4) has been erected on the site. No works shall take place within the protected areas until a method statement detailing the works to be undertaken and the methods to be used have been submitted to and approved in writing by the Local Planning Authority. Works within the protected areas shall only be undertaken in accordance with the approved method statement.

Reason: To safeguard the health and long term retention of the existing trees, shrubs and hedges on the site which represent an important visual and ecological asset within the River Colne corridor.

Existing and Proposed Ground Levels

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

Reason: To ensure an acceptable relationship between the proposed building and the adjoining highway and surrounding buildings.

External Materials

20. No development shall commence until details of the materials to be used for all the external finishes of the buildings, including all external walls, roofs, doors and windows, have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out only in accordance with the approved materials.

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

Hard Landscaping Scheme

21. No development shall commence until a hard landscaping scheme and details/samples of all materials to be used for all roads, footpaths, servicing areas and car parking areas has been submitted to and approved in writing by the Local Planning Authority. No part of the development shall be occupied until the approved hard landscaping works have been carried out.

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

Fencing and Boundary Treatments

22. No development shall commence until details of all means of enclosure and gates on the boundaries of the site and within the site have been submitted to and approved in writing by the Local Planning Authority. This shall include details of all retaining walls and structures within the site. No part of the development shall be occupied until the approved works have been carried out.

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

Soft Landscaping Scheme

23. No development shall commence until a soft landscaping scheme has been submitted to and approved in writing by the Local Planning Authority. This shall include but not be limited to the following:
- i) Details of all existing trees, shrubs and hedges to be retained.
 - ii) Details of all new tree, shrub, hedge and other planting proposed within the site.
 - iii) A schedule of planting including species, plant sizes and planting densities.
 - iv) Measures to enhance the biodiversity and ecological value of the site.
 - v) A planting specification for all new planting.
 - vi) A landscape management plan for the long term management and maintenance of all soft landscaping and biodiversity measures within the site.
 - vii) A phasing plan for the implementation of the soft landscaping scheme.

The soft landscaping scheme shall only be implemented in accordance with the approved details and shall be maintained in accordance with the approved

management plan at all times, unless otherwise agreed in writing by the Local Planning Authority.

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

External Lighting

24. No development shall commence until full details of the siting, height, design and type of all external lighting and details of ground lux levels have been submitted to and approved in writing by the Local Planning Authority. The lighting shall be designed to minimise any light spillage towards the River Colne and wildlife area and to minimise any adverse impacts on wildlife. The external lighting shall only be installed in accordance with the approved details.

Reason: To ensure light pollution is minimised in the interests of the River Colne and local ecology and the visual impact of the development, in accordance with Policies GI3 and UD1 of the Watford Local Plan Core Strategy 2006-31.

New Access Junction

25. No part of the development shall be occupied until the new access junction with the Access Road, as shown in principle on the approved drawings, has been completed in full.

Reason: To ensure safe and adequate vehicular and pedestrian access to the development and in the interests of highway safety, in accordance with saved Policies T21, T22 and T24 of the Watford District Plan 2000.

Car Parking Provision and Servicing

26. No part of the development shall be occupied until the car parking spaces, service yards and manoeuvring areas shown on the approved drawings have been laid out and constructed in full, unless otherwise approved in writing by the Local Planning

Authority. The car parking spaces, service yards and manoeuvring areas shall be retained at all times for these purposes.

Reason: To ensure adequate parking and servicing facilities are provided on the site and to prevent on-street parking and waiting of vehicles, in accordance with saved Policies T21, T22 and T24 of the Watford District Plan 2000.

Cycle Parking Provision

27. No part of the development shall be occupied until details of the siting, size, design and external materials of cycle stores for each of the proposed units (or communal stores to be shared by units) have been submitted to and approved in writing. The respective stores shall be retained at all times for cycle storage only and shall not be used for any other purpose.

Reason: To ensure adequate facilities are provided for the occupiers of the site and in the interests of the visual appearance of the site and its impact on the street scene and character of the surrounding area, in accordance with Policies SD1 and UD1 of the Watford Local Plan Core Strategy 2006-31 and saved Policies T10 and T21 of the Watford District Plan 2000.

Bin Storage Provision

28. No part of the development shall be occupied until details of the siting, size, design and external materials of bin stores (for waste and recycling) for each of the proposed units (or communal stores to be shared by units) have been submitted to and approved in writing. The respective stores shall be retained at all times for bin storage only and shall not be used for any other purpose.

Reason: To ensure adequate facilities are provided for the occupiers of the site and in the interests of the visual appearance of the site and its impact on the street scene and character of the surrounding area, in accordance with Policies SD1 and

UD1 of the Watford Local Plan Core Strategy 2006-31 and saved Policy SE7 of the Watford District Plan 2000.

Plant and Equipment

29. No plant or equipment shall be installed externally on any building or within the site until full details have been submitted to and approved in writing by the Local Planning Authority. These details shall include the type, size and design of the plant/equipment; its siting and height above ground level; measures to mitigate its visual impact; details of any noise or odours emitted by the plant/equipment; and measures to mitigate any impacts arising from noise or odours. The plant/equipment shall only be installed in accordance with the approved details and shall be retained as such at all times.

Reason: In the interests of the visual appearance of the site and its impact on the street scene and character of the surrounding area, in accordance with Policies SD1 and UD1 of the Watford Local Plan Core Strategy 2006-31

Specified Uses

30. The units hereby permitted shall only be used for purposes within Classes B1(b), B1(c), B2 and B8 of the schedule to the Town and Country Planning (Use Classes) Order 1985 (as amended) and for no other use, unless otherwise approved in writing by the Local Planning Authority.

Reason: To ensure the units are used only for employment uses in accordance with the approved masterplan and to accord with the uses assessed in the Environmental Statement.

Trade Counters

31. In respect on any unit used for purposes within Class B8, no trade counter provided within that unit shall exceed 10% of the gross internal ground floor area of the unit and shall not exceed 40m² in any event.

Reason: To ensure the units are used only for employment uses in accordance with the approved masterplan.

Maximum Floorspace

32. The maximum floorspace that shall be provided within the approved buildings shall not exceed 6,950m² gross internal area (GIA).

Reason: To accord with the level of floorspace assessed within the Environmental Statement.

Travel Plan

33. No unit shall be occupied until a detailed Travel Plan based upon the Framework Travel Plan (March 2014) has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall be operated as approved at all times, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To promote alternative modes of transport to the private car and minimise impacts on the local highway network and the wider environment.