

**DEVELOPMENT MANAGEMENT COMMITTEE – 20 SEPTEMBER 2023**

<b>Application Number</b>	3/23/0440/FUL
<b>Proposal</b>	Reconfiguration of ground floor to provide 1 Class E (Commercial, Business and Service Uses) unit, change of use of first floor from Class E use to 8 studios and 1 one bedroom and 1 two bedroom self-contained flats, and associated external alterations, Creation of an additional second floor to create 2 studios, 6 one bedroom and 1 two bedroom self-contained flats, reconfiguration of car parking and provision of cycle parking, and other ancillary works.
<b>Location</b>	55 - 61 South Street and 2-4 Station Road, Bishop's Stortford, CM23 3AL
<b>Parish</b>	Bishops Stortford Town Council
<b>Ward</b>	Bishops Stortford Central

<b>Date of Registration of Application</b>	8 <sup>th</sup> March 2023
<b>Target Determination Date</b>	7 <sup>th</sup> June 2023
<b>Reason for Committee Report</b>	Major and S106
<b>Case Officer</b>	Diane Verona

**RECOMMENDATION**

That planning permission is **GRANTED**, subject the conditions set out at the end of this report and subject to a S106 legal agreement.

That delegated Authority is granted to the Head of Planning and Building Control to finalise the detail of the Legal Agreement and conditions.

**1.0 Summary of Proposal and Main Issues**

1.1 This is a full planning application which seeks planning permission for the reconfiguration of ground floor to provide 1 Class E (Commercial, Business and Service Uses) unit, change of use of first

floor from Class E use to 8 studios and 1 one bedroom and 1 two bedroom self-contained flats, and associated external alterations, Creation of an additional second floor to create 2 studios, 6 one bedroom and 1 two bedroom self-contained flats, reconfiguration of car parking and provision of cycle parking, and other ancillary works.

1.2 The main considerations in the determination of the application are:

- Whether the proposed uses are acceptable principle.
- Whether the proposed development is acceptable within a Conservation Area.
- Whether there is adequate provision of affordable housing.
- Whether the proposed development will provide satisfactory arrangements for pedestrian and vehicular access, a satisfactory level of car and cycle parking and has an acceptable impact on the local highway network.
- Whether the proposed development will provide an appropriate layout (which adequately addresses climate change), scale and appearance (including landscaping) and satisfactorily addresses flood risk and biodiversity net gain requirements.
- Whether the proposed development would have an acceptable impact on neighbouring amenity and provide a sufficient level of amenity for future occupiers.
- Whether overall, this is a sustainable form of development that is appropriate at this site, having regard to policies in the East Herts District Plan 2018, and the National Planning Policy Framework 2021.

## **2.0 Site Description**

- 2.1 The application site lies within the Town Centre and Primary Shopping Area of Bishop's Stortford, on the corner of South Street and Station Road. The site otherwise lies on a Secondary Shopping Frontage, within the Bishop's Stortford Conservation Area, and in an Area of Archaeological Significance. Furthermore, the site partially lies within Flood Zone 2
- 2.2 The building is in a prominent position, but currently does not contribute to the appearance of the surrounding area, being somewhat tired and dated in appearance, with painted brick facades at first floor, and a mismatch of shop fronts on the ground floor. The building currently provides Class E(a) and E(b) uses (formerly A1 and A3 uses).
- 2.3 The application site also falls within the Bishop Stortford All Saints, Central, South and part of the Thorley Neighbourhood Plan
- 2.4 It is noted that this application follows a refusal under reference 3/21/2418/FUL for the following reasons:
  - 1 The design, scale, bulk and massing of the proposal would have an adverse effect on the character and appearance of the Bishop Stortford Conservation Area contrary to policies HA1 and HA4 of the East Herts District Plan 2018.
  - 2 Insufficient information has been provided to illustrate that the proposed development would enhance biodiversity and create opportunities for wildlife, through the submission of an up-to-date ecological survey, contrary to Policy NE3 of the East Herts District Plan 2018.
  - 3 Insufficient information has been provided to demonstrate how the proposed development would mitigate and/or adapt to climate change contrary to Policies CC1 and CC2 of the East Herts District Plan 2018.

- 4 The scheme fails to provide a mix of sizes of units to support the provision of a mixed and balanced community and is therefore contrary to policy HOU1 of the East Herts District Plan 2018
- 5 In the absence of a legal agreement in regard to the provision of Planning Obligations the proposal is contrary to policy HOU3 of the East Herts District Plan 2018
- 6 The layout of first floor units Nos. 05, 06, 07 and 08 and units 08 and 09 on the second floor would result in a restricted internal floorspace. Second floor units 08 and 09 face directly onto the shared internal courtyard which would result in loss of both outlook and privacy. As such, the proposal is contrary to policy DES4.

### 3.0 Planning History (Recent)

Application Number	Proposal	Decision
3/19/0742/FUL	Retention of Class A1 unit (part ground and first floors), reconfiguration and change of use to create 2 no. units with flexible permission for Classes A1/A2/A3 (part ground floor) and 1 no. unit with flexible permission for Classes B1/D1/D2 uses (part ground and first floors) and associated external alterations. Construction of a second floor to create 1 no. 2-bedroom and 8 no. 1-bedroom self-contained flats, reconfiguration of car parking and provision of cycle parking, and other ancillary works	Granted with conditions 28.08.2019

3/19/2422/FUL	Change of use of 2no. class A1 units (both at part ground and part first floor levels) and 2no. class A3 units (one at part ground and one at part first floor level) to class B1 (offices) with associated external alterations; creation of second floor for class B1 (offices), together with roof terrace and plant, reconfiguration of existing car parking and provision of cycle parking and other ancillary works	Granted with Conditions 29.01.2020
3/21/2418/FUL	Reconfiguration of ground floor to provide 1 Class E (Commercial, Business and Service Uses) unit. Change of use of first floor from Class E use to Class C3 for 10 studios and 1no. 1-bedroom self-contained flat and associated external alterations. Addition of a second floor to create 2 studios, 5no. 1-bedroom and 2no. 2-bedroom self-contained flats. Reconfiguration of car parking and provision of cycle parking and other ancillary works	Refused 09.12.2022

#### 4.0 **Main Policy Issues**

- 4.1 The main policy issues relate to the relevant planning policies in the East Herts District Plan 2018 and the National Planning Policy Framework 2021 (NPPF) as set out below.

<b>Main Issue</b>	<b>NPPF</b>	<b>East Herts District Plan</b>
Principle of Development	Chapter 2, 4, 6, 7, 11	INT1, DPS1, DPS2, DEL1, DES1, ED1, RTC1, RTC3

Layout, Scale, Appearance, Landscaping	Chapter 8, 11, 12, 15	DES1, DES3, DES4, DES5, NE3, HA1, HA4, HOU1, HOU7
Highway Impacts	Chapter 9	TRA1, TRA2, TRA3,
Impact on Amenity	Chapter 4, 12	DES2, DES3, DES4, EQ1, EQ2, EQ3, EQ4
Energy, Sustainability and Drainage	Chapter 14	CC1, CC2, WAT5, WAT6

Other relevant issues are referred to in the 'Consideration of Relevant Issues' section below.

## **5.0 Summary of Consultee Responses**

- 5.1 EHDC Conservation and Urban Design: No objection subject to conditions and informatives.
- 5.2 EHDC Environmental Health (Noise):
- 5.3 EHDC Environmental Health (Air and Land): No objection subject to conditions
- 5.4 Thames Water: No objection, subject to conditions and informatives to address surface water disposal.
- 5.5 HCC Growth and Infrastructure: has advised that they will be seeking non – transport financial contributions as shown in Section 10 of this report
- 5.6 HCC Highway Authority: No objection, subject to conditions and informatives
- 5.7 HCC Lead Local Flood Authority: No objection subject to conditions.
- 5.8 EHDC Archaeology: No objection as in this instance it is considered that the development is unlikely to have a significant impact on

heritage assets of archaeological interest, and I have no comment to make upon the proposal.

5.9 Waste and Recycling No objection subject to conditions

5.10 HCC Minerals and Waste: No objection subject to conditions

5.11 EHDC Landscape: Further information required however, this could be secured by condition

5.12 HCC Ecology: No objection subject to conditions

5.13 (Note: EHDC, East Herts District Council; HCC, Hertfordshire County Council)

## **6.0 Town/Parish Council Representations**

6.1 The Committee object to the application as it is detrimental to the street scene and unduly prominent. It also contravenes HA1 and HA4 of the District Plan.

## **7.0 Summary of Other Representations**

7.1 85 neighbouring properties have been consulted by letter. The application has been publicised by site notice and press advert. 2 letters have been received in response: 2 objecting.

7.2 The 2 letters of objection raised the following issues:

- It is detrimental to the street scene. Pavements are narrow, it is too high and will create too much traffic not just in construction but afterwards on a corner where there are multi-set traffic lights.
- It is unduly prominent and far too high to be in keeping with the market Town aesthetic that it sits amongst
- It contravenes policies HA1 and HA4 of the District Plan

- The town has created an over-supply of flats many of which remain mid-construction or empty. E.G., at the train station, on Hadham Road. Creating more is very bad planning. In addition, what is the quality of the studios and who are they for? They should be of a good standard and they are too small to be so. We are already seeing an increase in Anti-social behaviour and low level crime which has coincided with the mass building developments, and we have the YMCA at the other end of town which has permanent detritus, broken windows and a smell of weed (I walk past it every day on the school run.) We should not replicate this at the other end of town,
- There is already substantial expansion in this area of similar properties by the station and within the town as a whole. The infrastructure around this property is poor, the pavements are narrow and busy which will add to the hazards already having to be negotiated whilst out and about, to pass someone on the street you frequently have to walk into the road to allow enough considerate space to walk by. Vehicles arriving and leaving this property will add to these hazards and create dangerous access problems. There are problems with water pressure in this area, additional dwellings will add to the complications this is causing. This proposal will therefore add stress to an already fragile infrastructure.
- The creation of an additional second floor is not necessary and is not designed as in keeping with the historic market town. The elevation of this second floor will be intrusive and overlook my property and will take away the uninterrupted light I have. My privacy will also be taken away.
- I brought my property as a quiet retirement home, not a home in which I will feel intimidated in by the 2nd floor glaring into my property, nor a home where I want to hear the noise of and see the disruption of building work being carried out.



## **8.0 Consideration of Issues**

### Principle

- 8.1 Policy DPS2 (The Development Strategy 2011-2033) of the East Herts District Plan outlines that the strategy of the Plan is to deliver sustainable development in accordance with a hierarchy of sites. In this regard, preference is given to sites within the urban areas of Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth and Ware. As this is a site in Bishop's Stortford and in a sustainable location within the Town Centre, the principle of the development accords with policy DPS2.
- 8.2 The application site lies within the built-up area of Bishop's Stortford, whereby in principle, there is no objection to development. The Vision and Strategic Objectives within the District Plan support the provision of retail and other main town centre uses within the Primary Shopping Area of Bishop's Stortford, whilst Secondary Shopping Frontages should seek to retain main town centre uses or those which will support the vitality and viability of the frontage or town centre as a whole. The provision of C3 Residential uses which are considered to be a main town centre use together with the provision of a unit within Use Class E within the Secondary Shopping Frontage is considered to be acceptable. As such the proposal accords with Policies RTC1 and RTC3
- 8.3 As such the principle of development is acceptable provided that the proposal accords with all other relevant policies. Consequently, further consideration will be given to the effect on the Bishops Stortford Conservation Area, the amenities of neighbouring properties, future occupiers, the provision of parking and any other highway considerations, with reference to Policies DES4, HA1, HA4, TRA1, TRA2 and TRA3.
- 8.4 A recent appeal decision concluded that the Council cannot currently demonstrate a five year supply of deliverable housing sites. The consequence of not having a 5YHLS is that the 'tilted balance' is engaged in the decision-making process. The tilted

balance refers to paragraph 11(d) of the NPPF which states that if the most relevant Local Plan policies for determining a planning application are out of date (such as when a 5YHLS cannot be demonstrated), the application should be approved unless the application of NPPF policies that protect areas or assets of particular importance (as defined by the NPPF) provide a clear reason for refusing permission or the harm caused by the application significantly and demonstrably outweigh its benefits, when assessed against policies of the NPPF as a whole. In this context, the policies considered to be out of date include in particular those relating to the development strategy and delivery of housing which are referred to in this report.

### Housing Mix and Affordable Housing

- 8.5 Policy HOU1 sets out the Council's approach to housing mix and policy HOU3 sets out its approach to affordable housing. They state, in summary, that proposals should provide a mix of sizes of units to support the provision of mixed and balanced communities, and that affordable housing should be provided on "major" schemes (those over 10 units), unless a viability assessment indicates that the scheme cannot support this provision.
- 8.6 As such, and as set out in the submitted FVA, local character is a key consideration as it must not be the Plan's intention that each development contains the full range of housing types specified in the SHMA – the overall housing mix policy is expected to be delivered through a higher proportion of smaller units in urban centre developments and larger homes where these are appropriate to the local character and where the market expects them to be.
- 8.7 A total of 19 residential units are proposed; the breakdown of which is outlined below:

100% Market housing

Type	Number	% Provided
One bed flat	7	36.84
Two bed flat	2	10.53
Studio	10	52.63
Total	19	

- 8.8 19 flats are proposed with a range of dwelling sizes from studio to 1 and 2 bedroom units. This is considered to be an appropriate mix for a scheme of this nature.
- 8.9 The 2015 expectation is that the East Hertfordshire District has a need for 1,520 market flats to be delivered over a 22-year period between 2011 and 2033, of which 47% are to be 1-bedroom units and 53% 2 bedrooms or more.
- 8.10 These are expected to be delivered in locations that suit the type and size, as confirmed in paragraph 5.94 of the SHMA (2015), which states: "Of course, the spatial distribution of housing provision will be determined through the planning process, which will also consider the most appropriate location for market and affordable housing, and the type and size of properties to be provided in different areas."
- 8.11 The proposal provides no affordable housing and a Financial Viability Assessment has been provided which sets out the expected costs and revenues to the scheme and justifies the nil provision.
- 8.12 The provision of affordable housing in an important policy requirement and an element of the "planning balance" which needs to be arrived at on schemes. The District has a significant waiting list of people needing accommodation and schemes should be making their contribution to them. The District Plan was adopted following a rigorous assessment of affordable housing need and whether the policies contained in the plan were appropriate to ensure that this could be met, without bringing the overall delivery of the plan in to question or stymieing growth and development. The Plan was therefore adopted, with a requirement for 40% affordable housing

on major sites, but with an acknowledgement that some sites may not be able to meet this and so in those instances a viability assessment could be provided.

- 8.13 Officers consider that it is a reasonable position that this scheme provides no affordable housing. The proposal is extensively a conversion and reconfiguration of an existing building, which has significant additional costs associated with it, whilst in some cases units would attract a sub-optimal market value due to their arrangements and need to preserve the existing fabric. The new build elements of the scheme on the additional second floor would not have these constraints, but the project needs to be considered as a whole from a viability perspective and some issues, such as more complex construction on a tight site, apply to both elements of the scheme.
- 8.14 In assessing the overall viability of the scheme, regard needs to be had to the financial contributions which the scheme will require, which are in the order of approximately £98,000 (and are detailed at the end of the report). Officers, therefore, are satisfied that the scheme cannot support the provision of affordable housing.
- 8.15 Consideration has been given to whether an “upwards only” financial review mechanism (where the viability of the scheme is re-assessed prior to commencement of development) should be used. This mechanism would allow for the viability to be re-tested when the scheme is commenced and affordable housing secured at a later date if the scheme can support it then. A pre-commencement review mechanism is included in the recommendation.

#### Design layout, heritage, character and appearance

- 8.16 Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 places a statutory duty on the Council to give special regard to the desirability of preserving Listed buildings, their settings and historic interest. Section 72 places a similar duty to have special regard to the desirability of preserving or enhancing the character of a Conservation Area. Paragraph 130 of the NPPF

seeks development that will function well and add to the quality of the area, are visually attractive and include appropriate landscaping.

- 8.5 Policy DES4 of the District Plan advises that development proposals must be of a high standard of design and layout to reflect and promote local distinctiveness.
- 8.6 Policy HA4 of the District Plan advises that new development, extensions and alterations to existing buildings in Conservation Areas will be permitted provided that they preserve or enhance the special interest, character and appearance of the area. Development proposals outside a Conservation Area which affect its setting will be considered likewise.
- 8.7 The proposed development comprises the refurbishment of the existing facades, and a vertical extension to the building to provide an additional (new second) floor. The site lies on a prominent location on the corner of South Street and Station Road. However, it is noted that there are other three and four storey properties along South Street and Station Road, including Bridge House opposite the site on South Street, Archer Place and 45-47a South Street. Riverside Wharf, which lies some 35 metres to the east on the opposite side of Station Road measures approx. 20 metres in height and includes 5.5 storey elements. As such, the addition of a further storey will not be out of keeping with the surrounding area. Furthermore, on the South Street elevation and angled elevation on the corner, the second floor is proposed to be stepped back, which will reduce the prominence of the proposal where the views are most readily available in the high street.
- 8.8 The Council's Conservation and Urban Design officer requested a number of amendments to the original scheme which have now been addressed and the appropriate changes made.
- 8.9 Revised plans have been submitted which include further justification for the lack of a step-back on the second floor of the Station Road façade. The consultant engineer confirmed that the extension proposals will have to be supported on the existing

structural grid of columns that form the principal frame to the existing building. Whilst the existing structural grid of columns is set back into the building on the South Street elevation, it is within the side elevation on Station Road. Therefore, on this side the consultant engineer states in their view that the second-floor elevation will need to be on the line of the existing ground floor elevation

- 8.10 The structural constraints will result in a less successful frontage on Station Road however, it is deemed that the articulation of the design and materials on the second floor will help to mitigate the solidity of the form to an acceptable level.
- 8.11 As requested by the C and UD team, the corner windows to the first and second floor have been amended, the spacing of first floor windows on the Station Road elevation have been revisited and the blocked window at ground floor level on the eastern elevation has been reopened. The fenestration is now satisfactory.
- 8.12 Details and specification of all external materials can be submitted for approval by condition, as requested by the applicant. Opportunities to unify the appearance of the three levels of the façades should be sought through the specification of materials. For instance, the proposed bricks for the second floor should closely match the existing ground floor brickwork and matching finishes should be chosen for different metal elements such as shopfronts, windows and balustrades. In addition, the design of the exposed channel above the first and second floor should be coordinated in terms of height, materials or finishes.
- 8.13 The photovoltaic panels proposed at roof level should be hidden from view within the conservation area behind the proposed parapet. Detailed information on the layout of the proposed panels including sections and elevation showing their height in relation to the parapet should be provided for approval by condition.

## **Transport considerations**

- 9.4 Chapter 9 of the NPPF seeks to promote sustainable transport; this includes ensuring that opportunities to promote walking, cycling and public transport use are identified and pursued.
- 9.5 Paragraph 105 of the NPPF encourages the location of significant development in locations that either are or can be made sustainable through limiting the need to travel. Paragraph 110 of the NPPF requires, amongst other things, that consideration is given to ensuring that safe and suitable access to the site can be achieved for all users and that any significant impact from the development on the transport network (capacity and congestion) or on highway safety can be cost effectively mitigated to an acceptable degree.
- 9.6 Paragraph 111 of the NPPF advises that development should only be refused on transport grounds if there would be an unacceptable impact on highway safety, or where the residual cumulative impacts of development would be severe.
- 9.7 The site is located in the town centre of Bishop's Stortford and currently comprises a 2 storey commercial premises providing retail and commercial floorspace over ground and first floor levels. It is served by an existing shared access from Station Road. The applicant has indicated that there are no changes to the existing access, and they are proposing parking for staff only for the commercial land use. They have stated that there will be no access for large service vehicles to the site and refuse collection will be from Station Road as existing. There is a slight concern however about access for smaller service vehicle such as supermarket delivery vans at circa 6.5m in length. The access is gated, and there are 'no-waiting' restrictions outside the site.
- 9.8 This proposal has been considered and it is acknowledged that the site is in a sustainable location well served by public transport and pedestrian footways. The applicant has proposed 24 cycle spaces indicated on drawing ref: PL0009 and this is acceptable. There are double yellow lines on the surrounding public highway and a bus

stop outside of the site. Due to the site being in the town centre which comprises a heavily trafficked area as well as being used by pedestrians for accessing the town centre, the Highway Authority has recommended a condition and highway informatives in the interest of highway safety and to minimise the impact of construction vehicles on the surrounding public highway.

#### Neighbour amenity

- 9.9 There are a number of properties which lie adjacent to the site or share a boundary with the existing building. However, due to the layout of the surrounding area and buildings, and the uses of the surrounding buildings, it is not considered that the proposed development would result in unacceptable harm to any neighbouring properties in terms of loss of light, any overbearing impact, or a loss of privacy or similar. As such, the proposal accords with DES4 in this regard.

#### Amenity of future occupiers

- 9.10 Various policies in the District Plan require that a satisfactory living environment is provided for future occupiers. Policy DES4 requires that schemes are well designed and meet the needs of future occupiers and policies EQ1 and 2 require that land contamination and noise pollution is acceptable.
- 9.11 On the first floor the 8 no. studio flats range between 37.5 and 48.6 sqm, the 1 no. 1B2P is 51 sqm and the 1 no. 2B3P apartment is 68.3 sqm. On the second floor the 2 no. studios are between 37 and 42.5 sqm. The 6 no. 1B2P apartments between 53 and 61 sqm and the 1 no. 2B3P apartment is 61.4 sqm.
- 9.12 The government has published, through its Technical Housing Standards, the "Nationally Described Space Standards" which set out internal space requirements for new residential units. The following table sets out an assessment against these:



Unit	Size	NDSS Requirement	Proposed Floorspace	Conversion/ New Build
First Floor				
1	Studio	37*/39m <sup>2</sup>	40.5m <sup>2</sup>	Conversion
2	Studio	37*/39m <sup>2</sup>	37.7m <sup>2</sup>	Conversion
3	1B2P	51m <sup>2</sup>	51m <sup>2</sup>	Conversion
4	Studio	37*/39m <sup>2</sup>	38m <sup>2</sup>	Conversion
5	Studio	37*/39m <sup>2</sup>	48.6m <sup>2</sup>	Conversion
6	Studio	37*/39m <sup>2</sup>	45.4m <sup>2</sup>	Conversion
7	2B3P	61m <sup>2</sup>	68.3m <sup>2</sup>	Conversion
8	Studio	37*/39m <sup>2</sup>	37.1m <sup>2</sup>	Conversion
9	Studio	37*/39m <sup>2</sup>	38.1m <sup>2</sup>	Conversion
10	Studio	37*/39m <sup>2</sup>	37.5m <sup>2</sup>	Conversion
Second Floor				
1	Studio	37*/39m <sup>2</sup>	42.5m <sup>2</sup>	New Build
2	Studio	37*/39m <sup>2</sup>	37m <sup>2</sup>	New Build
3	2B3P	61m <sup>2</sup>	61.4m <sup>2</sup>	New Build
4	1B2P	51m <sup>2</sup>	56.3m <sup>2</sup>	New Build
5	1B2P	51m <sup>2</sup>	53m <sup>2</sup>	New Build
6	1B2P	51m <sup>2</sup>	55m <sup>2</sup>	New Build
7	1B2P	51m <sup>2</sup>	61m <sup>2</sup>	New Build
8	1B2P	51m <sup>2</sup>	59.7m <sup>2</sup>	New Build
9	1B2P	51m <sup>2</sup>	61m <sup>2</sup>	New Build

\* Where a 1b1p (Studio) has a shower room instead of a bathroom, the floor area may be reduced from 39m<sup>2</sup> to 37m<sup>2</sup>, as shown bracketed

- 9.13 As can be seen, the majority of units meet and, in some instances, comfortably exceed the minimum required floorspace. On balance this is considered acceptable.
- 9.14 Beyond the proposed floor areas, all units are provided with acceptable light and outlook, with habitable rooms facing towards the north, east or west. The converted buildings on the first floor face onto the communal amenity area
- 9.15 Units 1, 2 and 3 of the new build on the second floor are provided with private amenity areas on the west elevation in the form of

balconies. All the new build flat face onto an internal courtyard which will be the shared amenity space.

- 9.16 A condition will be imposed to ensure that the new residential units comply with the building Regulations requirement M4 (2): category 2 – Accessible and Adaptable Dwellings. Similarly, a condition is recommended relating to land contamination based on advice from Environmental Health.

#### Flood risk and drainage

- 9.17 The application site lies within Flood Zone 2. The proposed commercial uses are considered “less vulnerable” in flooding terms and residential uses “more vulnerable”. These uses are considered acceptable in these flood zones where supported by a Flood Risk Assessment (FRA) which demonstrates that a development can be made safe. Measures in the submitted FRA are acceptable in principle, subject to conditions to secure the detail.
- 9.18 Based on the Flood Risk Assessment and Design and Access Statement submitted with the application, the proposed conversion will not require any external changes as the building roof area will not increase. Recognising the above, it is understood that there will be no new impermeable drained areas proposed as part of the proposed development, nor changes to the existing surface water drainage system. Therefore, proposals are unlikely to impact the flood risk and drainage. It is recommended that it be considered if there could be an inclusion of rainwater reuse (or harvesting in the building) and/or a green roof as would be beneficial to the overall long term sustainable use of water and flood resilience of the building.
- 9.19 In this regard, subject to the conditions suggested by the Lead Flood Authority, the proposal would not conflict with the NPPF or Policies WAT1 and WAT5 of the East Herts District Plan 2018

## Landscaping

- 9.20 The Planning Statement says that the rear courtyard will be repaved and resurfaced with 9 parking spaces reinstated and to include new landscaping around the new parking courtyard together with the provision of 24 cycle parking spaces.

The proposed Site/Roof Plan Drwg PL008 shows an indicative layout but no meaningful hard or soft landscape details neither does DrwgPL009 REV A.

Consequently, it is recommended that a suitable hard and soft landscape condition be attached to any grant of planning permission and this to be discharged prior to commencement of the construction phase.

## Ecology and Biodiversity

- 9.21 A Preliminary Ecological Assessment (PEA) and Preliminary Roost Assessment together with a Biodiversity Net Gain Assessment (BNG) were submitted with the application both prepared by Arbtech Consulting Ltd, both dated 13th January 2023.
- 9.22 The PEA shows that there are no suitable places for roosting bats within the site or any habitat for other protected species.
- 9.23 The BNG concludes that the baseline value of the site is 0 units comprising developed land: sealed surface and a very small area of bramble scrub. The post development habitat value of the site is 0.05 units comprising the retained building and car park and the creation of mixed shrub planting. The results in a net change in biodiversity of 286% which is a significant gain.
- 9.24 The site is a modern, flat roofed building surrounded by roads and car park hardstanding in the middle of Bishops Stortford. It has no ecological interest.

There is an insignificant likelihood of bats, although some similar buildings can provide opportunities in certain situations.

The Preliminary Ecological Appraisal found no habitats or features of importance. One boundary has scattered bramble. The PEA also includes a Preliminary Roost Assessment of the main Building B1 which was assessed as being of negligible value, which officers have no reason to doubt. Two bat boxes are recommended, although the site does not offer any foraging opportunities and the location is unlikely to attract bats. However, the River Stort corridor is quite close to the east and such features could be of potential value if otherwise absent from this highly urbanised area.

The PEA concludes that there are no existing nesting opportunities for birds, although bird boxes are recommended.

A Biodiversity Net Gain of 288% has been calculated, which is welcomed. This is consistent with Policies NE1, NE2 and NE3. This is significant BNG but has to be seen in the context of the site – which is currently is effectively devoid of any habitat other than bare concrete. When BNG is a legal requirement, the full metric spreadsheet must be submitted to enable proper scrutiny of the assessments.

Despite the comprehensive lack of ecological interest, the applicant is commended in seeking to enhance the site's ecological value. A landscaping scheme will be needed as a condition of approval to demonstrate how the BNG is to be provided on site. There are no ecological constraints and the application can be determined accordingly.

- 9.25 Subject to the above it is considered that the development complies with Policy NE3 of the District Plan.

### Air Quality

- 9.26 Policy EQ4 requires that all developments include measures to minimise air quality impact with reference to the design, construction and operation of developments.
- 9.27 The Council's Environmental Health officer has assessed the proposal and is satisfied with the conclusions of the odour assessment provided. Whilst it is likely some odour will be experienced this will be of a level in keeping with the nature of the area and not assessed to be at such a level as to be deemed a statutory nuisance.

### Climate Change and sustainability

- 9.28 Paragraph 154 of the NPPF and Policy CC1 of the District Plan requires that development proposals introduce measures that address climate change.
- 9.29 Policy CC2 of the District Plan states that all new developments should demonstrate how carbon dioxide emissions will be minimised across the development site, taking account of all levels of the energy hierarchy. Achieving standards above and beyond the requirements of Building Regulations is encouraged.
- 9.30 Carbon reduction should be met on-site unless it can be demonstrated that this is not feasible or viable. In such cases effective offsetting measures to reduce on-site carbon emissions will be accepted as allowable solutions.
- 9.31 The energy embodied in construction materials should be reduced through re-use and recycling, where possible, of existing materials and the use of sustainable materials and local sourcing.
- 9.32 Proposals should be designed in an energy efficient way that results in a reduction in carbon emissions. This will ensure that highest standards of sustainable design and construction are achieved.

- 9.33 The application has been submitted together with a Sustainable Construction, Energy and Water Statement outlines how the proposed development seeks to achieve a CO2 emission reduction target of 52% using SAP12 carbon factors when compared to Building Regulations compliant building. These are the standards that are set out in the District Plan which generally seek to achieve standards above the Building Control Regulations. Various other sustainability measures are outlined above in other sections within the Statement on flood risk, air quality, trees and ecology.
- 9.34 In conclusion, it is considered that, subject to a condition to secure the measures proposed, the proposal is in accordance with Policies CC1 and CC2 of the East Herts Local District Plan 2018.

#### Response to third party comments

Responses to the comments have been addressed within the body of this report.

### **10.0 Legal Agreement**

- 10.1 The following planning obligations are sought to support/mitigate the impacts of the development proposed:
- “Upward only” financial review mechanism to secure an analysis of scheme viability near to commencement of development so as secure affordable housing (or contribution in lieu of affordable housing) should the scheme’s viability improve.
  - Monitoring Fees – HCC will charge monitoring fees. These will be based on the number of triggers within each legal agreement with each distinct trigger point attracting a charge of £340 (adjusted for inflation against RPI 1Q2021). For further information on monitoring fees please see section 5.5 of the Guide to Developer Infrastructure Contributions.
  - Primary Education towards the delivery of a new primary school in the area and/or provision serving the development (£42,275

(which includes land costs of £841) index linked to BCIS 1Q2022).

- Secondary Education towards the expansion of Bishop's Stortford High School and the Hertfordshire and Essex High School and/or provision serving the development (£37,385 index linked to BCIS 1Q2022).
- Special Educational Needs and Disabilities (SEND) towards the delivery of new Severe Learning Difficulty (SLD) special school places (EAST) and/or provision serving the development (£4,944 index linked to BCIS 1Q2022).
- Library Service towards the delivery of a new centre at Bishop's Stortford and/or provision serving the development (£3,623 index linked to BCIS 1Q2022).
- Youth Service towards increasing the capacity of Bishop's Stortford Young People's Centre and/or provision serving the development (£433 index linked to BCIS 1Q2022).
- Waste Service towards Bishop's Stortford Recycling Centre and/or provision serving the development (£278 index linked to BCIS 1Q2022).
- Waste Service Transfer Station towards the new Eastern Transfer Station and/or provision serving the development (£2,003 index linked to BCIS 3Q2022).
- Fire and Rescue Service towards new fire station provision at Bishop's Stortford or provision serving the development (£7,231 index linked to BCIS 1Q2022).
- Allotments - £2,363
- Bowls - £3,218
- Children's Play and Provision for Young People - £28,691

- Fitness Gyms - £3,399
- Natural and Semi Natural Green Space - £5,545
- Outdoor Tennis - £2,205
- Parks and Gardens and Amenity Green Space - £13,172
- Sports Halls - £7,649
- Studio Space - £1,404
- Swimming Pool - £7,821
- Village and Community Centres - £9,258

## **11.0 Planning Balance/Conclusion**

- 11.1 A key objective of the planning system is to bring forward development that is appropriate and in the right place. This is made clear in the National Planning Policy Framework (NPPF), which states that there should be a presumption in favour of sustainable development.
- 11.2 The proposed scheme has been fully assessed in relation to its impact on heritage assets and the Council's Conservation officer has concluded that proposal will improve the appearance of the existing vacant building.
- 11.3 The proposal will result in the provision of an additional 19 residential units within an area assigned for residential development, as well as appropriate ground floor uses. The lack of provision of affordable housing is acceptable in this case and outweighed by the scheme bringing back in to use the existing building.



- 11.4 The proposed use will result in an increase in vehicle numbers and movements at the site however, the number of designated vehicle parking spaces will be reserved for the staff of the ground floor commercial unit only. The vehicular movements at and around the site has been assessed and it is considered that it will not adversely affect the free flow of traffic.
- 11.5 In relation to other matters the proposal is not considered to adversely affect residential amenity, will adequately deal with climate change in the design aspects of the scheme and will result in an uplift in ecological and landscape enhancement and will not increase the risk of flooding.
- 11.6 Overall, on the balance of considerations the scheme is considered to be of good design quality and a sustainable form of development.

## **12.0 Recommendation**

- 12.1 That planning permission is **GRANTED** subject to the satisfactory completion of a legal agreement and the conditions set out at the end of this report.
- 12.2 That delegated authority is granted to the Head of Planning and Building Control to finalise the Legal Agreement and conditions.

## **Conditions**

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

Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 (As Amended).

2. The development hereby approved shall be carried out in accordance with the approved plans and documents listed at the end of this Decision Notice.

Reason: To ensure the development is carried out in accordance with the approved plans, drawings, documents and specifications.

3. Prior to any above ground construction works being commenced, details of the layout of the proposed photovoltaic panels, including sections and elevation showing their height in relation to the parapet, shall be submitted to and approved in writing by the Local Planning Authority, and thereafter the development shall be implemented in accordance with the approved details.

Reason: In the interests of amenity and good design in accordance with Policy DES4 of the East Herts District Plan 2018

4. No development shall commence until a Construction Management Plan (or Construction Method Statement) has been submitted to and approved in writing by the Local Planning Authority, including elements of the CLOCS standards as set out in the Highway Authority's Construction Management template. Thereafter the construction of the development shall only be carried out in accordance with the approved Plan: The Construction Management Plan / Statement shall include details of:
  - a/. photographic condition survey of public carriageways, verges and footways in the vicinity of the site,
  - b/. routing of construction vehicles to/from the site,
  - c/. access arrangements to the site (inclusive of signage),
  - d/. programme of works (Work programme and/or timescale for each phase of construction works),
  - e/. the estimated number, type and routing of construction vehicle per day/week;
  - f/. traffic management requirements (including details of any vehicle holding area, details of the vehicle call up procedure),
  - g/. construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas),
  - h/. siting and details of wheel washing facilities, cleaning of site entrances, site tracks and the adjacent public highway,

- i/. timing of construction activities (including delivery times and removal of waste) and to network peak times,
- j/. provision of sufficient contractors, staff and visitors on-site parking prior to commencement of construction activities,
- k/. details of measures to protect pedestrians and other highway users from construction activities on the highway,
- l/. coordination with other development projects in the vicinity,
- m/. details of measures and training to reduce the danger posed to cyclists by HGVs, including membership of the Freight Operators Recognition Scheme or an approved equivalent,
- n/. where works cannot be contained wholly within the site a plan should be submitted showing the site layout on the highway including extent of hoarding, pedestrian routes and remaining road width for vehicle movements. The applicant is advised to use HCC's Construction Management Plan template, which can be tailored to the scale of the development can be found here: <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx> or by telephoning 0300 1234047

Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way in accordance with Policies 5, 12, 17 and 22 of Hertfordshire's Local Transport Plan (adopted 2018).

5. No development shall commence until a Parking, Delivery, Servicing and Emergency Vehicle Management Plan has been submitted to and approved in writing by the Local Planning Authority, in consultation with the Highway Authority, to illustrate how vehicle and cycle parking, servicing, deliveries, and emergency vehicle access associated with the development will be operated and managed. The Plan must be implemented and adhered to in full thereafter.

Reason: To ensure all vehicles accessing and using the site do so safely and conveniently, causing no conflict with other vehicles or site users.

6. No development shall take place until a Site Waste Management Plan (SWMP) for the site has been submitted to the Local Planning Authority and approved in consultation with the Waste Planning Authority. The SWMP should aim to reduce the amount of waste being produced on site and should contain information including estimated and actual types and amounts of waste removed from the site and where that waste is being taken to. The development shall be carried out in accordance with the approved SWMP.

Reason: This is a pre-commencement condition to promote sustainable development and 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 12 of the Hertfordshire Waste Core Strategy and Development Management Policies Development Plan Document (2012).

7. Prior to the commencement of development, full details of the on-site storage facilities for waste including waste for recycling shall be submitted to and approved in writing by the local planning authority. Such details shall identify the specific positions of where wheeled bins, will be stationed and walk distances for residents including the specific arrangements to enable collection from the kerbside of the adopted highway/ refuse collection vehicle access point or within 10m. The approved facilities shall be provided prior to the commencement of the use hereby permitted and shall be retained thereafter unless alternative arrangements are agreed in writing by the local planning authority.

Reason: To protect the amenities of nearby residents/occupiers and in the interests of visual amenity.

8. Any gas-fired boiler shall meet a minimum standard of <40 mgNO<sub>x</sub>/kWh

Reason: In order to ensure an adequate level of air quality for residents of the new dwellings in accordance with policy EQ4 Air

Quality of the adopted East Herts District Plan 2018 and in line with the East Herts Sustainability SPD and IAQM Guidance 2017

9. In connection with all site preparation, demolition, construction, conversion and ancillary activities, working hours shall be restricted to 08:00 - 18:00 hours on Monday to Friday, 08:00 - 13:00 hours on Saturdays, and not at all on Sundays or Bank / Public Holidays. Vehicles arriving at and leaving the site must do so within these working hours.

Reason: In order to ensure an adequate level of amenity for nearby residents in accordance with Policy EQ2 Noise Pollution of the adopted East Herts District Plan 2018.

10. Best Practicable Means (BPM) shall be used in controlling dust emissions during all site preparation, demolition, construction and ancillary activities.

Reason: In order to ensure an adequate level of amenity for nearby residents in accordance with Policy EQ4 Air Quality of the adopted East Herts District Plan 2018.

11. The development shall be undertaken in accordance with two documents. Firstly, the Flood Risk Assessment, prepared by Cole Easdon, ref SST/csp/8267ehdc, dated 19 January 2023. Secondly the Agent Response to LLFA, prepared by Cole Easdon, subject ref 55 - 61 South Street And 2-4 Station Road - 3/23/0440/FUL (8267), dated 31 May 2023. Unless otherwise submitted and approved in writing with the Local Planning Authority. The works shall be fully implemented in accordance with the approved scheme before the development is brought into use, or as set out in the approved phasing details.

Reason: To prevent flooding in accordance with National Planning Policy Framework paragraph 167, 169 and 174 by ensuring the satisfactory management of local sources of flooding surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates

as designed for the lifetime of the development.

12. Upon completion of the drainage works for the site in accordance with the timing/phasing arrangements, the following must be submitted to and approved in writing by the Local Planning Authority prior to first occupation:
  1. Provision of a verification report (appended with substantiating evidence demonstrating the approved construction details and specification have been implemented in accordance with the drainage scheme). The verification report shall include photographs of excavations and soil profiles/horizons, installation of any surface water structure (during construction and final make up) and the control mechanism.
  2. Provision of a complete set of as built drawings for site drainage.
  3. A final management and maintenance plan for the drainage network, including a drawing which identifies each feature to be made available to any parties responsible for maintenance.
  4. Arrangements for adoption and any other measurements to secure the operation of the scheme throughout its lifetime including name and contact details of any appointed management company and confirmation they have accepted the scheme.

Reason: To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site. In accordance with section 21 of the Flood and Water Management Act 2010 and Policy WAT5 Sustainable Drainage of the East Herts District Plan, 2018.

13. All waste materials and rubbish associated with demolition and / or construction shall be contained on site in appropriate containers which, when full, should be promptly removed to a licensed disposal site.

Reason: In order to ensure an adequate level of amenity for nearby residents in accordance with Policy EQ4 Air Quality of the adopted East Herts District Plan 2018

14. Prior to the commencement of the development hereby approved, a finalised Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority, and the plan shall include the following:
- a) The demolition and construction programme and phasing
  - b) Hours of operation, delivery and storage of materials
  - c) Details of any highway works necessary to enable construction to take place
  - d) Parking and loading arrangements
  - e) Details of site security, lighting and hoarding
  - f) Management of traffic to reduce congestion and protect pedestrians
  - g) Control of dust and dirt on the public highway
  - h) Details of consultation and complaint management with local businesses and neighbours
  - i) Waste management proposals
  - j) Mechanisms to deal with environmental impacts such as noise and vibration, air quality and dust, light and odour.
  - k) Details of any proposed piling operations, including justification for the proposed piling strategy, a vibration impact assessment and proposed control and mitigation measures.

All works shall be carried out in accordance with the approved

CEMP thereafter.

Reason: In the interests of avoiding potential detrimental impacts on the amenity of occupiers of neighbouring properties in accordance with Policy DES4 Design of Development, Policy EQ2 Noise Pollution and Policy EQ4 Air Quality of the adopted East Herts District Plan 2018.

15. Any external artificial lighting at the development hereby approved shall not exceed lux levels of vertical illumination at neighbouring premises that are recommended by the Institution of Lighting Professionals Guidance Note 9/19 'Domestic exterior lighting: getting it right!'. Lighting should be minimised and glare and sky glow should be prevented by correctly using, locating, aiming and shielding luminaires, in accordance with the Guidance Note.

Reason: In order to ensure an adequate level of amenity for the occupants of nearby properties in accordance with Policy EQ3 Light Pollution and DES4 Design of Development of the adopted East Herts District Plan 2018.

16. The ground floor area shown on the approved drawings as being for commercial use shall only be used within Use Class E(c) and Use Class E(g)(i).

Reason: In the interests of residential amenity and the vitality of the Town Centre.

17. Prior to the commencement of relevant works, the external materials of construction for the development hereby permitted shall submitted to and approved in writing by the Local Planning Authority, and thereafter the development should be implemented in accordance with the approved details.

Reason: In the interests of amenity and good design in accordance with Policy DES4 of the East Herts District Plan 2018.and good design in accordance with Policy DES4 of the East Herts District Plan 2018.



18. Prior to first occupation of the development hereby approved, details of landscaping shall be submitted and approved in writing and shall include full details of both hard and soft landscape proposals, finished levels or contours, hard surfacing materials, retained landscape features including trees, planting plans, schedules of plants including replacement trees, species, planting sizes, density of planting and implementation timetable and thereafter the development should be implemented in accordance with the approved details.

Reason: To ensure the provision of amenity afforded by appropriate landscape design in accordance with Policies DES3 and DES4 of the East Herts District Plan 2018.

19. Prior to the erection of any above ground superstructure, details of the 4 habitat boxes/structures to be installed shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be installed prior to the first occupation of the unit they are to be installed on (or the nearest proposed unit) and maintained throughout the lifetime of the development, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To improve the biodiversity value of the site and surrounding environment, in accordance with policy NE3 of the East Herts District Plan 2018.

20. Prior to the erection of any above ground superstructure a full metric to demonstrate Biodiversity Net Gain shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be maintained throughout the lifetime of the development, unless otherwise agreed in writing with the Local Planning Authority.

Reason: To improve the biodiversity value of the site and surrounding environment, in accordance with policy NE3 of the East Herts District Plan 2018.

## Plans

Plan Ref	Version	Received
PL017		8 <sup>th</sup> March 2023
PL013		8 <sup>th</sup> March 2023
PL012		8 <sup>th</sup> March 2023
PL006		8 <sup>th</sup> March 2023
PL005		8 <sup>th</sup> March 2023
PL004		8 <sup>th</sup> March 2023
PL003		8 <sup>th</sup> March 2023
PL001	Rev A	10 <sup>th</sup> August 2023
PL016		8 <sup>th</sup> March 2023
PL009	Rev A	27 <sup>th</sup> April 2023
PL010	Rev A	27 <sup>th</sup> April 2023
PL011	Rev B	10 <sup>th</sup> August 2023
PL014	Rev A	27 <sup>th</sup> April 2023
PL015	Rev A	27 <sup>th</sup> April 2023
PL007	Rev A	27 <sup>th</sup> April 2023
PL018	Rev A	27 <sup>th</sup> April 2023
PL020	Rev A	27 <sup>th</sup> April 2023
PL021	Rev A	27 <sup>th</sup> April 2023
PL022	Rev A	27 <sup>th</sup> April 2023

## Informatives

1. Other legislation (01OL1)
2. Construction Standards

The applicant is advised that in order to comply with this permission it will be necessary for the developer of the site to enter into an agreement with Hertfordshire County Council as Highway Authority under Section 278 of the Highways Act 1980 to ensure the satisfactory completion of all highway works. The construction of highway works must be undertaken to the satisfaction and specification of the Highway Authority, and by a contractor who is authorised to work in the public highway. Before works commence

the applicant will need to apply to the Highway Authority to obtain their permission and requirements

3. Obstruction of public highway land

It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence.

Further information is available via the website:

<http://www.hertfordshire.gov.uk/services/transtreets/highways/> or by telephoning 0300 1234047.

4. Parking and storage of materials

The applicant is advised that all areas for parking, storage, and delivery of materials associated with the construction of this development should be provided within the site and the use of such areas must not interfere with the use of public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence. Further

information is available via the

website: <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx> or by telephoning 0300 1234047

5. Road Deposits

It is an offence under section 148 of the Highways Act 1980 to deposit mud or other debris on the public highway, and section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure that all vehicles

leaving the site during construction of the development are in a condition such as not to emit dust or deposit mud, slurry or other debris on the highway. Further information is available via website: <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx> or by telephoning 0300 1234047.

## 6. Section 106 Planning Obligations

Planning permission to be granted subject to the applicant entering into a Section 106 agreement to secure monies to support/mitigate the impacts of the development proposed as shown and listed in Section 10 of this report.

## 7. Electric Vehicle Charging Points

Electric vehicle charging point specification for domestic installations cable and circuitry ratings should be of an adequate size to ensure a minimum continuous current demand for the vehicle of 16A and a maximum demand of 32A (which is recommended for Eco Developments).

- o A separate dedicated circuit protected by an RCBO should be provided from the main distribution board, to a suitably enclosed termination point within a garage, or an accessible enclosed termination point future connection to an external charging point.
- o The electrical circuit shall comply with the electrical requirements of BS7671:2008 as well as conform to the IET code of practise on Electric Vehicle Charging Equipment Installation 2012 ISBN 978-1-84919-515-7.

Additional guidance on charge point installation is available from the Office for Zero Emission Vehicles at <https://www.gov.uk/government/organisations/office-for-zero-emission-vehicles>.

8. Noise and Vibration Control

During any site preparation, demolition and construction phase the guidance in BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites' should be adhered to.

**Summary of Reasons for Decision**

East Herts Council has considered the applicant's proposal in a positive and proactive manner with regard to the policies of the Development Plan and any relevant material considerations. The balance of the considerations is that permission should be granted.

**KEY DATA****Residential Development**

<b>Residential density</b>	<b>92 habitable rooms/Ha (Low)</b>	
	Bedrooms	Number of units
Number of existing units	0	0
Number of new flat units	1	17
	2	2
Total		19

**Housing Tenures**

Private	Affordable Rent	Intermediate	Notes
19	0	0	N/A

**Background Papers**

The application submission and all relevant papers are published on the Council's website and can be made available by arrangement at the Council's offices in Hertford.