

**43-45 PARK ROAD,
WATFORD, WD17 4QW**

PLANNING STATEMENT

MS SUZY DEAN

FULL PLANNING APPLICATION

MARCH 2024



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1.0 EXECUTIVE SUMMARY

- 1.1 This Planning Statement has been prepared by Montagu Evans LLP to assist with the consideration and determination of an application for full planning permission (“the Application”) under the planning portal ref: PP-12658166 on behalf of Ms Suzy Dean (“the Applicant”) for development at 43-45, Park Road, Watford, WD17 4QW (“the Site”).
- 1.2 The Site is located in the Nascot Conservation Area and comprises a Locally Listed Building ‘Innage House’. The building, designed by architects John Thomas Christopher and Eley Emlyn White in 1881, is identified as contributing positively to the conservation area, though its contribution has been diluted by its later subdivision from its original villa form and other alterations. No. 43 and 45 Park Road are two storey semi-detached dwellings with vehicular access off Park Road. The Site is subject of an Article 4 Direction which removes permitted development rights under Schedule 2, Part 1, Classes A, C and D; and Part 2 Classes A and C of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).
- 1.3 The area surrounding the site in the wider Conservation Area largely retains its Victorian character and through its surviving urban form and architectural detail. Park Road consists of large detached and semi-detached houses on the south side of the road, with small, blocked developments on the north side. London stocks are the predominant facing brick with stone dressing used on a number of buildings. No. 41 Park Road which sits adjacent to the east of the site is a picturesque two-storey detached dwelling which makes a positive contribution to the character and appearance of the Conservation Area. Beyond this at No. 39 the scale varies in height from one to two storeys and this too contributes positively to the Conservation Area. Directly in front of the site at No. 72 reads as a modern looking two-storey detached house and adjacent to this sits a three-storey apartment block, also modern in appearance.
- 1.4 Planning permission is sought for the amalgamation of No. 43 and No. 45 Park Road, Watford, WD17 to create a single family dwellinghouse (Use Class C3) with associated boundary treatment and landscaping.
- 1.5 The description of development is as follows:
- “Demolition and replacement of the existing conservatory, amalgamation of no. 43 and no. 45 park road to create a single-family dwelling use class C3 as well as internal alterations, associated landscaping and boundary treatment”.*
- 1.6 The Site is located in Watford Borough Council (the “Council”). The Site extends approximately 0.21 ha. The location plan (ref: 0158_0001) at **Appendix 1** submitted as part of this application shows the Site in the context of the surrounding area. Full details on the Site and the surrounding area are set out in Section 3.0 of this statement.
- 1.7 The proposed development comprises of the following elements:
- Demolition of the existing conservatory and provision of a new enhanced conservatory
 - Amalgamation of No. 43 and No. 45 to create a single family dwelling
 - Internal alterations designed to meet the needs of a growing family
 - Provision of high-quality landscaping and associated boundary treatment to better reflect the historic plot layout
 - Alterations to the front façade to better reflect the original design intent for the building, including:
 - Restoring the original historic use of Innage House by unifying the two dwellings;
 - Removing superfluous front garden structures such as the shed at No. 45;

- Removing the plastic pipework from the front gable and replacing this with cast iron;
 - Proposing alternative thermally efficient aluminium frame heritage windows as per the previously consented application reference 22/01484/FULH;
 - Rationalising the boundary treatment and creation of a horseshoe driveway;
 - Replacing the non-original door on the front elevation and steps adjacent to the main bay window of No. 45 with a smaller window to match the original; and
 - Soft landscaping at the front garden to soften and enhance the overall appearance of the Site and its contribution to the character of the Conservation Area.
- 1.8 This application follows a previous application at No. 43 Park Road whereby planning permission was approved for “Erection of a single storey side and rear extension, formation of a new basement with car ports and an external sunken courtyard at the rear, and relocation of the main entrance door to the front elevation. Replacement windows to the front lounge to match existing” on 30th June 2023 under LPA Ref. 22/01484/FULH. The Decision Notice is at **Appendix 2**.
- 1.9 It should be noted that the Applicant is now seeking to acquire the adjacent property at No. 45 Park Road to accommodate their growing young family. The purpose of this application is therefore to amalgamate the two dwellings into one single family home, instead of implementing the plans consented under LPA Ref. 22/01484/FULH.
- 1.10 A suite of technical reports have been prepared and submitted as part of this planning application. This Planning Statement is one of those reports and provides a detailed planning policy assessment, considering the Proposed Development in the light of the relevant policies of the adopted Development Plan, as well as other material considerations.
- 1.11 The Planning Statement demonstrates that the Proposed Development:
- Is in accordance with relevant planning policy at national, regional and local level;
 - Would contribute positively to the delivery of housing, particularly large family housing of which there is an identified shortage in Watford;
 - Presents a high quality design which promotes sustainability measures throughout its design, construction and energy performance of the building;
 - Is in keeping with the character and appearance of the Conservation Area and results in an enhancement to the character and appearance of the conservation area which is a matter that should be accorded great weight;
 - Proposes significant heritage benefits by bringing the original external façade of Locally Listed ‘Innage House’ back into the public view; and
 - Delivers a comprehensive landscaping strategy throughout the Site which will offer biodiversity and ecological enhancements.
- 1.12 In conclusion, the Proposed Development is considered to be in accordance with both national planning policy guidance and the Development Plan when read as a whole. Therefore, planning permission should be granted.

2.0 INTRODUCTION AND BACKGROUND

2.1 This Planning Statement has been prepared by Montagu Evans LLP to assist with the consideration and determination of an application for full planning permission (“the Application”) under the planning portal ref: PP-12658166 on behalf of Ms Suzy Dean (“the Applicant”) for development at 43-45, Park Road, Watford, WD17 4QW (“the Site”).

2.2 Planning permission is sought for the amalgamation of No. 43 and No. 45 Park Road to create a single family dwellinghouse (Use Class C3) with associated boundary treatment and landscaping.

2.3 The description of development is as follows:

“Demolition and replacement of the existing conservatory, amalgamation of no. 43 and no. 45 park road to create a single-family dwelling use class C3 as well as internal alterations, associated landscaping and boundary treatment”.

2.4 This application follows a previous application at No. 43 Park Road whereby planning permission was approved for “Erection of a single storey side and rear extension, formation of a new basement with car ports and an external sunken courtyard at the rear, and relocation of the main entrance door to the front elevation. Replacement windows to the front lounge to match existing” on 30th June 2023 under LPA Ref. 22/01484/FULH.

2.5 It should be noted that the Applicant is now seeking to acquire the adjacent property at No. 45 Park Road to accommodate their growing young family. The purpose of this application is therefore to amalgamate the two dwellings into one single family home, instead of implementing the plans consented under LPA Ref. 22/01484/FULH.

2.6 The proposed development would contribute positively to the delivery of housing, particularly large family housing of which there is an identified shortage in Watford. Paragraph 6.34 of the Southwest Hertfordshire Local Housing Needs Assessment (2020) notes that there is a relatively low proportion of 4+-bedroom homes in the market stock in Watford (21% of the stock compared with 31% across the study area)¹.

2.7 The scheme will reinstate the original historic use of Innage House. The physical alterations to the landscaping, boundary and building itself will better reveal the building’s significance and enhance the character and appearance of the conservation area which is a matter that should be accorded great weight in the determination of this application.

OVERVIEW OF SCHEME PROPOSALS

2.8 The proposed development comprises the following key elements:

- Demolition of the existing conservatory and provision of a new enhanced conservatory
- Amalgamation of No. 43 and No. 45 to create a single family dwelling
- Internal alterations designed to meet the needs of a growing family
- Provision of high-quality landscaping and associated boundary treatment
- Alterations to the front façade to better reflect the original design intent for the building, including:
 - Restoring the original historic use of Innage House by unifying the two dwellings;
 - Removing superfluous front garden structures such as the shed at No. 45;

¹ <https://www.watford.gov.uk/downloads/file/165/south-west-hertfordshire-local-housing-needs-assessment-2020->

- Removing the plastic pipework from the front gable and replacing this with cast iron;
- Proposing alternative thermally efficient aluminium frame heritage windows as per the previously consented application reference 22/01484/FULH;
- Rationalising the boundary treatment and creation of a horseshoe driveway;
- Replacing the non-original door on the front elevation and steps adjacent to the main bay window of No. 45 with a smaller window to match the original; and
- Soft landscaping at the front garden to soften and enhance the overall appearance of the Site and its contribution to the character of the Conservation Area.

2.9 A full assessment of the scheme proposals is set out within Section 5.0 of this Statement. The proposed use is fully policy compliant and will deliver a high quality family sized dwelling with significant heritage, ecological and biodiversity enhancements.

PURPOSE AND FORMAT OF THE PLANNING STATEMENT

2.10 The purpose of this Planning Statement is to provide information to allow the necessary consideration of the development against all relevant planning policy and all other material considerations. The Statement sets out how the relevant planning policies and all other material considerations relevant to the determination of the application have been taken into account in the evolution of the scheme and the extent to which the scheme is compliant with all considerations to help inform the overall planning balance judgement.

2.11 The Planning Statement forms part of the information which has been submitted with this application, and is to be read in conjunction with the following documents:

- Schedule of Documentation, prepared by Montagu Evans;
- Application Covering Letter, prepared by Montagu Evans;
- Application Fee of £322;
- Application Form, prepared by Montagu Evans;
- Arboricultural Assessment prepared by Thomson Environmental Consultants;
- Community Infrastructure Levy Form, prepared by Montagu Evans;
- Site Location Plan, prepared by Stefan Shaw Studio;
- Drawing Schedule, prepared by Stefan Shaw Studio;
- Application Drawings, prepared by Stefan Shaw Studio;
- Design and Access Statement, including Schedule of Areas, prepared by Stefan Shaw Studio;
- Landscape Statement, prepared by Studio GB;
- Planning Statement, prepared by Montagu Evans; and
Heritage Statement prepared by Squire Heritage Consulting.

2.12 The Planning Statement demonstrates that the Proposed Development:

- Is in accordance with relevant planning policy at national, regional and local level;
- Would contribute positively to the delivery of housing, particularly large family housing of which there is an identified shortage in Watford;
- Presents a high quality design which promotes sustainability measures throughout its design, construction and energy performance of the building;
- Is in keeping with the character and appearance of the Conservation Area and results in an enhancement to the character and appearance of the conservation area which is a matter that should be accorded great weight
- Proposes significant heritage benefits by bringing the original external façade of Locally Listed 'Innage House' back into the public view; and

- Delivers a comprehensive landscaping strategy throughout the Site which will offer biodiversity and ecological enhancements.

2.13 Section 3.0 of this Statement provides background information on the Site, while Section 4.0 details the application proposals and Section 5.0 summarises the planning policy relevant to the Site. The proposals are then assessed against the policies in Section 6.0. Section 7.0 outlines the planning benefits of the scheme. Section 8.0 concludes the statement.

3.0 SITE LOCATION AND PLANNING HISTORY

THE SITE

- 3.1 The Location Plan shows the Site area subject to this application. The area, as defined by the red line boundary on the location plan at, measures 0.21 hectares.
- 3.2 The Site is located in the Nascot Conservation Area and comprises a Locally Listed Building formerly 'Innage House'. No. 43 and 45 Park Road are two storey semi-detached dwellings.
- 3.3 The area surrounding the Site is predominantly residential in character. Park Road consists of large detached and semi-detached houses on the South side of the road, with small, blocked developments to the North side. East of the Site on the other side of St Albans Road is the Watford Gateway Strategic Development Area which is allocated for mixed use development. West of the Site towards Langley Road is also residential in character with a mix of detached, demi-detached and flatted developments.
- 3.4 As detailed in the Heritage Statement submitted alongside the previous application LPA Ref. 22/01484/FULH. at **Appendix 3**, the Nascot Conservation Area lies to the North-East of Watford town centre – between St Albans Road and Hempstead Road. The wide expanse of St Albans Road provides a clear boundary to the eastern side of the Conservation Area.
- 3.5 The Site and is in Flood Zone 1 (low probability of flooding).
- 3.6 Both vehicular and pedestrian access to the Site is via Park Road.
- 3.7 The nearest bus stop is to the West of the Site on Grandfield Avenue, this is located approx. 0.2 mile from the Site (5 minutes' walk). Railway Bridge bus stop, located to the East of the Site is also a short distance (5 minutes' walk). The nearest railway station is Watford Junction which is located approx. 0.4 mile from the Site (9 minutes' walk). The Site therefore has very good public transport accessibility.

PLANNING HISTORY

- 3.8 A planning history search of Watford's online records reveals the following planning applications of relevance to at 43 Park Road Watford Hertfordshire WD17 4QW.

LPA Ref.	Proposal	Decision / Date
22/01484/FULH	Erection of a single storey side and rear extension, formation of a new basement with car ports and an external sunken courtyard at the rear, and relocation of the main entrance door to the front elevation. Replacement windows to the front lounge to match existing.	Approved 30 th June 2023
17/00046/TPO	Works to trees under TPO.138	Approved 27 th February 2017
17/00028/TCA	Cut down the Eucalyptus (1) tree in the back garden and the Elderberry tree (2) in the front	Approved 27 th February 2017

	garden (Nascot Conservation Area)	
15/01149/FULH	Replacement of existing wooden conservatory with a larger, modern, double-glazed conservatory.	Withdrawn 12 th October 2015
04/00143/FUL	Loft conversion with dormer windows to side elevation.	Refused 19 th April 2004
03/00712/FUL	Erection of a single storey front extension	Approved 24 th November 2003
85/00238/FUL	Erection of garage and conservatory at rear.	Approved 10 th December 1985
85/00237/FUL	Erection of garage at front and conservatory at rear.	Refused 5 th June 1985

3.9 The existing use class of the Site is Use Class C3. It should be noted that no changes are proposed under this application to the planning use class of this site.

4.0 THE PROPOSED DEVELOPMENT

4.1 As set out in Section 2.0 of this Statement, the Application proposes:

- Demolition of the existing conservatory and provision of a new enhanced conservatory given its existing poor condition
- Amalgamation of No. 43 and No. 45 to create a single family dwelling
- Internal alterations designed to meet the needs of a growing family
- Provision of high-quality landscaping and associated boundary treatment
- Re-provision of the original external façade of Innage House (pre-separation)

PRINCIPLE OF DEVELOPMENT

4.2 The proposed development would contribute positively to the delivery of high-quality housing, particularly large family housing of which there is an identified shortage in Watford.

LAYOUT AND SCALE

4.3 The development proposes a replacement modern conservatory with new and enhanced thermal performance and high-quality design. It should be noted that the proposed extension at 37.96m² is smaller in size than the previously proposed extension consented under application LPA Ref. 22/01484/FULH at 46.06m², albeit it is a slightly larger extension than the current built conservatory and garage at 30.7m². Furthermore, the proposed height conservatory is lower than the parapet of the previously proposed conservatory consented under application LPA Ref. 22/01484/FULH by 560mm.

4.4 It should be noted that the development does not propose a loss of residential floorspace in accordance with Policy HO3.2 of the Local Plan. The scale and massing of the development will remain in keeping with the surrounding context and setting of the Nascot Conservation Area.

DESIGN AND CONSERVATION

4.5 This application proposes heritage benefits to the house itself and the Nascot Conservation Area including:

- Restoring the original historic use of Innage House by unifying the two dwellings;
- Removing superfluous front garden structures such as the shed at No. 45;
- Removing the plastic pipework from the front gable and replacing this with cast iron;
- Proposing alternative thermally efficient aluminium frame heritage windows as per the previously consented application reference 22/01484/FULH;
- Rationalising the boundary treatment and creation of a horseshoe driveway;
- Replacing the non-original door on the front elevation and steps adjacent to the main bay window of No. 45 with a smaller window to match the original; and
- Soft landscaping at the front garden to soften and enhance the overall appearance of the Site and its contribution to the character of the Conservation Area.

TREES, LANDSCAPE, ECOLOGY AND ENVIRONMENT

4.6 The proposed development is far less environmentally intrusive than the previously consented scheme (LPA Ref. 22/01484/FULH) which included basement excavations.

- 4.7 As set out in the Landscape Statement, this application proposes a high quality landscaping scheme for the Site which will deliver ecological and biodiversity enhancements such as the planting of multi-stem and fruit trees, mixed groundcover planting, and planting of mixed shrubs, perennials and climbers. Additionally, a blend of native and non-native plants will extend ensure continuous colour and beauty throughout the year.

TRANSPORT AND ACCESS

- 4.8 The Site has very good public transport accessibility. The nearest bus stop is to the West of the Site on Grandfield Avenue, this is located approx. 0.2 mile from the Site (5 minutes' walk). Railway Bridge bus stop, located to the East of the Site is also a short distance (5 minutes' walk). The nearest railway station is Watford Junction which is located approx. 0.4 mile from the Site (9 minutes' walk).
- 4.9 The proposed development will not place any additional pressure on local services or result in any increased movement to and from the Site.
- 4.10 No changes are proposed to the existing pedestrian access. Vehicular access will remain off Park Road and there are no changes proposed to the servicing of the Site.
- 4.11 As illustrated in the Design and Access Statement the development seeks to join the existing two driveways into a single horseshoe shaped driveway.
- 4.12 The development proposes a horseshoe driveway to provide safe access and egress with associated boundary treatment and landscaping. We consider the proposed 'front garden' will enhance the overall appearance of the Site and restore the original character of Innage House.

SUSTAINABILITY AND ENERGY

- 4.13 As set out in the Design and Access statement, the proposal aims to be environmentally, socially, and economically sustainable by implementing various design and construction principles. In terms of environmental sustainability, the project focuses on refurbishment and alterations to minimize the need for new materials. Recycled and reused materials will be prioritized whenever possible, reducing the demand for virgin resources and minimizing waste.
- 4.14 Additionally, a high level of insulation will be incorporated into the new walls and roof, ensuring energy efficiency and reducing heat loss during the winter. The new fenestrations will be designed to optimize solar gains while minimizing heat loss.
- 4.15 The proposal is therefore considered to be aligned with local and national sustainability principles.

5.0 PLANNING POLICY AND LEGISLATION

5.1 This Application has been informed by adopted development plan policies and other relevant guidance as set out below. This section of the Statement provides a summary of the planning context, and **Section 7.0** provides an assessment of the Application against the policies and guidance summarised within this section.

STATUTORY FRAMEWORK

5.2 Section 38(6) and 70 of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan unless material considerations indicate otherwise.

5.3 Section 72 of the Town and Country Planning Act (Listed Buildings and Conservation Areas) 1990 requires planning authorities in discharging their functions in Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

THE STATUTORY DEVELOPMENT PLAN

5.4 The Development Plan for Watford Borough Council comprises the Watford Local Plan 2021-2038 (2022).

EMERGING POLICY

5.5 There is no emerging planning policy.

NATIONAL POLICY AND GUIDANCE

5.6 The 2023 National Planning Policy Framework (“the NPPF”) sets out the Government’s approach to planning matters and is a material consideration in the determination of planning applications.

5.7 At the heart of the NPPF is a presumption in favour of sustainable development which should be seen as a golden thread running through decision-taking (Paragraph 11). This paragraph goes on to state that:

For decision-taking this means:

- Approving development proposals that accord with an up-to-date development plan without delay; or
- Where there are no relevant policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
- The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

PLANNING PRACTICE GUIDANCE

5.8 Alongside the NPPF (2023), the Government has published Planning Practice Guidance (“PPG”) documents which are also a material consideration during the determining of planning applications.

PLANNING DESIGNATIONS

5.9 The following planning designations as set out in the Adopted Local Plan Policy Map (2022) are of relevance to this site:

- Nascot Conservation Area
- Locally Listed Building 'Innage House'
- Source Protection Zone 2-3
- Tree Preservation Order (TPO)

5.10 The Site and is in Flood Zone 1 (low probability of flooding).

6.0 PLANNING POLICY ASSESSMENT

6.1 This section of the statement provides a planning policy assessment of the proposals subject of this application at the Site. We set out below an assessment of the key issues, comprising:

- Principle of Development
- Layout and Scale
- Design and Conservation
- Trees, Landscape and Ecology
- Transport and Access
- Sustainability and Energy

PRINCIPLE OF DEVELOPMENT

6.2 **Paragraph 69** of the NPPF (2023) requires local planning authorities to ensure planning policies identify a sufficient supply and mix of Sites taking into account their availability, suitability and likely economic viability.

6.3 **Policy H03.1** 'Housing Provision' of the adopted Local Plan (2022) states that "Proposals for residential development will be supported where they contribute positively towards meeting local housing needs and achieving sustainable development". Furthermore, the policy highlights the importance of optimising the use of land and providing a mix of homes including size, tenure and specialist adaptations to support people with different needs to ensure good quality homes are provided for all, both now and in the future.

6.4 **Paragraph 3.11** notes that "The types of new homes coming forward during the plan period should reflect the needs of local people, present and future, and account for market trends". In addition, Paragraph 3.13 notes that "proposals for residential development will be expected to provide a housing mix that includes a proportion of family-sized homes with three or more bedrooms".

6.5 **Paragraph 3.47** states that "To achieve sustainable development and improve health and wellbeing, new homes need to be of a quality to enable people to live comfortably in circumstances that meet their needs. This applies to all members of our community who may be at different stages of their lives and have different family circumstances".

6.6 **Policy H03.2** 'Housing Mix, Density and Optimising Use of Land' of the adopted Local Plan (2022) states that "If a net loss of residential accommodation is proposed, applicants will be required to demonstrate how the benefit of the scheme outweighs this loss".

6.7 There is a starting point here that there is no net loss of residential land in the meaning of the policy. The floor area is maintained and the policy does not expressly prohibit amalgamation.

6.8 **Paragraph 6.34** of the Southwest Hertfordshire Local Housing Needs Assessment (2020) notes that there is a relatively low proportion of 4+-bedroom homes in the market stock in Watford (21% of the stock compared with 31% across the study area)² and 25% compared with England.

6.9 The development proposes the amalgamation of No. 43 and 45 to create a single family dwelling. As such, the proposed development would contribute positively to the delivery of high-quality housing, particularly large family housing of which there is an identified shortage in Watford. The development will therefore meet local housing need and achieve sustainable development in accordance with the NPPF (2023) and **Policy H03.1**.

² <https://www.watford.gov.uk/downloads/file/165/south-west-hertfordshire-local-housing-needs-assessment-2020->

Whilst the development will result in the loss of housing supply (by one unit), the development does not propose a net loss in floorspace. Furthermore, we consider that the amalgamation of these two dwellings will consequentially deliver planning and environmental benefits that should be accorded great weight bringing the former non-separated Innage House back into the foreground thus complying with **Policy HO3.2**.

6.10 What is more, we consider the proposed amalgamation of the two dwellings will deliver heritage benefits by bringing the former non-separated Innage House back into the foreground thus complying with Policy HO3.2. Other heritage benefits include:

- Restoring the original historic use of Innage House by unifying the two dwellings;
- Removing superfluous front garden structures such as the shed at No. 45;
- Removing the plastic pipework from the front gable and replacing this with cast iron;
- Proposing alternative thermally efficient aluminium frame heritage windows as per the previously consented application reference 22/01484/FULH;
- Rationalising the boundary treatment and creation of a horseshoe driveway;
- Replacing the non-original door on the front elevation and steps adjacent to the main bay window of No. 45 with a smaller window to match the original; and
- Soft landscaping at the front garden to soften and enhance the overall appearance of the Site and its contribution to the character of the Conservation Area.

LAYOUT AND SCALE

6.11 **Section 12** 'Achieving Well Designed Places' of the NPPF (2023) highlights the importance of good architecture, layout and appropriate and effective landscaping.

6.12 **Policy QD6.2** 'Design Principles' of the adopted Local Plan (2022) states that "The scale and massing of proposed buildings will need to relate to the local context and the role of the area". Building footprints are to be of an appropriate scale, enhance the relationship between buildings individually, collectively and the spaces between them to create environments that are relatable to people and easy to understand.

6.13 Part (g) of **Policy QD6.4** 'Building Design' of the adopted Local Plan (2022) states that "Internal layouts should provide for working at home, implementing the technical internal space standards; this could be the inclusion of space within individual dwellings for a home office, or a shared workspace within the building".

6.14 The development proposes a replacement modern conservatory with new and enhanced thermal performance and high-quality design. The new proposed conservatory will be better in keeping with the existing built form in terms of design and materiality. It should be noted that the proposed conservatory is more modest in size than the conservatory consented under the previous application LPA Ref. 22/01484/FULH by 8.06m², the proposed development is also lower than the parapet height of the previously consented conservatory extension by 560mm.

6.15 It should be noted that the development does not propose the loss of floorspace on any upper floors. No additional floorspace is proposed and the scale and massing of the development will remain in keeping with the surrounding context and setting of the Nascot Conservation Area. Furthermore, no changes are proposed to the scale, bulk or massing of the Site, as such we consider the development accords with local and national planning policy.

DESIGN AND CONSERVATION

Design

- 6.16 **Section 12** 'Achieving well designed and beautiful places' of the NPPF (2023) outlines the requirement of good design and sets out that development should:
- Function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - Optimise the potential of the Site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 6.17 **Policy QD6.1** 'Design for an Attractive Town' of the adopted Local Plan (2022) states that "New Development in Watford is required to deliver high quality design. Buildings will be designed to minimise environmental impact including mitigating climate change impacts, deliver attractive and functional spaces and reinforce and develop a distinctive local character with durable, lasting materials. Proposals will be required to demonstrate that they have responded positively to sensitive areas. New public realm will be attractive, accessible and reflective of the needs of the community".
- 6.18 **Policy QD6.2** 'Design Principles' of the adopted Local Plan (2022) states that "Proposals for new development will be required to show how they will make a positive contribution to high quality design and place-making". Furthermore, the policy notes that new buildings and streets are to be attractive and distinctive. Street scenes are to be of high quality, welcoming and take design cues from existing buildings, where they make a positive contribution to the character of the area, ensuring it is identifiable and relatable to residents.
- 6.19 **Policy QD6.4** 'Building Design' of the adopted Local Plan (2022) states that "Well designed buildings that are visually attractive, functional, accessible, sustainable, mitigate climate change, and that reflect the character and wider objectives for the area, will be supported".
- 6.20 As set out in Design and Access Statement, Careful attention has been given to the materials and proportions of the extension to ensure they seamlessly fit with the original house and wider conservation area, with the ultimate objective to enrich both the appearance and character of the original building and its environment.
- 6.21 The development proposes a high-quality replacement of the existing conservatory, that is more modest in scale and size and better in keeping with the character of the main house. The proposed amalgamation of the two dwellings has been sensitively designed to restore the former character and appearance of the Locally Listed Building.

Conservation

- 6.22 **Section 16** 'Conserving and Enhancing the Historic Environment' of the NPPF (2023) states that "In determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness".
- 6.23 Paragraph 205 of the NPPF (2023) states that "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance".
- 6.24 **Chapter 7** 'The Historic Environment' of the adopted Local Plan (2022) sets out local guidance on conserving and enhancing Heritage Assets. **Policy HE7.1** 'Enhancement and Protection of the Historic Environment' notes that "Development proposals should embrace opportunities to use the historic environment to support good design and enhance the setting and understanding of the historic environment and improve Watford's historic character". Furthermore, the policy notes that "All development proposals involving heritage assets (designated and undesignated) should avoid causing harm to the significance of those assets, including their setting. Where this cannot be avoided, measures to minimise or mitigate the harm caused will be considered and balanced against the heritage and public benefits arising from the development according to the importance of the asset and the extent of the impact to its significance".
- 6.25 **Policy HE7.2** 'Designated Heritage Assets' states that "Development in conservation areas will be supported where they preserve and, where possible, enhance the character, appearance and significance of the designation".
- 6.26 As the site is in the Conservation Area, the proposal directly affects a Designated Heritage Asset. Proposals within or affecting the setting of Heritage Assets are required to demonstrate how the proposal will respect and enhance the asset. 'Conservation' is defined in the NPPF's glossary as "The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance". Thus, benefits to Designated Heritage Assets are also afforded great weight in the terms of the NPPF.
- 6.27 As set out in the Heritage Statement at **Appendix 3**, the Conservation Area largely retains its Victorian character and through its surviving urban form and architectural detail. The key difference between this area and many of the other areas of Watford that date from the nineteenth century, relates to the notable variety of architectural styles displayed and to the diversity of detailing evident on the buildings. Furthermore, it notes there are several locally listed buildings and many unlisted houses which provide good examples of the use of traditional materials.
- 6.28 Furthermore, the Heritage Statement discusses the setting of the locally listed building at no's 43-45. In our view, the proposal will have a positive impact on enhancing the overall setting of the Conservation Area (Designated Heritage Asset) as well as the quality and appearance of the Locally Listed, Non-Designated Heritage Asset. Furthermore, heritage benefits will be delivered as part of this proposal which include:
- Restoring the original historic use of Innage House by unifying the two dwellings;
 - Removing superfluous front garden structures such as the shed at No. 45;

- Removing the plastic pipework from the front gable and replacing this with cast iron;
- Proposing alternative thermally efficient aluminium frame heritage windows as per the previously consented application reference 22/01484/FULH;
- Rationalising the boundary treatment and creation of a horseshoe driveway;
- Replacing the non-original door on the front elevation and steps adjacent to the main bay window of No. 45 with a smaller window to match the original; and
- Soft landscaping at the front garden to soften and enhance the overall appearance of the Site and its contribution to the character of the Conservation Area.

6.29 Overall, we consider the development acceptable for the following key reasons:

1. The proposal will greatly enhance the character and appearance of the Conservation Area (Designated Heritage Asset), therefore great weight should be accorded to these benefits; and
2. The proposal will enhance and better reveal the significance of the Locally Listed, Non-Designated Heritage Asset which accords with policy and is a positive material consideration in favour of the determination of the application.

TRANSPORT AND ACCESS

6.30 The NPPF (2023) supports a pattern of development which promotes the inclusion of sustainable transport with **Paragraph 115** stating that development should only be refused or prevented on highways if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

6.31 Appendix E 'Car Parking Standards' of the adopted Local Plan (2023) sets out the relevant parking guidance for new developments.

6.32 The Site has very good public transport accessibility. The nearest bus stop is to the West of the Site on Grandfield Avenue, this is located approx. 0.2 mile from the Site (5 minutes' walk). Railway Bridge bus stop, located to the East of the Site is also a short distance (5 minutes' walk). The nearest railway station is Watford Junction which is located approx. 0.4 mile from the Site (9 minutes' walk).

6.33 It should be noted that the proposed development will not place any additional pressure on local services or result in any increased movement to and from the Site.

6.34 Furthermore, no changes are proposed to the existing pedestrian access. Vehicular access will remain off Park Road and there are no changes proposed to the servicing of the Site.

6.35 The development proposes a horseshoe driveway to provide safe access and egress with associated boundary treatment and landscaping. We consider the proposed 'front garden' will enhance the overall appearance of the Site and restore the original character of Innage House. Overall, the development is considered acceptable in transport and access terms.

TREES, LANDSCAPE, ECOLOGY AND ENVIRONMENT

6.36 Part (g) of Policy HE7.2 'Designated Heritage Assets' notes the importance of preserving trees and other significant built and landscape features which contribute to the character and appearance of a conservation area or which provides a setting for local architectural heritage.

6.37 Policy NE9.1 'The Natural Environment' of the adopted Local Plan (2022) states development should protect and enhance Watford's natural and environmental assets and seeking to create new environmental features where possible. This includes protecting trees and encouraging native planting on new development.

- 6.38 There are several TPOs situated on the Site. The Arboricultural Report sets out the strategy for tree protection during the proposed works.
- 6.39 The Landscape Statement sets out the overarching aims to achieve high-quality landscaping surrounding the site. This strategy includes:
- Creating a large family sized back garden;
 - Creating a series of activity zones, filled with trees, mixed shrubs, and perennials that enhance the setting of the listed building, and improve biodiversity;
 - Creating a front garden featuring a horseshoe drive that follows the existing entrances to the property;
 - To minimize the impact on existing trees, a porous gravel surface that maintains the existing ground level is proposed;
 - Replacing the existing rotting wooden fence to a cast iron railing, more a fitting for a property within the conservation area;
 - Creating a vegetable garden to encourage home-grown produce in the interest of sustainability;
 - Retaining most of the existing trees, and enhancing their setting with new planting and trees; and
 - Proposing a mixture of native and non-native species to increase the resilience of the garden and ensure continuous colour and beauty throughout the year.
- 6.40 Furthermore, given that the proposals will not be developing a basement (as per the previously consented scheme 22/01484/FULH) we consider this will provide significant environmental benefits such as reducing noise, traffic and visual pollution as there will no below ground excavations.
- 6.41 As set out above, the Scheme proposes a comprehensive landscaping strategy throughout the Site which seeks to enhance the green infrastructure on the Site.

ENERGY AND SUSTAINABILITY

- 6.42 **Section 14** of the NPPF relates to 'Meeting the challenges of climate change, flooding and coastal change' and states that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, encourage the reuse of existing resources including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- 6.43 **Paragraph 159** of the NPPF states that new development should be planned for in ways that can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Paragraph 162 requires new development to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 6.44 **Policy QD6.2** 'Design Principles' of the adopted Local Plan (2022) states that "New developments will need to be designed to minimise their impact on the environment and embrace sustainability principles. This should include measures to reduce the use of resources including energy, water and waste, and incorporate soft measures to improve the environment such as green roofs, green walls and multi-functional green spaces".
- 6.45 **Policy CC8.2** 'Sustainable Construction Standards for Non-residential Development' of the adopted Local Plan (2023) states "Proposals should be designed to reduce their impact on the environment and create high-quality internal and external space for people to use. Proposals will be supported where it is demonstrated that resources will be used efficiently as part of the construction and operation of a building".
- 6.46 The Sustainability Statement demonstrates that the proposed development is targeting good standards of design and build-quality. Attention has been given to reducing the environmental impact throughout the lifetime

of the development. The proposed development meets the sustainability planning policy requirements, and the design team have carefully considered the Site's potential environmental impacts, which will be managed and mitigated in line with the relevant planning policies.

- 6.47 Measures to achieve this include prioritising recycled and reused materials reducing the demand for virgin resources and minimizing waste. Additionally, a high level of insulation will be incorporated into the new walls and roof, ensuring energy efficiency and reducing heat loss during the winter. The new fenestrations will be designed to optimize solar gains while minimizing heat loss.
- 6.48 The Proposed Development therefore seeks to incorporate a number of sustainable initiatives to ensure a high sustainable development is brought forward. The adoption of these initiatives will further ensure that the Proposed Development achieves the policy requirements set out above and as such is considered acceptable with regards to sustainability.

7.0 PLANNING BENEFITS AND PLANNING BALANCE

7.1 When assessed against the Development Plan as a whole, we consider the proposed development complies with planning policy and no adverse impacts will arise from this proposal. There is no net loss of residential floor space and the development provides a number of benefits including heritage benefits of great weight and a type of dwelling for which there is a demonstrated need.

7.2 The development proposes:

- Demolition of the existing conservatory and provision of a new enhanced conservatory given its existing poor condition
- Amalgamation of No. 43 and No. 45 to create a single family dwelling
- Internal alterations designed to meet the needs of a growing family
- Provision of high-quality landscaping and associated boundary treatment
- Re-provision of the original external façade of Innage House (pre-separation)

7.3 However, notwithstanding this should there be considered to be any policy conflict we consider that when applying the planning balance any harm (however limited) would be materially outweighed by the demonstrable planning benefits arising from the scheme that include:

- Provision of much needed large family housing to respond to local need as identified in the Local Housing Needs Assessment;
- Restoring the original historic use of Innage House by unifying the two dwellings;
- Removing superfluous front garden structures such as the shed at No. 45;
- Removing the plastic pipework from the front gable and replacing this with cast iron;
- Proposing alternative thermally efficient aluminium frame heritage windows as per the previously consented application reference 22/01484/FULH;
- Rationalising the boundary treatment and creation of a horseshoe driveway;
- Replacing the non-original door on the front elevation and steps adjacent to the main bay window of No. 45 with a smaller window to match the original;
- Soft landscaping at the front garden to soften and enhance the overall appearance of the Site and its contribution to the character of the Conservation Area;
- Mitigating environmental impacts such as traffic, noise and visual pollution by not creating a basement at No. 43;
- Recycling and reusing materials to maximise sustainability to reduce demand for virgin resources and minimise waste;
- New thermally efficient insulation will be incorporated into the new walls and roof to optimise solar gains while minimizing heat loss; and
- Providing a high-quality landscaping scheme that will secure biodiversity net gain and enhance the visual aesthetic of the site as well as its contribution to the character and appearance of the Conservation Area.

8.0 SUMMARY AND CONCLUSION

- 8.1 This Planning Statement has been prepared by Montagu Evans LLP to assist with the consideration and determination of an application for Full Planning Permission (“the Application”) on behalf of Ms Suzy Dean (“the Applicant”) for the “Demolition and replacement of the existing conservatory, amalgamation of no. 43 and no. 45 Park Road to create a single-family dwelling use class C3 as well as internal alterations, associated landscaping and boundary treatment” at the 43-45, Park Road, Watford, WD17 4QW (“the Site”).
- 8.2 The Site is located in the Nascot Conservation Area and comprises a Locally Listed Building ‘Innage House’. No. 43 and 45 Park Road are two storey semi-detached dwellings with vehicular access off Park Road. The Site is subject of an Article 4 Direction which removes permitted development rights under Schedule 2, Part 1, Classes A, C and D; and Part 2 Classes A and C of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).
- 8.3 Planning permission is sought for the amalgamation of No. 43 and No. 45 Park Road, Watford, WD17 4QW to create a single family dwellinghouse (Use Class C3) with associated boundary treatment and landscaping.
- 8.4 The description of development is as follows:
- “Demolition and replacement of the existing conservatory, amalgamation of no. 43 and no. 45 Park Road to create a single-family dwelling use class C3 as well as internal alterations, associated landscaping and boundary treatment”.*
- 8.5 The Site is located in Watford Borough Council (the “Council”). The Site extends approximately 0.21 ha. The location plan (ref: 0158_0001) at **Appendix 1** submitted as part of this application shows the Site in the context of the surrounding area. Full details on the Site and the surrounding area are set out in Section 3.0 of this statement.
- 8.6 The proposed development comprises of the following elements:
- Demolition of the existing conservatory and provision of a new enhanced conservatory
 - Amalgamation of No. 43 and No. 45 to create a single family dwelling
 - Internal alterations designed to meet the needs of a growing family
 - Provision of high-quality landscaping and associated boundary treatment
 - Re-provision of the original external façade of Innage House (pre-separation)
- 8.7 A suite of technical reports has been prepared and submitted as part of this planning application. The Planning Statement is one of those reports and provides a detailed planning policy assessment, considering the Proposed Development in the light of the relevant policies of the adopted Development Plan, as well as other material considerations.
- 8.8 The Planning Statement demonstrates that the Proposed Development:
- Is in accordance with relevant planning policy at national, regional and local level;
 - Would contribute positively to the delivery of housing, particularly large family housing of which there is an identified shortage in Watford;
 - Presents a high quality design which promotes sustainability measures throughout its design, construction and energy performance of the building;

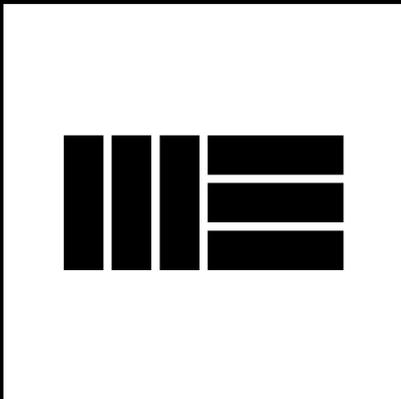
- Is in keeping with the character and appearance of the Conservation Area and results in an enhancement to the character and appearance of the conservation area which is a matter that should be accorded great weight;
- Proposes significant heritage benefits by bringing the original external façade of Locally Listed 'Innage House' back into the public view; and
- Delivers a comprehensive landscaping strategy throughout the Site which will offer biodiversity and ecological enhancements.

8.9 Having regard to the assessment undertaken within this Statement, we consider that the key planning benefits arising from this scheme can be summarised as follows:

- Provision of much needed large family housing to respond to local need as identified in the Local Housing Needs Assessment;
- Restoring the original historic use of Innage House by unifying the two dwellings;
- Removing superfluous front garden structures such as the shed at No. 45;
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- Soft landscaping at the front garden to soften and enhance the overall appearance of the Site and its contribution to the character of the Conservation Area;
- Mitigating environmental impacts such as traffic, noise and visual pollution by not creating a basement at No. 43;
- Recycling and reusing materials to maximise sustainability to reduce demand for virgin resources and minimise waste;
- New thermally efficient insulation will be incorporated into the new walls and roof to optimise solar gains while minimizing heat loss; and
- Providing a high-quality landscaping scheme that will secure biodiversity net gain and enhance the visual aesthetic of the site as well as its contribution to the character and appearance of the Conservation Area.

8.10 In summary, the proposed development is considered to be in accordance with both national planning policy guidance and the Development Plan when read as a whole. Thus, for the reasons set out above, we consider planning permission should be granted.

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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL