

PLANNING COMMITTEE - Thursday 22 October 2026

25/0563/RSP - Part Retrospective: Creation of vehicle parking areas for company vehicles including alterations to land levels and associated boundary treatment hard and soft landscaping, attenuation basin, lighting; the use of the existing bungalow as offices including loft conversion with dormers and rooflights; and demolition of stables and construction of two-storey building for office / training / vehicle maintenance premises (Use Class Sui Generis) at THE PADDOCK, LITTLE OXHEY LANE, CARPENDERS PARK, WATFORD, WD19 5BA.

Parish: Watford Rural Parish Council
Expiry of Statutory Period: 15.07.2025

Ward: Carpenders Park
Case Officer: Lauren Edwards

Recommendation: That part retrospective planning permission be **granted**, subject to conditions.

Reason for consideration by the Committee: Application called in by three members of the planning committee to consider the impact of the development on the Green Belt.

Development type: Small scale major (commercial)

To view all documents forming part of this application please go to the following website:

[25/0563/RSP - Part Retrospective: Creation of vehicle parking areas for company vehicles including alterations to land levels and associated boundary treatment hard and soft landscaping, attenuation basin, lighting; the use of the existing bungalow as offices including loft conversion with dormers and rooflights; and demolition of stables and construction of two-storey building for office / training / vehicle maintenance premises \(Use Class Sui Generis\).](#)

Relevant Planning History

- 1.1 08/1694/FUL - Single storey rear extension - Refused, for the following reason:

R1: The proposed development by reason of its overall design, width, bulk and massing would result in an overly prominent development disproportionate in size to the main dwelling which would not constitute 'limited extension'. The proposed development would be to the detriment of the openness of the Green Belt. No special circumstances have been demonstrated by the applicant. As such the proposed development would be contrary to Policies GB1 and GB6 of the Three Rivers Local Plan 1996-2011.

- 1.2 13/1810/FUL - Demolition of existing stable blocks and temporary buildings and erection of vehicle service building (Use Class B1). Stopping up of one existing access and alterations to second existing access. Ancillary works including planting and fencing to boundaries. Permitted and implemented.
- 1.3 14/1885/RSP - Part Retrospective: Landscape works to re-grade and re-level sections of the green field area of the site - Permitted and implemented.
- 1.4 17/0397/RSP - Part Retrospective: Erection of additional parking area and part change of use of existing dwelling to include office and training room – Permitted (subject to a personal and temporary 5 years use of “additional parking area”).

- 1.5 19/2049/FUL - Retention of existing parking and creation of additional parking area for company vehicles including alterations to land levels and associated hard and soft landscaping and loft conversion of existing bungalow for office use including dormers. Refused for the following reason:

R1: The proposed development (excluding the proposed works to the building) constitutes inappropriate development in the Metropolitan Green Belt as it fails to preserve openness as required by paragraph 146 of the NPPF (2019). By virtue of the scale, siting, additional activity and associated ancillary works the parking areas would have a significant impact on the openness of the Green Belt and would also have an adverse impact on the visual amenity of the locality. Whilst material considerations exist which weigh in favour of the development they do not individually or cumulatively outweigh the inappropriateness of the development, harm to openness and other harm identified. The development therefore fails to comply with Policies CP1, CP11 and CP12 of the Core Strategy (adopted October 2011), Policy DM2 of the Development Management Policies LDD (adopted July 2013) and the NPPF (2019).

- 1.6 20/0748/FUL – Retention of existing parking area and creation of additional parking area for company vehicles including alterations to land levels and associated hard and soft landscaping and loft conversion of existing bungalow for office use including dormers – Permitted.
- 1.7 22/0116/COMP – Enforcement enquiry: Works not in accordance with planning permission 19/2049/FUL – pending consideration, subject to the outcome of this application.

2 Description of Application Site

- 2.1 The application site is located on the corner between Oxhey Lane and Little Oxhey Lane, on the outskirts of Carpenders Park. The application site includes an area of 2.3Ha which currently comprises of two main parts. To the northern portion there is an existing large area of hardsurfacing with land levels rising from west to east. The hardstanding serves as coach and minibus parking for vehicles associated with the fleet used by the current business which operates out of the site 'Lucketts'. To the east is a detached building (formerly a dwellinghouse) which operates as an office and training rooms. To the south of this is a detached structure where servicing and repairs are undertaken.
- 2.2 To the southern portion of the site there are vehicles stored in this area and a detached building which was formerly used as a stables, this area currently operates in conjunction with the existing business but less intensely than the northern portion. This area prior to its current use was used as an open field.
- 2.3 The primary access to the site is from Little Oxhey Lane to the north. However, there is an emergency access from Oxhey Lane, albeit this is currently blocked off. There is also a historic access to the southern part of the site however this is also blocked off.
- 2.4 The site is located opposite Carpenders Park nursery which sits to the north. To the east are residential properties along Oxhey Lane together with Grims Dyke Golf Course. To the south and west is open field land.
- 2.5 The application site is located within the Metropolitan Green Belt.
- 2.6 There are also protected trees on the site boundaries (TPO.291 & TPO.0533).

3 Description of Proposed Development

- 3.1 This application seeks part retrospective planning permission for the creation of vehicle parking areas for company vehicles including alterations to land levels and associated boundary treatment hard and soft landscaping, attenuation basin, lighting; the use of the existing bungalow as offices including loft conversion with dormers and rooflights; and the

demolition of stables and construction of a two-storey building for office, training and vehicle maintenance purpose falling within a Sui Generis Use Class.

- 3.2 Section 7.1 provides a more detailed overview of the context of the site history. This planning submission forms two main parts.
- 3.3 The first relates to planning permission 20/0748/FUL and on-going enforcement case 22/0116/COMP, and the second comprises 'new development' that has not previously been considered. Together, the two elements comprise the re-development and expansion of the current transport business 'Lucketts'.
- 3.4 Planning permission was initially granted via 20/0748/FUL for additional hardstanding/parking within the northern section of the site and commenced. However, the additional parking area within the northern portion of the site (adjacent to the junction with Little Oxhey Lane and Oxhey Lane) was consented to be at a lower land level and not as close to the boundary with Oxhey Lane. This application seeks to regularise the approved land level heights and seeks to introduce additional landscaping to the boundaries and a revised layout to move some of the larger coaches more centrally in the site.
- 3.5 The other element of the proposal is the provision of additional hardstanding/parking to the southern part of the site (currently an open field) and the erection of a detached two storey building. The proposed building would operate as offices, a training facility and enable vehicle maintenance. The proposed building would have a maximum width of 57m and a depth of 32m however would be stepped such that it would reduce in depth toward the south. The building would have a flat roof with a height of 7m. It would also have a roof lantern projecting 1.7m above the flat roof above the central section of the building. The building would be finished in facing brickwork with a metal wall system.
- 3.6 The existing servicing building would be retained and the existing 'bungalow' would also be retained for use as offices. This includes the removal of the remaining portion of C3 floorspace in the bungalow. Additionally, the loft conversion in situ does not accord with the approved plans (20/0748/FUL) and thus this application also seeks retrospective permission for these elements. The dormer windows in situ each have a width of 6m in comparison to 3.5m as previously consented. There have also been alterations to the number and positioning of rooflights (now 3 to the rear and 1 to the front).
- 3.7 An attenuation basin would be provided within the south western corner of the site.
- 3.8 Amended plans have been received during the course of the application and are summarised below:
- Relocation of a section of coach parking spaces into the centre of the site from a location adjacent to Little Oxhey Lane, and locating minibus spaces adjacent to Little Oxhey Lane. Introduction of additional planting to the southern boundary of the site.
 - Replaced closed boarded fencing along Oxhey Lane with metal mesh fencing which would be sited 'site side' of additional planting.
 - Clarification of the proposed lighting and a reduction in the scale/number of lighting columns in the 'new' portion parking.

4 Consultation

4.1 Statutory Consultation

4.1.1 Watford Rural Parish Council: No response received.

4.1.2 Hertfordshire County Council – Highway Authority: [No objection subject to conditions]

Notice is given under article 22 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that Hertfordshire County Council as Highway Authority does not wish to restrict the grant of permission subject to the following conditions:

1. A: Highway Improvements – Offsite (Design Approval)

Notwithstanding the details indicated on the submitted drawings no on-site works above slab level shall commence until a detailed scheme for the necessary offsite highway improvement works have been submitted to and approved in writing by the Local Planning Authority. These works shall include:

- The new 2m wide stretch of highway footway fronting the site;*
- Pedestrian crossing point made up of pedestrian dropped kerbs and tactile paving on either side of Little Oxhey Lane.*

B: Highway Improvements – Offsite (Implementation / Construction)

Prior to the first use of the development hereby permitted the offsite highway improvement works referred to in Part A of this condition shall be completed in accordance with the approved details.

Reason: To ensure construction of a satisfactory development and that the highway improvement works are designed to an appropriate standard in the interest of highway safety and amenity and in accordance with Policy 5, 13 and 21 of Hertfordshire's Local Transport Plan (adopted 2018)

2. Provision of Access and Parking

Prior to the first use of the development hereby permitted, the on-site hardstanding and turning and parking areas shall be laid out, demarcated, levelled, surfaced and drained in accordance with the approved plans and retained thereafter available for that specific use.

Reason: To ensure construction of a satisfactory development and in the interests of highway safety in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

3. Construction Management Plan

No development shall commence until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority.

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. Construction vehicle numbers, type, routing;*
- b. Access arrangements to the site;*
- c. Traffic management requirements*
- d. Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas);*
- e. Siting and details of wheel washing facilities;*
- f. Cleaning of site entrances, site tracks and the adjacent public highway;*
- g. Timing of construction activities (including delivery times and removal of waste) and to avoid school pick up/drop off times;*

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).

Highway Informatives HCC as Highway Authority recommends inclusion of the following Advisory Note (AN) to ensure that any works within the highway are carried out in accordance with the provisions of the Highway Act 1980:

AN) Agreement with Highway Authority: 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 the access and associated road improvements. The construction of such 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. 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>

AN) 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.

AN) Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the 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/business-licences/business-licences.aspx>

Comments / Analysis

The proposal comprises of an extension to the existing site for use for commercial vehicle parking and associated works at The Paddock, Little Oxhey Lane, Carpenders Park. Little Oxhey Lane is designated as a classified 'B' secondary distributor road, subject to a speed limit of subject 40mph and is highway maintainable at public expense. The site is located approximately 100m west of the junction with the A4008 Oxhey Lane.

Little Oxhey Lane is classed as P2/M2 on HCC's Place & Movement Network.

A Transport Statement (TS) has been submitted as part of the application.

Access

There is an existing vehicle access into the site from Little Oxhey Lane, in the form of a simple priority junction / bellmouth access. The vehicular access is not proposed to be changed. Following consideration of the design of the existing access and nature of the proposals linked to the existing use of the site, the vehicle access from the highway is considered to be acceptable.

A swept path analysis / tracking plans has been included in Appendix F of the TS to illustrate that a two minibuses would be able to pass one another in addition to a minibus and coach

passing another. The details are considered to be acceptable in this respect particularly as these movements would already be happening as part of the approved and current use of the site.

The level of vehicle to vehicle visibility as shown in Appendix G of the TS is considered to be acceptable and sufficient.

The current application includes the provision of a new footway and footpath link into the site, including an unsignalized pedestrian crossing point on Little Oxhey Lane to enable pedestrian access from within the site and to the existing highway footway on the north-west side of Little Oxhey Lane. The details of this are shown on submitted drawing number SK11 and the principle of this would be supported at this planning application stage to maximise pedestrian accessibility to and from the site.

Following the granting of any planning permission, the applicant would need to enter into a Section 278 Agreement with the Highway Authority in relation to the works that would be needed on highway land including:

- The new 2m wide stretch of highway footway fronting the site;
- Pedestrian crossing point made up of pedestrian dropped kerbs and tactile paving on either side of Little Oxhey Lane. An extent of highway plan to clarify the works which would be within the existing highway in addition to the submission of a Stage One Road Safety Audit and Designers Response for any of the proposed highway works would be required to be submitted as part of the 278 application.

Internal Site Layout and Parking

The proposals linked to the application increases the number of mini bus spaces from the current 54 to 202 and the number of car parking spaces from 24 to 31. The number of coach parking spaces is remaining the same at 27.

Service and emergency access will remain as for existing including for a fire tender and other service vehicles. There would not be any particular concerns in this respect when taking into account that the site is designed to provide access for coaches.

The extended site layout is shown on submitted drawing number 201304/PL/801. The dimensions and layout of the parking and manoeuvring areas are considered to be acceptable by HCC as Highway Authority.

A number of electric vehicle charging spaces has been accommodated for, which would be supported by HCC as Highway Authority. The TS states that "full cycle parking will be provided on site in line with local policy. It would be recommended that the level of cycle parking is increased as and if demand arises for it, acknowledging the nature of the use of the site. Three Rivers District Council (TRDC) as the parking and planning authority for the district would ultimately need to be satisfied with the overall level and type of parking

Trip Generation, Distribution and Traffic Impact Assessments

A trip generation assessment for the proposed use has been included in section 6 of the TS. The existing vehicle trip generation has been assessed using existing turning counts associated with the site, which has resulted in 21 two-way vehicle movements in the AM peak (8:00 to 9:00) and 18 two-way vehicle movements in the PM peak (17:00 to 18:00). The proposed trip generation has been based on the increase in number of minibuses spaces although the points made that in respect to providing a worst-case prediction is acknowledged (the ability to store more vehicles in site and therefore less moving around off-site of such vehicles). The worst-case scenario assessment results in 62 number two-

way vehicle movements in the AM peak and 38 two-way vehicle movements in the PM peak.

A Junctions 9 PICADY assessment has also been conducted, based on the above worst-case scenario trip generation and included in the TS to assess the operation of the site at a base year of 2024 and a future assessment year of 2029 plus development. The results of the modelling show that the maximum Ratio of Flow to Capacity (RFC) are well within the generally agreed practical capacity of 0.85 on all scenarios and therefore considered acceptable.

Following assessment of these details, the impact on the operation of the surrounding highway network from a trip generation perspective and capacity perspective would not be a reason to recommend refusal from a highways perspective.

Conclusion

HCC as Highway Authority has considered that the proposal would not have a safety impact or severe impact on the operation of the surrounding highway. The applicant would need to enter into a Section 278 Agreement with HCC to cover the technical approval of the design, construction and implementation of the highway works at the access to the site. Therefore HCC has no objections on highway grounds to the proposals, subject to the reference to, and inclusion of, the above planning conditions and informatives.

4.1.3 Herts Ecology: [No objection subject to conditions/informatives].

Overall Recommendation

- Application can be determined with no ecological objections (with any Informatives/Conditions listed below).

Summary of Advice

- No major ecological constraints to development.
- Loss of rough grassland of some site value and low population of slow worms.
- Some onsite enhancements for species and BNG.
- Offsite BU required to achieve BNG.
- Biodiversity Gain condition required.
- CEMP and Species Enhancement Plan required

Comments

1. The northern half of the site is already developed for car parking – for which retrospective permission is sought – whilst the southern area is currently grassland into which it is proposed to extend similar development of parking and new premises.

2. An Ecological Impact Assessment (EclA) has been submitted for the southern section of the Site, based on Preliminary Ecological Appraisal (PEA), a Preliminary Roost Assessment (PRA) and Reptile Surveys in August and September 2024.

3. The desk survey found no existing ecological interest on record for the site. The bulk of the site was largely ruderal and coarse grassland vegetation of poor quality although it did support black knapweed and bord's-foot trefoil. There was a patch of species-poor neutral grassland which is now classified as modified grassland. The boundary was a mixture of other tall forbs and native hedgerow with trees. Although of some ecological value at the

site level by virtue of supporting relatively undisturbed habitat, the mowing regime limited any structural diversity within the grassland although this is purely a function of management and could change. However, none of the habitats affected are a constraint on development.

4. No buildings were considered to be suitable for bats, whilst the site boundary and other vegetation had moderate suitability for commuting and foraging.

5. Great crested newts were not considered to be present or likely to use the site given a lack of ponds on site and adjacent sub-optimal habitats.

6. A low population of slow worm is known to be present, one juvenile having been caught. It does not meet the threshold for a key reptile site and appropriate habitat modification prior to any works will help to mitigate impacts. Retention of boundary hedgerows would be beneficial, although there will obviously be a loss of suitable rank grassland habitat within the site.

7. No other evidence of protected species was found or considered likely. No further surveys were advised and I have no reason to disagree with this.

8. A small number of ecological enhancements are proposed – including provision for new nesting and roosting, trees, scrub, hedgerow extension, buffer strip with wildflower grassland. Whilst these will provide local enhancements to the remaining habitats, the loss of grassland will not be compensated within the site, although it is only of low distinctiveness. The development will not impact on other sites or habitats of principal importance.

9. The most ecologically valuable boundary habitats will be retained and buffered. However, it is incorrect to consider that short-term detrimental impacts can be managed and that with appropriate design and mitigation, the ecological function of the site for wildlife can be restored and enhanced if the majority of the open grassland area is to be lost. It is, nevertheless, important to ensure the following:

- Precautionary working methods.
- Exclusion of reptiles through habitat modification before work commences.
- Lighting mitigation.
- New and enhanced habitats provided.

10.1 The biodiversity metric lists the habitats recorded onsite, which generates a total habitat unit score of 3.95. The Condition Assessments appear accurate. On this basis, I consider the baseline is acceptable and that the application can be determined.

10.2 Calculations for achieving BNG have also been presented although they are not a requirement for determination. A total of 2.81 area Biodiversity Units (BU) are proposed to be provided onsite, most of which (1.94 BU) is made up of wildflower meadow which is a significant habitat even though these 'meadows' will be relatively thin strips of grassland. 4.78 Hedgerow BU are proposed onsite.

10.3 This equates to a net loss of 7.13% Habitat BU, and a net gain of 11.60% Hedgerow BU. Currently BNG has not been achieved and will therefore require 0.68 habitat BU to be delivered offsite. This is outlined within the BNG report.

11. The lighting assessment demonstrates that the hedgerow boundaries will be subject to light levels of between 0.4 and 0.2 lux. The angles of tilt for both luminaire designs to be used will be 5 degrees, which is near horizontal and acceptable. This will also considerably reduce any impacts from glare.

12. On the basis of the above, I consider there are no ecological constraints for development on this site and that it may be determined accordingly.

Conditions and informatives

The following conditions are considered necessary to ensure the works may proceed having taken full account of the current and future biodiversity of the site and BNG:

1. Biodiversity condition. This should be informed by a fully completed metric, Biodiversity Gain Plan (Gov template advised) and HMMP (Gov template advised). The significant BNG onsite should also be secured by an appropriate legal agreement for 30 years and subject to monitoring.

2. Condition for a CEMP to provide guidance of working methods. This should be based on 7.2 and 7.3 of the EcIA.

3. Condition for Species Enhancement Plan to include features outlined in EcIA 7.5.

4.1.4 Lead Local Flood Authority: [No objection subject to conditions]

Thank you for your reconsultation on the above site. We have reviewed the application as submitted and wish to make the following comments.

It is understood that retrospective permission is sought for development which has already been undertaken in the northern part of the site, which did not comply in entirety with the provisions set out in planning application reference 20/0748/FUL. These are to include:

- the continued use of 'The Bungalow' premises as ancillary offices for Lucketts of Watford and the retention of the loft conversion (including dormers)
- the retention of the as built, constructed vehicular parking area located in the east of the northern part of the site

It is also understood that this application seeks planning permission for the proposed extension of the development into the southern part of the site, which will include the construction of a two-storey office building (to be used for training and vehicle maintenance), a new parking area and associated hard and soft landscaping.

Since our previous response, the application has provided updated information that addresses our previous concerns. Therefore, we have **no objection subject to conditions being attached to any consent** if this application is approved. We suggest the following wording.

Condition 1

Prior to the commencement of development, construction drawings of the surface water drainage network, associated sustainable drainage components and flow control mechanisms and a construction method statement shall be submitted and agreed in writing by the local planning authority. The scheme shall then be constructed as per the agreed drawings, method statement and FRA & Drainage Strategy and remaining in perpetuity for the lifetime of the development unless agreed in writing by the Local Planning Authority. No alteration to the agreed drainage scheme shall occur without prior written approval from the Local Authority.

Reason: To ensure that the development achieves a high standard of sustainability and to comply with NPPF and Policies of Three Rivers District Council.

Condition 2

The development hereby approved shall not be occupied until details of the maintenance and management of the Sustainable Drainage Scheme (SuDS) in accordance with National SuDS Standard 7 have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the network in addition to those listed in SuDS Standard 7 to be submitted for approval shall include:

- 1. A timetable for its implementation.*
- 2. Details of SuDS feature and connecting drainage structures and maintenance requirement for each aspect including a non-technical labelled drawing showing where they are located and how to access them.*
- 3. A management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. This will include the name and contact details of any appointed management company.*

Reason: *To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Local Plan Policies of Three Rivers District Council.*

Condition 3

Upon completion of the surface water drainage scheme and prior to the first occupation of the development, a detailed verification report, (appended with substantiating evidence demonstrating the approved construction details and specifications have been implemented in accordance with the surface water drainage scheme), has been submitted to and approved (in writing) by the Local Planning Authority. The survey and report shall demonstrate that the surface water drainage system has been constructed in accordance with the details approved and shall include as a minimum.

- 1. CCTV survey of underground structures,*
- 2. A full set of “as built” drawings highlighting any minor changes to the approved drawings.*
- 3. Photographs of excavations (including soil profiles/horizons) and any installation of any surface water drainage structures and control mechanisms.*
- 4. Where necessary, details of corrective works to be carried out along with a timetable for their completion, shall be included for approval in writing by the Local Planning Authority. Any corrective works required shall be carried out in accordance with the approved timetable and subsequently re-surveyed with the findings submitted to and approved in writing by the Local Planning Authority.*

Reason: *To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Local Plan Policies of Three Rivers District Council.*

Informative

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the appropriate authority. It is advised to discuss proposals for any works at an early stage of proposals.

Both FEH13 and FEH22 are currently accepted to support drainage modelling calculations. For the avoidance of doubt the use of FSR and FEH1999 data has been superseded and therefore, use in rainfall simulations are not accepted.

4.1.5 National Grid: No response received

4.1.6 TRDC Landscape Officer: No response received

4.1.7 London Borough of Harrow: No response received.

4.2 Public/Neighbour Consultation

4.2.1 Number consulted: 3

4.2.2 No of responses received: 16 letters of support (0 objections)

4.2.3 Site Notice: Expired 20.05.2025 Press notice: Expired 27.06.2025

4.2.4 Summary of Responses:

- Employment opportunities
- Intent clear to operate responsibly
- Positive impact on economy
- Service contribute to a challenging specialist transport sector
- Development will help them maintain business
- Many families rely on their services
- Provide vital support for families and children with additional needs
- Relocation would have negative impacts

5 Reason for Delay

5.1 Further information sought.

6 Relevant Planning Policy, Guidance and Legislation

6.1 Planning applications are required to be determined in accordance with the statutory development plan unless material considerations indicate otherwise as set out within S38 (6) Planning and Compulsory Purchase Act 2004 and S70 of Town and Country Planning Act 1990).

The Localism Act received Royal Assent on 15 November 2011. The growth and Infrastructure Act achieved Royal Assent on 25 April 2013.

The Wildlife and Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2010, the Natural Environment and Rural Communities Act 2006 and the Habitat Regulations 1994 may also be relevant.

The Environment Act 2021.

6.2 The Three Rivers Local Development Plan

The application has been considered against the policies of the Local Plan, including the Core Strategy (adopted October 2011), the Development Management Policies Local Development Document (adopted July 2013) and the Site Allocations Local Development Document (adopted November 2014) as well as government guidance.

The Core Strategy was adopted on 17 October 2011 having been through a full public participation process and Examination in Public. Relevant policies include Policies CP1, CP6, CP9, CP10, CP11 and CP12.

The Development Management Policies Local Development Document (DMLDD) was adopted on 26 July 2013 after the Inspector concluded that it was sound following Examination in Public which took place in March 2013. Relevant policies include DM2, DM3, DM4, DM6, DM7, DM8, DM9, DM13 and Appendices 2 and 5.

6.3 Other Material Considerations

In August 2026 the NPPF was updated. Relevant policies include: S3, S5, GB2, GB6, GB7, DP3 and HE6.

The Community Infrastructure Levy (CIL) Charging Schedule (adopted February 2015).

On 31 July 2026 the Regulation 19 Consultation opened on the Three Rivers District Council Local Plan 2026-2042 (Parts I and II). As such, weight can now be given to policies and sites contained within that Plan.

7 Planning Analysis

7.1 Overview

- 7.1.1 In 2013 planning permission was granted within the northern parcel of the application site under reference 13/1810/FUL for the demolition of the former stable block and temporary buildings and the erection of a vehicle service building (Use Class B1) along with ancillary works including planting and fencing to boundaries. This permission was granted by the Local Planning Authority in December 2013 and was subject to a number of planning conditions.
- 7.1.2 Following the implementation of this permission and subsequent engineering operations to the field, the northern parcel of the application site significantly increased on-site parking after failing to implement a number of soft landscaping areas as required by Condition 8 of 13/1810/FUL. By virtue of the above changes the applicant was also in breach of Condition 9 of 13/1810/FUL which restricted and confined parking levels to no more than 12 company vehicles towards the west.
- 7.1.3 After the applicant was made aware of the breach, a part retrospective planning application was submitted under reference 17/0397/RSP and included the creation of an additional parking area and part change of use of the existing dwelling to include an office and training room. The permission was granted subject to a number of restrictive conditions including the temporary use of the 'additional parking area'.
- 7.1.4 In 2020 a further application was submitted at the site via 20/0748/FUL which sought to create a more formalised parking area which included significant land level alterations. This permission was allowed at the Planning Committee, overturning the recommendation by officers, by concluding that very special circumstances existed to enable the expansion of the business. However, following the commencement of this permission) it was ascertained that works had not been carried out in accordance with the approved plans (22/0116/COMP).

7.1.5 This application seeks planning permission for the aspects of the development which do not accord with the approved plans as well as to the new elements (as have been set out on section 3 above).

7.2 Impact on Green Belt

7.2.1 Policy CP11 of the Core Strategy sets out that there is a general presumption against inappropriate development that would not preserve the openness of the Green Belt or which would conflict with the purposes of including land within it. Policy CP11 is supported by Policy DM2 of the Development Management Policies LDD and relates to the construction of new buildings.

7.2.2 The NPPF (August 2026) sets out that the objective of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The government attaches great importance to Green Belts, the essential features of which are their openness and permanence.

7.2.3 Policy GB2 of the NPPF states that Green Belt serves five purposes:

- a) To check the unrestricted sprawl of large built-up areas;
- b) To prevent neighbouring towns merging into one another;
- c) To assist in safeguarding the countryside from encroachment;
- d) To preserve the setting and special character of historic towns; and
- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

7.2.4 Policy GB6 (2) states that inappropriate development, is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Such circumstances will not exist unless the potential harm to the Green Belt by reasons of its inappropriateness and any other harm resulting from the proposed development is clearly outweighed by other considerations. In making this assessment, substantial weight should be given to the harm to the Green Belt which would be caused, including harm to its openness.

7.2.5 Policy GB6 (1) states that development in the Green Belt is inappropriate unless it falls within one of the categories in policy GB7. Policy GB7 sets out that a number of categories of development that are not inappropriate in the Green Belt, and which therefore should not be regarded as harmful to the Green Belt or be required to demonstrate very special circumstances. The relevant exception is set out below. Whilst it is noted that other exceptions may apply to some elements of the scheme, given the comprehensive redevelopment of the site that is proposed Officers are of the view that all elements can be considered under the exception set out below.

g) Development where all of the following apply:

- i. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- ii. There is an evidenced unmet need for the type of development proposed;
- iii. The development would be in a sustainable location, with particular reference to policy TR3 of this Framework; and
- iv. In the case of major development involving the provision of housing, the development proposed complies with policy GB8.

7.2.6 For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in policy GB2.

A) To check the unrestricted sprawl of large built - up areas.

- 7.2.7 For the purposes of this test the nearby settlement of Carpenders Park and the adjoining settlement of South Oxhey are considered to be a large built up area. However, the application site is somewhat detached from Carpenders Park, separated by open space, a cemetery and woodland. It therefore sits on a more isolated pockets of development on the junction of Little Oxhey Lane and Oxhey Lane, including the Carpenders Park Garden Centre and residential properties. Therefore, based on the above, it is not considered that the application site falls within a large built up area, namely Carpenders Park.
- 7.2.8 Nevertheless, Oxhey Lane to the east and Little Oxhey Lane to the north both form physical features that contain the site and prevent sprawl in these directions. To the west is a mature band of vegetation including trees. Whilst the vegetation to the south is slightly less dense than to the west the development includes significant amounts of planting to this edge of the site which would further contain unrestricted sprawl to the south. Notwithstanding the above view, if it were considered to form part of a large built up area, it is not considered to contribute strongly and would best fall within the moderate contribution.

B) To prevent neighbouring towns merging into one another.

- 7.2.9 Watford, Northwood and Harrow/Hatch End would be the nearest towns to the application site. Carpenders Park is physically separated from other settlements and thus is not considered to form part of a town. Hatch End and Harrow to the south are sited 0.5 miles to the south and separated by open field land. Given the proposed development would be spreading south toward Hatch End it moderately contributes given the size of the site. However for the reasons outlined above the site is also contained on all 4 sides. Thus, would not result in the merging of neighbouring towns. (In this case Watford and Harrow).

D) To preserve the setting and special character of historic towns.

- 7.2.10 The PPG sets out that areas that make no or only a weak contribution are likely to include those that 'have no visual, physical or experiential connection to the historical aspects of the town'. The site is located some distance from any historic towns. As such the proposal would preserve the setting of historic towns as it would have no visual, physical or experiential connection to any aspect of a historic town. The development site would therefore have a weak contribution to this purpose.

Summary of g (i)

- 7.2.11 For the reasons outlined above it is considered that the site does not strongly contribute to the above purposes. Whilst there would be conflict with encroaching into the countryside this would not undermine the remaining Green Belt across the plan area. In turn it is considered that the site comprises Grey Belt land in the context of g (i) of the NPPF.

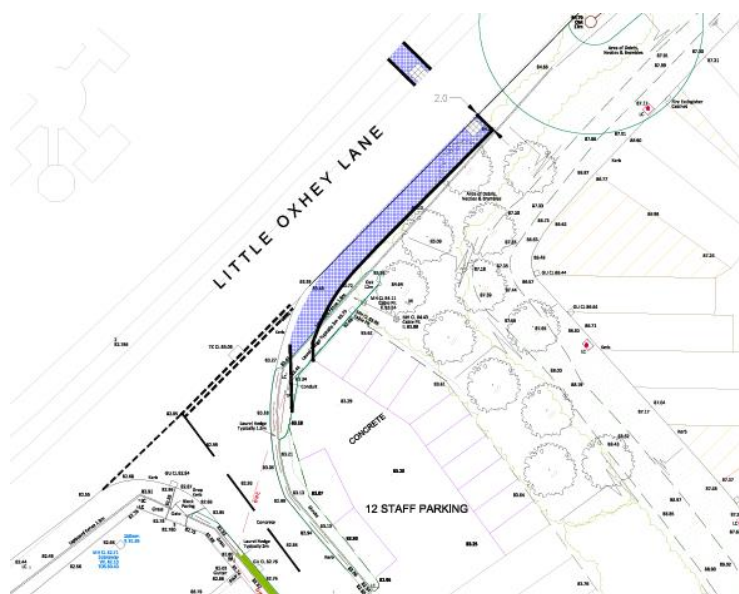
There is an evidenced unmet need for the type of development proposed

- 7.2.12 As part of their submissions the applicant has provided detailed justification in relation to the nature of the business operating from the site.
- 7.2.13 The proposed development would support the sustainability of the existing business which provides transport across Hertfordshire. The statement sets out that councils are obligated by law to provide free transport for pupils for have special education needs and disabilities (SEND). The business provides specialist school transport for special needs and mainstream school children. Lucketts provides 390 contracts for the transportation of SEND pupils and vulnerable adults. Additionally providing 36 transport contracts for mainstream schools. 73% of which are with HCC. 2984 children across the county are in need of specialist daily transport across Hertfordshire (published by HCC in 2023) to which Lucketts contributes towards. This has increased in recent years (from 2400 in 2014). Overall, it is considered that there is an evidenced demonstrable unmet need across the district and

country wide for the provision of specialist transport services to which the proposed development would support. Therefore, the proposal would comply with (g)(ii).

The development would be in a sustainable location, with particular reference to policy TR3 of this Framework;

- 7.2.14 Policy TR3 (1) sets out “development is located where it can support sustainable patterns of movement, enable good accessibility for different users and make the most of existing and proposed transport infrastructure, development proposals should reflect the following principles, taking into account the vision for the site, the type of development and its location”. Policy TR3 further sets out that proposals which could generate significant amounts of movement, in the context of the area they are within, should be in locations that are sustainable or can be made sustainable. This means the location should limit the need to travel by private car and offer a genuine choice of transport modes, unless the nature of the development makes this impractical.
- 7.2.15 The NPPF sets out that:
- Reasonable walking distance: For the purpose of policies S5, L3, GB7 (relating to land around well-connected stations), this should be considered to be around 800 metres, or around 10 minutes’ walk time if topography, route availability and quality or physical barriers would prevent or discourage walking from up to 800 metres away.*
- 7.2.16 This type of development proposal is distinct from residential development or some forms of commercial development owing to the transportation nature of the business. In turn the development should not be expected to fall within a settlement with good connections and has a well established business currently operating from the site. However, the business still has employees that would travel to the site to collect the coach/mini bus. It is not considered that the development makes it ‘impractical’ to offer a choice of transport modes in the context of policy TR3 however the movements are different to residential development.
- 7.2.17 The development remains closely related to Carpenders Park and is well connected. The application site is located approx. 1100m from Carpenders Park station and 1200m from Hatch End. However is located 400m from bus stops in Harrow Way which provide services to Bushey, Watford and North Watford.
- 7.2.18 As set out above the aim of policy TR3 is to ensure that development is focused towards sustainable locations and encourages a choice of transport modes. The site would allow for a choice for employees to access public transport services from Harrow Way or to cycle to a station. Secure cycle parking would be provided to encourage this. Furthermore the proposal also includes off site improvements (which would be secure by a S278 agreement with HCC) in order to encourage walking connectivity. This includes a 2m footway fronting the site and a pedestrian crossing point made of dropped kerb and tactile paving on either side of Little Oxhey Lane. There is currently no formal safe crossing point or footway to and from the site and as such this alteration would significantly improve pedestrian access.



- 7.2.19 When considering the proximity to bus services, cycle storage facilities and improvements to pedestrian access. Overall, the proposal would (as a result of the off site improvements via S278 agreement) make the site sustainable proportionately to the nature of the development. Overall, there is an existing established business operating from the site and the proposed development is offering enhanced connectivity. In the context of TR3 and the type of development the proposal is considered to be compliant with g(iii).

In the case of major development involving the provision of housing, the development proposed complies with policy GB8

- 7.2.20 The proposal does not include the provision of housing and thus GB8 does not apply.
- 7.2.21 In concluding, Officers consider that the application site comprises Grey Belt land and complies with the provisions afforded by GB7 (g) in its totality. Thus, the proposal comprises appropriate development in the Green Belt.
- 7.2.22 Should members reach an alternative view on any of the factors set out in GB7 (g) (i-iii) and also consider the development does not meet any other exception set out within the NPPF the proposal would then comprise inappropriate development and would also result in harmful impacts to the openness of the Green Belt and conflict with one of the purposes of the Green Belt. These would need to be advanced further. The NPPF sets out that unacceptable harm to the Green Belt and any other harm can only be outweighed in Very Special Circumstances. These are considered at the end of the report.
- 7.2.23 However as set out above, Officers conclude that the development would not be inappropriate in the Green Belt thus does not result in harm in this respect.

7.3 Impact on local landscape, character, street scene and nearby heritage assets

- 7.3.1 Policy CP12 of the Core Strategy (adopted October 2011) states that the Council will expect all development proposals to have regard to the local context and conserve the character, amenities and quality of an area. Policy DM7 of the Development Management Policies LDD (adopted July 2013) also states that the Council will require proposals to make a positive contribution to the surrounding landscape.
- 7.3.2 Firstly, taking the proposed element of the development which includes the extension of a significant amount of hardsurfacing into the undeveloped field to the south of the more established compound as well as a substantial two storey building constructed to the western part of the southern portion of the site. It is acknowledged that both elements would

alter the context of the southern part of the site. However this does not, in itself, automate harm.

- 7.3.3 The application has been accompanied by a Landscape Visual Impact Assessment (LIVA) and during the course of the application clarification was sought by officers in relation to some of the viewpoints taken. The topography of the site is such that land levels rise from west to east towards Oxhey Lane. The proposed building would be sited at the lowest part of the site which would assist in mitigating its visual impact as experienced from Oxhey Lane and Little Oxhey Lane. Initial concerns were had regarding longer range views from the west where the land rises up again toward the railway line and Pinner Wood. However, there are no direct views of the site owing to the railway embankment and vegetation belts. Some localised views would be likely of the building from Little Oxhey Lane however the visual impact and prominence of the building would, in part, be obscured by the existing building and mitigated by the change in topography with enhanced planting. There is the potential for some views further south however the road boundaries a relatively strong in this direction. There would be very limited longer range views from the east owing to the change in land levels and any shorter range views from Oxhey Lane would be screened by the highways vegetation and increased planting along the eastern boundary.
- 7.3.4 The proposal also includes the installation of lighting within the new portion of parking. Amendments have been received during the course of the proposal to reduce the number and provide further detail of the height of lights. The columns would reduce in height as the land levels rise towards Oxhey Lane. It is acknowledged that the principle of the introduction of lighting into the undeveloped part of the site would have an urbanising impact compared with the existing site. However this would be mitigated by the relatively low number of columns and reduced further by controlling that they are only turned on in line with the operating times of the parking area. Details of external lighting on the building would be reserved by condition.
- 7.3.5 Overall, there would be some localised harm through the size of the building, use of land for parking and associated infrastructure including lighting which would not be in keeping with the rural appearance of the site. However, this is tempered by the location of the site falling within an area which is somewhat varied in terms of character and would be adjacent to the established part of the site which already has a commercial character.
- 7.3.6 There is an existing closed boarded fence which has been erected along the eastern boundary of the site fronting Oxhey Lane. It is considered that this is an incongruous feature within the streetscene, at odds with the more informal and verdant style of boundary treatments evident in the locality. As part of the application process amended plans have been received to replace this with mesh metal fencing which would be erected 'site side' of the red line boundary with enhanced vegetation 'road side' in order to further mitigate it's visual impact and soften the road frontage along Oxhey Lane. This would also provide some screening of the vehicles which are parked parallel with Oxhey Lane. Owing to the height of the minibuses, which would be parked for a greater length of the boundary, their roofs would be evident however in time the planting would establish along the boundary in order to provide more robust screening and reduce any adverse visual impact.
- 7.3.7 Turning to the existing area of parking, as set out above this fails to accord with the approved plans granted via 20/0748/FUL. The main deviations include the proximity of the parking area to the boundary and that it has been constructed at a higher level than approved (by approx. 2m). It is acknowledged that the planting between the boundary with Little Oxhey Lane has in recent years established however its effectiveness as screening is seasonal and certainly not as originally planned if the planning permission was lawfully implemented. In turn owing to the height of the coaches and their siting at an elevated land level they have become increasingly visible towards the junction. In order to mitigate this some of the coach parking has been relocated into the centre of the site, however, 5 coaches are still proposed to be parking in this area. There is insufficient space between the hardsurfacing and the boundary for any additional meaningful planting. As such the

evidence of coaches at an elevated height, in this location, does result in some isolated harm arising from the incongruity of the evidence of vehicles.

- 7.3.8 It is not considered that the extensions to the bungalow in situ has resulted in its appearance being unduly prominent or incongruous so to result in harm in this respect.
- 7.3.9 There are Listed Buildings to the south of the site towards Harrow. Namely: London Coal Duty Market x 2, Stables in the grounds of Melodies and Oxhey Lane Farmhouse. However owing to their siting relative to the proposed development it is not considered that any unacceptable adverse impacts would result to their setting.
- 7.3.10 Overall, it is considered that the proposal would have some adverse impacts on the character of the locality. This is by reason of the evidence of coaches parked at an elevated land level adjacent to the junction and the urbanising nature of the development spreading into the southern side of the site. Whilst this would be a level of isolated harm proposal would still conflict with Policy CP12 of the Core Strategy and Policy DM7 of the DMP LDD. This is discussed further in the planning balance section below.

7.4 Loss of C3 Use.

- 7.4.1 The proposal would include the total loss of residential accommodation within the existing bungalow. This floorspace has been used ancillary to the use of the rest of the 'bungalow' which operates as offices and training rooms. The floorspace that this lawfully remains within is now minimal however there would still be a technical loss of 1 dwelling. The district fails to have a 5 year housing land supply and thus there is an acute need for residential accommodation within the district as a whole. Whilst the loss of any residential dwelling would ordinarily be objected to in principle, in this case the residential dwelling is located in the centre of an established commercial business in a building which largely operates in conjunction with this. As such would not be desirable nor would it provide a good quality of accommodation for future occupiers. The loss of the C3 use is regrettable however this is tempered by the site circumstances and the lack of practical functionality of a residential use. As such in this case it is not considered that this element of the proposal is unacceptable.

7.5 Impact on amenity of neighbours

- 7.5.1 Policy CP12 of the Core Strategy states that the Council will expect all development proposal to protect residential amenities. Likewise, Policy DM9 of the Development Management Policies LDD states that planning permission will not be granted for development which has an unacceptable adverse impact on the indoor and outdoor acoustic environment or planned development and that external lighting does not have an unacceptable impact on neighbouring or nearby properties. Policy DM9 of the Development Management Policies LDD states that development proposals which include external lighting should ensure that there is no unacceptable adverse impact on neighbouring or nearby properties.
- 7.5.2 The closest residential properties to the application site are Laycot and Valley View which are located immediately opposite, separated by Oxhey Lane to the north east.
- 7.5.3 To avoid unacceptable vehicle movements late at night which could have an adverse noise impact when background levels are at their lowest it would be reasonable to restrict the hours of use in the event of an approval. The current hours for the use of the parking area are conditioned via 20/0748/FULat 06:00 and 19:00 Mondays to Fridays (inclusive) and 08:00-19:00 Saturdays and no vehicular movements whatsoever shall occur on Sundays or Bank or Public Holidays. It is considered reasonable to reapply this condition to the existing and new portions in order to protect neighbouring amenity.

- 7.5.4 The property opposite the site on Little Oxhey Lane is Carpenders Park Garden Centre. The development by virtue of its use would not have a detrimental impact on this property.
- 7.5.5 To mitigate impacts on neighbouring amenity, it would be reasonable to request specific details of the external lights and their light spill. However this is mitigated to some degree by the height at 1.8m being relatively low, and restrictions on the use of the new parking area which should avoid unacceptable impacts to residential amenity. Nevertheless, specific details will be sought by condition to ensure the mitigation is adequate.
- 7.5.6 As a result, subject to planning conditions protecting neighbouring amenity, it is not considered that the development would be harmful to nearby properties.

7.6 Wildlife and Biodiversity

- 7.6.1 Section 40 of the Natural Environment and Rural Communities Act 2006 requires Local Planning Authorities to have regard to the purpose of conserving biodiversity. This is further emphasised by regulation 3(4) of the Habitat Regulations 1994 which state that Councils must have regard to the strict protection for certain species required by the EC Habitats Directive.
- 7.6.2 The protection of biodiversity and protected species is a material planning consideration in the assessment of applications in accordance with Policy CP9 of the Core Strategy (adopted October 2011) and Policy DM6 of the DMLDD. National Planning Policy requires Local Authorities to ensure that a protected species survey is undertaken for applications that may be affected prior to determination of a planning application.
- 7.6.3 The application has been submitted with a Biodiversity Checklist and ecological reports. Herts Ecology have reviewed the submitted details and have concluded that the site has low ecological implications. There is some potential for the presence of slow worms however it is considered that this can be dealt with by way of condition requiring a CEMP (careful working methods and pre-commencement interventions). Conditions will also be added to ensure the lighting is controlled by hours of use to mitigate adverse impacts to Bats.

7.7 Trees and Landscaping

- 7.7.1 Policy DM7 of the Development Management Policies LDD states that proposals for new development should be submitted with landscaping proposal which seek to retain trees and other important landscape and nature conservation features. Landscaping proposals should also include new trees and other planting to enhance the landscape of the site and its surroundings as appropriate. It goes on to state that development proposals on sites which contain existing trees and hedgerows will be expected to retain as many trees and hedgerows as possible, particularly those of local amenity or nature conservation value or hedgerows considered to meet the criteria of the Hedgerow Regulations 1997.
- 7.7.2 A number of individual protected trees exist along the site boundaries of Little Oxhey Lane (TPO291) and Oxhey Lane (T533). Owing to their siting and the location of the existing hardstanding it is not considered that any adverse impacts would result to these trees as a result of the development.
- 7.7.3 The application has been accompanied by an Arboricultural Impact Assessment. The report outlines that an elder shrub, 3 goat willows, a section of laurel hedge would be removed in order to facilitate the proposed development. These are also category C. As such their removal is not resisted.
- 7.7.4 Furthermore, the proposal includes significant amounts of additional planting within the site which would compensate for the loss of these items. This includes additional planting along the southern boundary of the site together with the boundary with Oxhey Lane. The

southern boundary would include a native hedgerow with meadow planting in with a grassland mix.

7.8 Highways, Access and Parking

- 7.8.1 Policy CP10 of the Core Strategy (adopted October 2011) states that all development should demonstrate that it provides a safe and adequate means of access. The NPPF at policy TR6 sets out that development should be refused where it would result in unacceptable impacts to highway safety.
- 7.8.2 In respect of access, the proposed development would utilise the existing vehicle access from Little Oxhey Lane. The proposal has been reviewed by HCC Highways who consider that the existing access would be suitable to accommodate the proposed level of development. An emergency access would be retained on Oxhey Lane and conditioned.
- 7.8.3 In respect to traffic impacts the application has been accompanied by a transport statement. This has also been reviewed by the Highway's Officer who considers that the impact of the proposed operations on the surrounding network would not be unacceptable.
- 7.8.4 As set out in section 7.2 above the proposed development also includes the provision of a new footway outside of the site (on Little Oxhey Lane) and a crossing point. This would be secured by a S278 agreement and would include the submission of a Stage One Road Safety Audit.
- 7.8.5 The Highway's Officer has also reviewed the internal layout of the site and considers that the manoeuvring and emergency access arrangements are considered acceptable.
- 7.8.6 In respect to parking Appendix 5 of the DMP LDD sets out parking standards. Appendix 5 sets out that sui generis uses will be assessed on their own merits. The nature of the proposed development is such that it aims to provide sufficient on-site parking for the fleet of vehicles operated by Lucketts. Thus, it is considered to align with the aims of Appendix 5.

7.9 Energy Use

- 7.9.1 Policy CC2 and CC3 of the NPPF set out the expectations for development in order to mitigate climate change. This includes design approaches which conserve energy and other resources and take advantage of opportunities to draw low carbon energy.
- 7.9.2 Policy CP1 of the Core Strategy requires the submission of an Energy and Sustainability Statement demonstrating the extent to which sustainability principles have been incorporated into the location, design, construction and future use of proposals and the expected carbon emissions.
- 7.9.3 Policy DM4 of the DMLDD requires applicants to demonstrate that development will produce 5% less carbon dioxide emissions than Building Regulations Part L (2013) requirements having regard to feasibility and viability. This may be achieved through a combination of energy efficiency measures, incorporation of on-site low carbon and renewable technologies, connection to a local, decentralised, renewable or low carbon energy supply. The policy states that from 2016, applicants will be required to demonstrate that new residential development will be zero carbon. However, the Government has announced that it is not pursuing zero carbon and the standard remains that development should produce 5% less carbon dioxide emissions than Building Regulations Part L (2013) requirements having regard to feasibility and viability.
- 7.9.4 An energy statement has been submitted with the application which confirms that the proposal will result in an energy saving of 48% thus exceeding the minimum policy requirements of DM4. A condition will be added to ensure the development is carried out in accordance with the details submitted.

7.10 Biodiversity Net Gain

7.10.1 Paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990 sets out that every planning permission granted for the development of land in England shall be deemed to have been granted subject to the 'biodiversity gain condition' requiring development to achieve a net gain of 10% of biodiversity value. This is subject to exemptions as set out in The Biodiversity Gain Requirements (Exemptions) Regulations 2024.

7.10.2 In this case Biodiversity Net Gain is applicable to the proposed development. Herts Ecology have reviewed the submitted information and consider that the LPA has sufficient information to determine the application subject to a BNG plan condition. Off site credits are required in order to meet the mandatory BNG. A Habitat management and monitoring plan (HMMP) has been requested by Herts Ecology however this is not considered reasonable given the requirement for purchasing off site credits.

7.11 Flood Risk and Drainage

7.11.1 Policy DM9 of the Development Management Policies LDD states that development will only be permitted where it would not be subject to unacceptable risk of flooding; and would unacceptably exacerbate risk of flooding elsewhere.

7.11.2 The application site is located within Flood Risk Zone 1. However, as it is a major development the submission of an FRA is required to deal with SUDs. The LLFA originally objected to the proposed development however additional information has been submitted during the application. The proposed drainage strategy includes the provision of an attenuation pond which would be located in the south western corner of the site where the land level is at its lowest. The LFFA have reviewed the additional information and considered that on this basis they raise no objection subject to the attachment of a number of conditions.

7.12 Refuse and Recycling

7.12.1 Policy DM10 (Waste Management) of the DMLDD advises that the Council will ensure that there is adequate provision for the storage and recycling of waste and that these facilities are fully integrated into design proposals. New developments will only be supported where:

- i) The siting or design of waste/recycling areas would not result in any adverse impact to residential or work place amenity
- ii) Waste/recycling areas can be easily accessed (and moved) by occupiers and by local authority/private waste providers
- iii) There would be no obstruction of pedestrian, cyclists or driver site lines

7.12.2 Details of refuse and recycling arrangements will be required to be submitted via condition which would be collected commercially. However, it is considered that there is sufficient space within the site for refuse storage and owing to the nature of the operations within the site that a refuse vehicle would be able to enter and exit the site in a forward gear

7.13 Planning balance

7.14 As outlined above Officers conclude that the proposed development would be acceptable in all regards. It is concluded that the proposal would comprise appropriate development in the Green Belt by virtue of its compliance with policy GB7 (g). However it is considered that there is some harm to the rural character of the area as expressed in section 7.3 above.

7.15 However, were members to reach an alternative stance in respect to any of the considerations above any identified harm would need to be weighed against the benefits of the scheme, and potentially consider whether any very special circumstances are required should it be determined that the development is inappropriate in the Green Belt.

7.16 As set out with section 7.2 there are material considerations in favour of the development. These include a demonstrable unmet need across the county for the specialist transport services provided by the applicant's business towards which the development proposal would support the sustainability of. Whilst it has not been concluded that were the development not to take place that the existing business would cease operations it would be constrained in its expansion and in turn limited to the contribution it can make to providing the special services across the district and wider county. Furthermore the applicant also sets out that the business supports a significant amount of jobs and the proposal would support in maintaining the existing local business. Additionally the continuation of the service would bring on going benefits to SEND individuals and their families. As such the scheme has economic and social benefits.

7.17 Policy S5 (Principle of development outside settlements) is not applicable as the application site falls on land within the Green Belt. However, at S5(5) states:

However, where development would not be inappropriate in these locations (through the application of policies HC8 and GB7), proposals should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework, and applying paragraph 2 of this policy .

7.18 Policy S5(2) states the circumstances in which the benefits of approving development proposals are likely to **be substantially outweighed by adverse effects** include, but are not restricted to, situations where the development proposal would fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.

7.19 In conclusion it is considered that the benefits are not substantially outweighed by the adverse effects arising from the scheme in the context of Policy S5.

8 Recommendation

8.1 That part retrospective PLANNING PERMISSION BE GRANTED subject to the following conditions:

C1 Those part of the development hereby permitted which have not commenced shall be begun within THREE YEARS of the date of this permission (with the exception of works pertaining to Conditions 3, 4, 5 and 6).

Reason: In pursuance of Section 91(1) of the Town and Country Planning Act 1990 and as amended by the Planning and Compulsory Purchase Act 2004.

C2 The development hereby permitted shall be carried out in accordance with the following approved plans: 201304/PL/801, B24054-TLP-101 Rev 5, 201304 / PL / 804 REV B, 201304 / PL / 805 REV B, 201304 / PL / 806 REV B, TRDC 001 (Location Plan).

Reason: For the avoidance of doubt, in the proper interests of planning and to ensure the development maintains the character of the area and the visual amenities of the Green Belt in accordance with Policies CP1, CP2, CP6, CP9, CP10, CP11 and CP12 of the Core Strategy (adopted October 2011) and Policies DM2, DM3, DM4, DM6, DM7, DM9, DM13 and Appendices 2 and 5 of the Development Management Policies LDD (adopted July 2013).

C3 Within FOUR MONTHS from the date of this permission, the parking area falling within the northern section of the application site (referred to as The Paddock on the submitted plans), shall be clearly laid out and demarcated in accordance with plan

number B24054-TLP-101 Rev 5, and shall thereafter be retained as per the approved demarcation and made available for use only in association with the use of the application site.

Reason: To ensure that the impacts on the character of the area are mitigated in accordance with Policies CP1 and CP12 of the Core Strategy (adopted October 2011).

- C4 Following completion of the works required by Condition 3 (parking demarcation), the native hedge and tree planting shown on drawing number B24054-TLP-101 Rev 5 shall be carried out before the end of the first planting and seeding season following completion of those works.

If any existing tree shown to be retained, or the proposed soft landscaping, are removed, die, become severely damaged or diseased within five years of the completion of development they shall be replaced with trees or shrubs of appropriate size and species in the next planting season (ie November to March inclusive).

Reason: To mitigate the visual impact of the new boundary treatment to enhance the appearance of the frontage along Little Oxhey Lane in accordance with Policies CP1 and CP12 of the Core Strategy (adopted October 2011).

- C5 Within SIX MONTHS of the date of this permission, the alterations to the boundary treatment along Oxhey Lane (namely the replacement of the closed timber fencing with wire mesh fencing (RAL 6005)) as shown on plan number B24054-TLP-101 Rev 5 shall be undertaken and thereafter retained in terms of design, siting and height.

Reason: To ensure that the external appearance of the development is satisfactory in accordance with Policies CP1 and CP12 of the Core Strategy (adopted October 2011) and Policy DM1 and Appendix 2 of the Development Management Policies LDD (adopted July 2013).

- C6 Following completion of the works required by Condition 5 (the erection of the new wire mesh fencing), the native hedge and tree planting shown on drawing number B24054-TLP-101 Rev 5 shall be carried out before the end of the first planting and seeding season following completion of those works and maintained so long as the wire mesh fencing is in situ.

If any existing tree shown to be retained, or the proposed soft landscaping, are removed, die, become severely damaged or diseased within five years of the completion of development they shall be replaced with trees or shrubs of appropriate size and species in the next planting season (ie November to March inclusive).

Reason: To mitigate the visual impact of the new boundary treatment to enhance the appearance of the frontage along Oxhey Lane in accordance with Policies CP1 and CP12 of the Core Strategy (adopted October 2011).

- C7 Part A

Notwithstanding the details indicated on the submitted drawings no on-site works above slab level shall commence until a detailed scheme for the necessary offsite highway improvement works have been submitted to and approved in writing by the Local Planning Authority.

These works shall include:

- The new 2m wide stretch of highway footway fronting the site;

- Pedestrian crossing point made up of pedestrian dropped kerbs and tactile paving on either side of Little Oxhey Lane.

Part B

Prior to the first use of the development hereby permitted the offsite highway improvement works referred to in Part A of this condition shall be completed in accordance with the approved details.

Reason: In the interests of highway safety and convenience in accordance with Policies CP1 and CP10 of the Core Strategy (adopted October 2011) and Policy TR3 of the NPPF.

C8 No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to and approved in writing by the Local Planning Authority. The Statement shall provide for:

- i. parking of vehicles of site operatives and visitors
- ii. construction of access arrangements including the routing of vehicles
- iii. loading and unloading of plant and materials
- iv. storage of plant and materials used in constructing the development
- v. the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate
- vi. wheel washing facilities
- vii. measures to control the emission of dust and dirt during construction
- viii. a scheme for recycling/disposing of waste resulting from demolition and construction works
- ix. Details of any temporary refuse and recycling collection arrangements which ensure refuse and recycling collection access are available to all occupied properties at each stage of the works.

The approved Construction Method Statement shall be adhered to throughout the construction period.

Reason: This condition is a pre commencement condition in the interests of highway safety and convenience in accordance with Policies CP1 and CP10 of the Core Strategy (adopted October 2011) and Policy DM10 of the Development Management Policies LDD (adopted July 2013).

C9 Notwithstanding the details set out on B24054-TLP-101 Rev 5 and soft landscaping subject to Conditions 4 and 6, no development shall take place until there has been submitted to and approved in writing by the Local Planning Authority a scheme of soft landscaping, which shall include the location of all existing trees and hedgerows affected by the proposed development, and details of those to be retained, together with a scheme detailing measures for their protection in the course of development. The scheme shall include details of size, species, planting heights, densities and positions of any proposed soft landscaping.

All soft landscaping works required by the approved scheme shall be carried out before the end of the first planting and seeding season following first occupation of any part of the buildings or completion of the development, whichever is sooner.

If any existing tree shown to be retained, or the proposed soft landscaping, are removed, die, become severely damaged or diseased within five years of the completion of development they shall be replaced with trees or shrubs of appropriate size and species in the next planting season (ie November to March inclusive).

Reason: This condition is required to ensure the completed scheme has a satisfactory visual impact on the character and appearance of the area in accordance with Policies CP1 and CP12 of the Core Strategy (adopted October 2011) and Policy DM6 of the Development Management Policies LDD (adopted July 2013).

- C10 Prior to the commencement of any development on site in connection with the additional parking area, full details of all external lighting including details of the position, height, design, spillage and intensity (including any affixed to the new building) shall be submitted to and approved in writing by the Local Planning Authority.

The lighting shall thereafter be installed only in accordance with the approved details and shall not be used outside of the hours of operation (06:00 and 19:00 Mondays to Fridays (inclusive) and 08:00-19:00 Saturdays and not at all Sundays or Bank Holidays) and no further external lighting to the additional parking area shall be installed thereafter.

Reason: In the interests of visual amenity and biodiversity and to meet the requirements of Policies CP1, CP9 and CP12 of the Core Strategy (adopted October 2011) and Policies DM6 and DM9 of the Development Management Policies LDD (adopted July 2013).

- C11 Prior to the first use of the additional parking area (referred to as Green Acre on the submitted plans) hereby permitted the proposed on-site car parking and turning areas shall be laid out, demarcated, surfaced and drained in accordance with the approved plans and retained thereafter made available for use only in association with the use of the application site.

Reason: To ensure construction of a satisfactory development and in the interests of highway safety in accordance with Policy CP10 of the Core Strategy (adopted October 2011) and Policy DM13 of the Development Management Policies LDD (adopted July 2013).

- C12 No vehicular movements shall occur within any of the parking areas hereby permitted and as shown on Drawing B24054-TLP-101 Rev 5 outside the hours of 06:00 and 19:00 Mondays to Fridays (inclusive) and 08:00-19:00 Saturdays and no vehicular movements whatsoever shall occur on Sundays or Bank or Public Holidays.

Reason: To safeguard the residential amenities of the occupiers of neighbouring properties in accordance with Policies CP1 and CP12 of the Core Strategy (adopted October 2011) and Policy DM9 of the Development Management Policies LDD (adopted July 2013).

- C13 The vehicular access onto Oxhey Lane shall only be used in the event of an emergency and at no other time.

Reason: To safeguard highway safety and the free flow of traffic in accordance with Policy CP10 of the Core Strategy (adopted October 2011) and Policy DM13 of the Development Management Policies LDD (adopted July 2013).

- C14 The parking area hereby permitted B24054-TLP-101 Rev 5 shall be used solely in connection with the business operating from the buildings existing and proposed and for no other purpose.

Reason: In granting this permission the Local Planning Authority has had regard to the special circumstances of the case and the need to safeguard the amenities of the Green Belt and the surrounding areas in accordance with Policies CP1, CP2, CP3,

CP6, CP8, CP9, CP10, CP11 and CP12 of the Core Strategy (adopted October 2011), Policy SA1 of the Site Allocations Local Development Document (adopted November 2014) and Policies DM2, DM4, DM6, DM7, DM8, DM9, DM13 and Appendices 2 and 5 of the Development Management Policies LDD (adopted July 2013).

- C15 Prior to commencement of the development hereby permitted, a Construction Ecological Management Plan shall be submitted to and approved in writing by the Local Planning Authority.

The CEMP should detail how the mitigation measures recommended within the Preliminary Ecological Appraisal will be incorporated within the development scheme.

The CEMP shall include details of how the habitats adjacent to the development will be protected during the construction period given its proximity to the proposed development. The development shall then be carried out in accordance with the approved details and the measures retained thereafter.

Reason: To maintain wildlife habitat and to meet the requirements of Policies CP1, CP9 and CP12 of the Core Strategy (adopted October 2011) and Policy DM6 of the Development Management Policies LDD (adopted July 2013).

- C16 A Species enhancement plan as more particularly outlined in EclA 7.5 shall be submitted to and approved in writing by the Local Planning Authority. The agreed measures shall be implemented in accordance with the approved details.

Reason: To maintain wildlife habitat and to meet the requirements of Policies CP1, CP9 and CP12 of the Core Strategy (adopted October 2011) and Policy DM6 of the Development Management Policies LDD (adopted July 2013).

- C17 Prior to the commencement of development, construction drawings of the surface water drainage network, associated sustainable drainage components and flow control mechanisms and a construction method statement shall be submitted and agreed in writing by the local planning authority. The scheme shall then be constructed as per the agreed drawings, method statement and FRA & Drainage Strategy and remaining in perpetuity for the lifetime of the development.

Reason: To prevent pollution of the water environment and provide a sustainable system of water drainage and management to meet the requirements of Policy CP1 of the Core Strategy (adopted October 2011) and Policies DM8 and DM9 of the Development Management Policies LDD (adopted July 2013).

- C18 The development hereby approved shall not be occupied until details of the maintenance and management of the Sustainable Drainage Scheme (SuDS) in accordance with National SuDS Standard 7 have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the network in addition to those listed in SuDS Standard 7 to be submitted for approval shall include:

- A timetable for its implementation.
- Details of SuDS feature and connecting drainage structures and maintenance requirement for each aspect including a non-technical labelled drawing showing where they are located and how to access them.

- A management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. This will include the name and contact details of any appointed management company.

Reason: To prevent pollution of the water environment and provide a sustainable system of water drainage and management to meet the requirements of Policy CP1 of the Core Strategy (adopted October 2011) and Policies DM8 and DM9 of the Development Management Policies LDD (adopted July 2013).

C19 Upon completion of the surface water drainage scheme and prior to the first occupation of the development, a detailed verification report, (appended with substantiating evidence demonstrating the approved construction details and specifications have been implemented in accordance with the surface water drainage scheme), has been submitted to and approved (in writing) by the Local Planning Authority. The survey and report shall demonstrate that the surface water drainage system has been constructed in accordance with the details approved and shall include as a minimum.

- CCTV survey of underground structures,
- A full set of “as built” drawings highlighting any minor changes to the approved drawings.
- Photographs of excavations (including soil profiles/horizons) and any installation of any surface water drainage structures and control mechanisms.

Where necessary, details of corrective works to be carried out along with a timetable for their completion, shall be included for approval in writing by the Local Planning Authority. Any corrective works required shall be carried out in accordance with the approved timetable and subsequently re-surveyed with the findings submitted to and approved in writing by the Local Planning Authority.

Reason: To prevent pollution of the water environment and provide a sustainable system of water drainage and management to meet the requirements of Policy CP1 of the Core Strategy (adopted October 2011) and Policies DM8 and DM9 of the Development Management Policies LDD (adopted July 2013).

C20 The development shall not be occupied until a scheme for the separate storage and collection of waste has been submitted to and approved in writing by the Local Planning Authority. Details shall include siting, size and appearance of refuse and recycling facilities on the premises. The development hereby permitted shall not be occupied until the approved scheme has been implemented and these facilities should be retained permanently thereafter.

Reason: To ensure that satisfactory provision is made, in the interests of amenity and to ensure that the visual appearance of such provision is satisfactory in compliance with Policies CP1 and CP12 of the Core Strategy (adopted October 2011) and Policies DM10 and Appendix 2 of the Development Management Policies document (adopted July 2013).

C21 The building hereby permitted shall not be erected other than in the materials as have been approved in writing by the Local Planning Authority as shown on the approved plan and as set out in the application form no external materials shall be used other than those approved.

Reason: To ensure that the external appearance of the building is satisfactory in accordance with Policies CP1 and CP12 of the Core Strategy (adopted October 2011) and Policy DM1 and Appendix 2 of the Development Management Policies LDD (adopted July 2013).

- C22 Prior to the first occupation of the new building hereby permitted, details of provision for the secure storage of bicycles shall be submitted to and approved in writing by the Local Planning Authority. The storage shall be provided prior to the first occupation of the new buildings, in accordance with the approved details and shall be permanently retained as such thereafter.

Reason: To ensure that secure bicycle storage facilities are provided to encourage use of sustainable modes of travel in accordance with Policies CP1, CP10 and CP12 of the Core Strategy (adopted October 2011) and Policy DM13 and Appendix 5 of the Development Management Policies LDD (adopted July 2013).

8.2 **Informatives:**

- I1 With regard to implementing this permission, the applicant is advised as follows:

All relevant planning conditions must be discharged prior to the commencement of work. Requests to discharge conditions must be made by formal application which includes a fee.

There may be a requirement for the approved development to comply with the Building Regulations. Please contact Hertfordshire Building Control (HBC) on 0208 207 7456 or at buildingcontrol@hertfordshirebc.co.uk who will be happy to advise you on building control matters and will protect your interests throughout your build project by leading the compliance process. Further information is available at www.hertfordshirebc.co.uk.

Community Infrastructure Levy (CIL) - Your development may be liable for CIL payments and you are advised to contact the CIL Officer for clarification with regard to this. It is a requirement under Regulation 67 (1), Regulation 42B(6) (in the case of residential annexes or extensions), and Regulation 54B(6) (for self-build housing) of The Community Infrastructure Levy Regulations 2010 (As Amended) that a Commencement Notice (Form 6) is submitted to Three Rivers District Council as the Collecting Authority no later than the day before the day on which the chargeable development is to be commenced. DO NOT start your development until the Council has acknowledged receipt of the Commencement Notice. Failure to do so will mean you will lose the right to payment by instalments (where applicable), lose any exemptions already granted, and a surcharge will be imposed.

Care should be taken during the building works hereby approved to ensure no damage occurs to the verge or footpaths during construction. Vehicles delivering materials to this development shall not override or cause damage to the public footway. Any damage will require to be made good to the satisfaction of the Council and at the applicant's expense.

Where possible, energy saving and water harvesting measures should be incorporated. Any external changes to the building which may be subsequently required should be discussed with the Council's Development Management Section prior to the commencement of work.

- 12 The applicant is reminded that the Control of Pollution Act 1974 allows local authorities to restrict construction activity (where work is audible at the site boundary). In Three Rivers such work audible at the site boundary, including deliveries to the site and running of equipment such as generators, should be restricted to 0800 to 1800 Monday to Friday, 0900 to 1300 on Saturdays and not at all on Sundays and Bank Holidays.
- 13 The Local Planning Authority has been positive and proactive in its consideration of this planning application, in line with the requirements of the National Planning Policy Framework and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015. The development maintains/improves the economic, social and environmental conditions of the District.
- 14 The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition "(the biodiversity gain condition)" that development may not begin unless:
- a) a Biodiversity Gain Plan has been submitted to the planning authority, and
 - b) the planning authority has approved the plan.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be Three Rivers District Council.

Based on the information available, this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply.

Where the local planning authority considers that the permission falls within paragraph 19 of Schedule 7A to the Town and Country Planning Act 1990, the permission which has been granted has the effect of requiring or permitting the development to proceed in phases. The modifications in respect of the biodiversity gain condition which are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024 apply.

Biodiversity gain plans are required to be submitted to, and approved by, the planning authority before development may be begun, and, if subject to phased development, before each phase of development may be begun (Phase Plans).

If the onsite habitat includes irreplaceable habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements for the content and approval of Biodiversity Gain Plans. The Biodiversity Gain Plan must include, in addition to information about steps taken or to be taken to minimise any adverse effect of the development on the habitat, information on arrangements for compensation for any impact the development has on the biodiversity of the irreplaceable habitat.

The planning authority can only approve a Biodiversity Gain Plan if satisfied that the adverse effect of the development on the biodiversity of the irreplaceable habitat is minimised and appropriate arrangements have been made for the purpose of compensating for any impact which do not include the use of biodiversity credits.

More information can be found in the Planning Practice Guidance online at <https://www.gov.uk/guidance/biodiversity-net-gain>.

- 15 Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the appropriate authority. It is advised to discuss proposals for any works at an early stage of proposals.

Both FEH13 and FEH22 are currently accepted to support drainage modelling calculations. For the avoidance of doubt the use of FSR and FEH1999 data has been superseded and therefore, use in rainfall simulations are not accepted.

- 16 Agreement with Highway Authority: 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 the access and associated road improvements. The construction of such 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. 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>
- 17 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.
- 18 Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the 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/business-licences/business-licences.aspx>