

Your Ref: **PP-12354398**  
Our Ref: HPD/AH/SW/23/125  
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Place Shaping and Corporate Performance – Development Control  
Watford Borough Council  
Town Hall  
Watford  
WD17 3EX

Dear Sir/Madam,

**RE: TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015, SCHEDULE 2, PART 20, CLASS A**

**103-114 COURTLANDS CLOSE, WATFORD WD24 5GX**

On behalf of our client, Quadron Properties Ltd (the 'Applicant'), we hereby enclose an application for a determination as to whether the prior approval of Enfield Council is required for the construction of an additional storey of new dwellinghouses on the detached block of flats at 103-114 Courtlands Close in Watford.

This application is submitted in accordance with the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended; in particular Schedule 2, Part 20, Class A (GPDO).

Accordingly, the following documentation form the basis of this submission:

- Duly Completed Prior Notification Application Form;
- Completed CIL Form;
- Drawing Pack (including Site Location Plan at scale 1:1,250) prepared by Metashape Architects;
- Design and Access Statement prepared by Metashape;
- Daylight/Sunlight and Overshadowing Assessment prepared by NRG Consulting;
- Parking Survey prepared by Phoenix Surveys; and
- Planning Covering Statement prepared by Hybrid Planning & Development (this document).

**1) THE SITE AND SURROUNDING AREA**

The application site comprises a three-storey block of 10 no. self-contained residential flats located within Courtland Close south of the A41. The area surrounding the site is predominately residential, characterised by three storey blocks of flats and two storey semi-detached houses along the southern boundary of the A41. There is a mix of two storey semi-detached houses, warehouses, and Warner Bros. Studios north of the A41.

The site is not located within a conservation area nor does the site does not contain any statutorily or locally listed. Additionally, there are no Article 4 Directions affecting the site. The site is in a Flood Zone 1, and therefore, at the lowest risk of flooding. The site is not affected by any other environmental designations.

The site is approximately a 20-minute bus ride from the Watford Junction Railway Station which provide regular services into Central London via a train to Euston Station.

There are refuse bins on the west side of the site, with further space for any needed additional refuse bin space and bike storage, as well as space at the east and rear of the site. Bike parking will be both covered and secured.

## 2) PROPOSED DEVELOPMENT

It is proposed to construct one additional storey on the existing detached block of flats on 103-114 Courtlands Close, providing 4 no. x 1 bed 2 person flats.

The design and materiality of the additional storey will mimic the existing building using the same exterior materials, multi red and yellow bricks. The placement of the proposed windows also matches the existing fenestration. Brickwork detailing along the copings will be introduced to mirror the existing detailing at the fourth floor.

Internally, new flats shall include high quality fixtures and fittings and ample built-in storage space. All the proposed dwellings will comply with, or exceed, the Nationally Described Space Standards.

Due to the site's highly accessible location and existing residential car parking to the front, the development is proposed as car free. Notwithstanding, a policy-compliant level of cycle parking (6 no. spaces) will be provided within the site for future residents.

No external alterations to the existing building are proposed by way of this application. As will be later described in this letter, the upwards extension will comply with the full requirements of Class A.

## 3) TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) ENGLAND ORDER 2015

The Town and Country Planning (General Permitted Development) (England) Order 2015 ('GPDO, 2015') which came into force on 15 April 2015 and was most recently amended in December 2021, permits the construction of additional storeys on existing detached blocks of flats, in order to provide new dwellinghouses, without requiring planning permission, in accordance with Schedule 2, Part 20, Class A.

Specifically, Class A considers the following as permitted development:

*"Development consisting of works for the construction of up to two additional storeys of new dwellinghouses immediately above the existing topmost residential storey on a building which is a purpose-built, detached block of flats, together with any or all—*

- (a) engineering operations reasonably necessary to construct the additional storeys and new dwellinghouses;*
- (b) works for the replacement of existing plant or installation of additional plant on the roof of the extended building reasonably necessary to service the new dwellinghouses;*
- (c) works for the construction of appropriate and safe access and egress to access to and egress from the new and existing dwellinghouses, including means of escape from fire, via additional external doors or external staircases;*
- (d) works for the construction of storage, waste or other ancillary facilities reasonably necessary to support the new dwellinghouses.*

Development under Part 20, Class A is subject to a number of restrictions, exclusions and conditions, as well as a Prior Approval process, all of which are discussed in greater detail in the following sections.

## 4) CLASS A QUALIFYING ASSESSMENT

Before considering whether the prior approval of the Local Planning Authority is required, an assessment must first be undertaken to determine whether the proposal constitutes permitted development under the terms of Part 20, Class A.

The following table sets out in more detail how the building and proposed development qualifies for Permitted Development in respect of Paragraph A.1.

### A.1 Development is not permitted by Class A if:

GDPO Criteria (A.1) Proposal Assessment	Proposal Assessment
(a) <i>the permission to use any building as a dwellinghouse has been granted only by virtue of Class M, MA, N, O, P, PA or Q of Part 3 of this Schedule;</i>	The existing dwellinghouses were permitted in accordance with the original consent for the site (LPA ref: 87/2679) and not by virtue of any Class within Part 3.
(b) above ground level, the building is less than 3 storeys in height;	The existing building is three storeys, all above ground level.
(c) the building was constructed before 1st July 1948, or after 5th March 2018;	The building was constructed circa 1989 following the granting of planning permission (LPA ref: 87/2679).
(d) the additional storeys are constructed other than on the principal part of the building;	The additional storey is proposed on the principal part of the building.
(e) the floor to ceiling height of any additional storey, measured internally, would exceed the lower of— (i) 3 metres; or (ii) the floor to ceiling height, measured internally, of any storey of the principal part of the existing building;	The internal floor-to-ceiling height of the additional storey will not exceed 3m, nor will it exceed that of any existing storey within the principal part of the building.
(f) the new dwellinghouses are not flats;	All the proposed dwellinghouses are self-contained residential flats.
(g) the height of the highest part of the roof of the extended building would exceed the height of the highest part of the roof of the existing building by more than 7 metres (not including plant, in each case);	As extended, the height of the highest part of the roof would not exceed the height of the highest part of the existing roof by more than 7 metres.
(h) the height of the highest part of the roof of the extended building (not including plant) would be greater than 30 metres;	The height of the extended building would not be greater than 30 metres.
(i) development under Class A.(a) would include the provision of visible support structures on or attached to the exterior of the building upon completion of the development;	No visible support structures will remain attached to the exterior of the building upon completion of the development.
(j) development under Class A.(a) would consist of engineering operations other than works within the existing curtilage of the building to—  (i) strengthen existing walls; (ii) strengthen existing foundations; or (iii) install or replace water, drainage, electricity, gas or other services;	The proposed engineering works would be proposed within the existing curtilage of the building and would only consist of the essential works referred to in (j) (i) to (iii).
(k) in the case of Class A.(b) development there is no existing plant on the building;	There is no existing plant on the roof and therefore this point is not considered relevant.
(l) in the case of Class A.(b) development the height of any replaced or additional plant as measured from the lowest surface of the new roof on the principal part of the new building extended building would exceed the height of any existing plant as measured from the lowest surface of the existing roof on the principal part	No additional plant is being proposed as part of the development.

GDPO Criteria (A.1) Proposal Assessment	Proposal Assessment
of the existing building;	
(m) development under Class A.(c) would extend beyond the curtilage of the existing building;	The proposed development is located wholly within the curtilage of the site.
(n) development under Class A.(d) would—  (i) extend beyond the curtilage of the existing building; (ii) be situated on land forward of a wall forming the principal elevation of the existing building; or (iii) be situated on land forward of a wall fronting a highway and forming a side elevation of the existing building;	The proposed storage areas for waste and ancillary cycle parking will be contained within the curtilage of the existing building, in the adjacent garden area. The proposed cycle store will not be situated forward of the principal elevation of the building, nor forward of a side elevation fronting a highway.
(o) the land or site on which the building is located, is or forms part of—  (i) article 2(3) land; (ii) a site of special scientific interest; (iii) a listed building or land within its curtilage; (iv) a scheduled monument or land within its curtilage; (v) a safety hazard area; (vi) a military explosives storage area; or (vii) land within 3 kilometres of the perimeter of an aerodrome	The site is not located on, nor forms part of, any of the relevant exclusionary areas.

For these reasons, it is considered that the proposal constitutes permitted development under the terms of the Town and Country Planning (General Permitted Development) (England) Order 2015, Schedule 2, Part 20, Class A (as amended 2021).

## 5) PRIOR APPROVAL ASSESSMENT

Subject to complying with the above points, proposals permitted by Class A are subject to the condition that, before beginning the development, the developer must apply to the LPA for Prior Approval. The following section considers the relevant Prior Approval matters in turn.

### Transport and highways impacts

In accordance with the Council's strategic aims to reduce car dependency and in light of the site's highly sustainable location, the proposals do not include any additional car parking at the site. As discussed previously, the site is situated within a highly accessible location for walking, cycling and public transport.

The car parking provision for Courtlands Close totals approximately 261 spaces for the existing 167 flats. Census data from 2022 suggests less than one car is owned for every two flats, giving an estimated total car ownership of about 130 cars. On this basis, we consider there to be excess capacity available within the estate to absorb any additional car parking arising from the proposal.

The car parking survey undertaken by Phoenix Traffic Surveys Limited during 09/2023 determined that there were at least 122 available on-street or bayed resident parking in the area excluding disabled spaces daily. Additionally, it was found that each night there was extremely low stress levels of 40% respectively. The rest of the area also has considerable capacity for additional parking which would be associated with the development would still not bring the overall stress level of level up to a level near capacity.

In seeking to promote sustainable travel, it is intended to provide cycle parking for the development in accordance with the standards set out in the London Plan (2021).

#### **Air traffic and defence asset impacts of the development**

The site is not located in proximity to an aerodrome, nor is it located nearby military/defence storage areas. As such the above is not considered of relevance to the proposed development.

#### **Contamination risks in relation to the building**

We do not consider land contamination risks to be of relevance to the submission. The site is an existing, residential building located in a wholly residential area with no historical evidence of contamination, and the new dwellings will be erected atop the existing building.

#### **Flooding risks in relation to the building**

The Environment Agency's Flood Map for Planning shows that the site is located in Flood Zone 1, an area with a low probability of flooding. The site is not considered to be within an area which is at risk of flooding, is smaller than 1 hectare in site area and is not at risk by other sources of flooding.

The proposed extension does not involve an increase in impermeable area. As such, there will be no increase in surface water runoff as a result of the proposals. Accordingly, there is no risk of flooding and the change in land use is acceptable in flood risk terms.

#### **The external appearance of the building**

A full set of existing and proposed elevations have been submitted as part of this prior notification submission together with a design and access statement.

As stated in the GPDO legislation, the assessment of the design is restricted to the external appearance in the context of the existing building itself, and not the wider street scene. As such, and in seeking to create an extension which integrates into the host building, the design and materiality of the extension will mirror the existing building. Through matching the predominate building material, multi-buff brick, and using multi-red brick copings, the extension will merge seamlessly with the existing building. The existing roof form will also be carried through the extension, maintaining the step down at the stair core.

Notwithstanding, we consider the additional storey to be a proportionate addition to this three-storey detached block. Together with the other buildings in Courtlands Close, the building as proposed will be no more out-of-character or visually incongruous than the existing building. The building should, therefore, be read within the immediate context of the group of buildings on Courtlands Close, and not within the wider area context.

Accordingly, we consider that through mirroring the design of the existing building, the proposals presented as part of this application are entirely appropriate and acceptable in terms of design and external appearance.

#### **The provision of adequate natural light**

As can be seen on the submitted floor plans and elevations, each flat will be triple aspect and benefit from 5 no. windows, allowing more than adequate natural light to flood the habitable rooms. As a result, the proposed dwellings will provide a very high quality of living accommodation for future residents.

#### **Impact on the amenity of the existing building and neighbouring premises**

The nearest residential properties are 103-114 Courtlands Close and 115-126 Courtlands Close.

In terms of daylight/sunlight impacts, the application is accompanied by a Daylight, Sunlight and Overshadowing Assessment prepared by NRG Consulting specifically analysing the impact on neighbouring properties as a result of the proposed development. The Report concludes that the windows to all neighbouring residential

properties shall experience negligible impacts, such that all windows shall continue to exceed the BRE's guidance in terms of VSC, APSH and WPSH. As such, the proposals will have no detrimental impact on neighbouring premises in terms of daylight or sunlight impacts.

The provision of four additional residential flats within the building will not significantly increase activity or noise, such that it would be a detriment to existing residents. Residential uses are not intensive uses in the same way that general industry and/or warehouse uses would be. A fabric-first approach will be taken to the design and construction of the new flats, with suitable noise mitigation provided between floorplates, the details of which may be secured by way of condition.

Accordingly, we consider there to be no adverse impact on the amenity of the existing building or neighbouring premises as a result of the proposals.

### **Impact on protected views**

The site is not located in a location which would affect a Protected Vista, and so this is not considered relevant to the submission.

### **Fire Safety Considerations**

The building would not exceed 18 metres in overall height, and so there is no requirement to provide fire safety details for the proposals. Furthermore, the fire safety impacts on the intended occupants of the building have not been prepared as part of this Prior Approval as the building does not exceed 18 metres.

## **6) PART W REQUIREMENTS**

Paragraph (2) of the 'Procedure for applications for prior approval under Part 20' states that the following provisions apply where applications are made under Part 20 of the GPDO 2015. A developer is required to make an application to a local planning authority for a determination as to whether the prior approval of the authority will be required, and the prior notification application should be accompanied with the following information:

- (a) A written description of the proposed development, which, in relation to development proposed under any of Classes A to AD, must include details of any dwellinghouse and other works proposed under paragraph A(a) to (d), AA(1)(a) to (d), AB(3)(a) to (d), AC(2)(a) to (c), or AD(2)(a) to (c) (as the case may be) – *This information is included within this Cover Letter and shown on the accompanying drawings.*
- (b) a plan which is drawn to an identified scale and shows the direction of North indicating the site and showing the proposed development – *a set of existing and proposed plans are enclosed with this submission.*
- (c) floor plans which are drawn to an identified scale and show the direction of North indicating the total floor space in square metres of each dwellinghouse, the dimensions and proposed use of each room, the position and dimensions of windows, doors and walls, and the existing and proposed elevations of the building – *a set of existing and proposed plans showing all of the requirements of (c) have been submitted in support of this application.*
- (d) a written statement specifying the number of new dwellinghouses proposed by the development (that is, additional to any dwellinghouses in the existing building) – *a total of four dwellings are proposed by this prior approval application.*
- (e) A list of all addresses of any flats and any other premises in the existing building – *Appendix 1 sets out the addresses of all other flats within the existing building.*
- (f) the developer's contact address – *14 Lodge Road London NW4 4EF*
- (g) the developer's email address if the developer is content to receive communications electronically - *all correspondence to be sent via Hybrid Planning & Development Limited – [sward@hpduk.com](mailto:sward@hpduk.com).*
- (h) where—



- i. sub-paragraph (6) requires the Environment Agency to be consulted, a site-specific flood risk assessment – *not considered relevant*.
- ii. sub-paragraph (6A) requires the Health and Safety Executive to be consulted, a statement about the fire safety design principles, concepts and standards that have been applied to the development – *not considered relevant*.
- iii. where the application for prior approval relates to the requirement mentioned in paragraph A.2(1)(i) or AA.2(1)(k), a report from a chartered engineer or other competent professional confirming that the external wall construction of the existing building complies with paragraph B4(1) of Schedule 1 to the Building Regulations 2010 – *not considered relevant*.

## 7) CONCLUSION

We trust that you have sufficient information to consider this prior approval for the upward extension of 103-114 Courtlands Close to provide 4 no. residential dwellings (Class C3).

We believe that sufficient information has been provided to allow the Council to grant Prior Approval for the additional storey in accordance with Schedule 2, Part 20, Class A of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

Notwithstanding, please do not hesitate to contact me (079 9770 0050 / [ward@hpduk.com](mailto:ward@hpduk.com)) should you wish to discuss any of the content of this submission in further detail.

Yours faithfully



**Simone Ward**  
PLANNER

## APPENDIX 1: ADDRESS DETAILS OF EXISTING FLATS

Flat Number	Site Address
103	Courtlands Close, Watford, WD24 5GX
104	Courtlands Close, Watford, WD24 5GX
105	Courtlands Close, Watford, WD24 5GX
106	Courtlands Close, Watford, WD24 5GX
107	Courtlands Close, Watford, WD24 5GX
108	Courtlands Close, Watford, WD24 5GX
109	Courtlands Close, Watford, WD24 5GX
110	Courtlands Close, Watford, WD24 5GX
111	Courtlands Close, Watford, WD24 5GX
112	Courtlands Close, Watford, WD24 5GX
113	Courtlands Close, Watford, WD24 5GX
114	Courtlands Close, Watford, WD24 5GX