

PLANNING COMMITTEE – 21 OCTOBER 2021

PART I - DELEGATED

- 12. 21/1542/FUL – Single storey front infill extension, roof extension including hip to gable alterations, insertion of front dormer and rooflights, insertion of rear dormer and insertion of first floor flank windows at WOOD VIEW, 11 GREENBURY CLOSE, CHORLEYWOOD, WD3 5QT.**

(DCES)

Parish: Chorleywood Parish Council.

Ward: Chorleywood North and Sarratt

Expiry of Statutory Period: 23.08.2021 (EOT
28.10.2021)

Case Officer: Freya Clewley

Recommendation: That Planning Permission be Granted.

Reason for consideration by the Committee: Called in unless Officers are minded to refuse by Chorleywood Parish Council for the reasons set out at 4.1.1 below.

1 Relevant Planning History

- 1.1 No relevant planning history.

2 Description of Application Site

- 2.1 The application site is irregular in shape and contains a detached bungalow located on the south western side of the northern spur to Greenbury Close, Chorleywood. Greenbury Close is accessed via Green Street and is a residential cul-de-sac characterised by detached bungalows of varying architectural styles and designs, many of which have been extended or altered.
- 2.2 The host dwelling is finished in mixed brickwork with a dark tiled hipped roof form. There is an existing single storey conservatory to the western flank of the dwelling, and a single storey flat roofed garage to the eastern flank. There is an existing pitched roof porch to the centre of the front elevation and hardstanding to the application site frontage with space for two vehicles to park. Land levels fall to the rear of the site.
- 2.3 The neighbour to the north west, number 12 Greenbury Close, is set back from the host dwelling and is set in from the shared boundary with the application site. This neighbour has an existing front dormer window, and is orientated such that the rear elevation faces away from the application site.
- 2.4 The neighbour to the east, number 10 Greenbury Close, is set forward from the host dwelling. This neighbour is located on the same land level as the host dwelling and its rear elevation faces south-west. The application dwelling is angled in its plot such that its rear elevation faces south, toward the rear amenity area of No. 10.

3 Description of Proposed Development

- 3.1 Full planning permission is sought for the construction of a single storey front infill extension, and a roof extension including hip to gable alterations, insertion of front dormer and rooflights, rear dormer and first floor flank windows. The proposal would result in a four bedroom dwelling (two additional bedrooms).
- 3.2 The proposed front extension would infill the currently recessed aspect between the front porch and the existing minimal front projection. The extension would have a depth of 0.5m and a width of 2.2m. This element would be incorporated under the main roofslope of the

dwelling and would remain set back from the front wall of the front porch. A window is proposed within the front elevation of the extension.

- 3.3 The proposed roof extension would include hip to gable roof extensions. The hip to gable roof extensions would increase the width of the ridge by 4m to the east and west, with an overall ridge width of 10m. Gable ends would be created to both flank elevations of the host dwelling. A window is proposed within each gable end at first floor level.
- 3.4 The proposal would include the insertion of a pitched roof dormer window within the front roofslope. The dormer would have a width of 1.8m, a depth of 2m and a height of 2.1m. A two-casement window is proposed within the dormer. The dormer would be set down 0.3m from the ridge of the host dwelling. Two rooflights are proposed within the front roofslope of the dwelling, either side of the proposed dormer window.
- 3.5 The proposed rear dormer would have a flat roof form, with a width of 7.4m, a depth of 2.4m and a height of 1.8m. A Juliet balcony with French doors, and an angled window are proposed within the rear elevation of the dormer. It would be set down 1m from the ridge of the host dwelling.
- 3.6 Amended plans were sought and received during the course of the application to reduce the number of front dormers from three to one, replacing two of the originally proposed front dormers with rooflights, alter the proposed roof extensions from hip to Dutch hip extensions to hip to gable extensions, and reduce the width of the rear dormer.

4 Consultation

4.1 Statutory Consultation

4.1.1 Chorleywood Parish Council: [Objection]

*The Committee had Objections with this application on the following grounds and wish to CALL IN, unless the Officer are minded to refuse planning permission.
Should the plans or supporting information be amended by the Applicant, please advise the Parish Council so the comments can be updated to reflect the amended proposal.*

' Development is sited in an area listed within Policy 4 of the Chorleywood Neighbourhood Development Plan and results in the conversion of a bungalow into a multi-level dwelling which would not be suitable for older persons or those with disabilities. As such, it is not compliant with the requirements of policy 4.1 as it would result in a diminishment of the supply of housing suitable for older and disabled persons and there has been no replacement or other increase in such properties in the district to offset this.

' The development would be out of keeping with the current street scene as required under the Design Criteria contained in Appendix 5 of the Development Management Policies.

' The property offers insufficient parking (as defined in Appendix 5 of the Development Management Policies) as only 2 parking spaces are available but 3 are required."

Officer Note: Following receipt of amended plans, the Parish Council were re-consulted on this application. No further comments have been received at the time of drafting this report and any comments received will be verbally reported at the Committee meeting.

4.1.2 National Grid: No response received.

4.1.3 London Underground Infrastructure Protection: [No Objection]

4.2 Public/Neighbour Consultation

4.2.1 Number consulted: 5

4.2.2 No of responses received: 1 objection

4.2.3 Site Notice: Expired: 26.07.2021 Press notice: N/A

4.2.4 Summary of Responses:

- Proposed property is described as a chalet bungalow however it is more like a house and out of keeping to other properties in the road.
- Building should be smaller.
- Suggestions that the elevations are inaccurate.
- Frontage would be out of keeping.
- Many bungalows have added a room in their roof, some with dormers, however the proposal is much larger and seems like a conversion from a bungalow to a house on a small plot.

4.2.5 Following receipt of amended plans, neighbours and the Parish Council have been consulted again. No further responses have been received at the time of drafting this report, and any additional responses will be reported verbally at the Committee meeting.

5 Reason for Delay

5.1 Amended plans sought and received, and neighbours and the Parish Council were consulted on the amended plans.

6 Relevant Planning Policy, Guidance and Legislation

6.1 National Planning Policy Framework and National Planning Practice Guidance

In 2021 the new National Planning Policy Framework was published. This is read alongside the National Planning Practice Guidance (NPPG). The determination of planning applications is made mindful of Central Government advice and the Local Plan for the area. It is recognised that Local Planning Authorities must determine applications in accordance with the statutory Development Plan, unless material considerations indicate otherwise, and that the planning system does not exist to protect the private interests of one person against another. The NPPF is clear that “existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework”.

The NPPF states that ‘good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities’. The NPPF retains a presumption in favour of sustainable development. This applies unless any adverse impacts of a development would ‘significantly and demonstrably’ outweigh the benefits.

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 policies of Three Rivers District Council reflect the content of the NPPF.

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, CP9, CP10 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 DM1, DM6, DM13 and Appendices 2 and 5.

The Chorleywood Neighbourhood Plan Referendum Version was adopted in August 2020. Relevant policies include: Policies 2 and 4.

6.3 Other

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

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.

7 Planning Analysis

7.1 Impact on Character and Street Scene

- 7.1.1 Policy CP1 of the Core Strategy (adopted October 2011) seeks to promote buildings of a high enduring design quality that respect local distinctiveness and Policy CP12 of the Core Strategy (adopted October 2011) relates to design and states that in seeking a high standard of design the Council will expect development proposals to 'have regard to the local context and conserve or enhance the character, amenities and quality of an area'. Development should make efficient use of land but should also respect the 'distinctiveness of the surrounding area in terms of density, character, layout and spacing, amenity, scale, height, massing and use of materials'; 'have regard to the local context and conserve or enhance the character, amenities and quality of an area' and 'incorporate visually attractive frontages to adjoining streets and public spaces'.
- 7.1.2 Policy DM1 and Appendix 2 of the Development Management Policies LDD (adopted July 2013) set out that development should not have a significant impact on the visual amenities of the area. Appendix 2 of the DMP LDD outlines that hip to gable extensions are discouraged in the case of semi-detached houses as it is considered that it unbalances the pair and results in a loss of symmetry. In some cases, the roof forms in a street may be uniform and therefore this type of alteration may erode the group value of the street and will not be supported by the Council. Dormer windows should always be subordinate to the main roof. They should be set below the existing ridge level, set in from either end of the roof and set back from the plane of the front or rear wall. The roof form should respect the character of the house if possible. Front dormers may not always be appropriate in the streetscene.
- 7.1.3 Policy 2 of the Chorleywood Neighbourhood Plan (referendum version, August 2020) states that all development should seek to make a positive contribution to the streetscene by way of frontage, building line, scale and design. Policy 4 of the Neighbourhood Plan states that it is recognised that various alterations can be made to properties without the need to apply for planning permission, commonly referred to as permitted development. In areas characterised by groups of bungalows those developments which require the submission of a planning application will be carefully assessed to ensure that the supply of housing suitable for older and disabled people is not diminished. This will usually mean that suitable bungalows will not be converted into multi-level dwellings.
- 7.1.4 The proposed front extension would infill a recessed aspect between the front porch and existing stepped front elevation. This element would have a depth of 0.5m and would not extend beyond the existing porch, and given the scale and design of this element, it is not

considered that the single storey front extension would result in any harm to the character or appearance of the host dwelling, streetscene or wider area.

- 7.1.5 The streetscene of Greenbury Close is varied in terms of the architectural styles and designs of the existing bungalows. In addition, many of the existing bungalows have implemented extensions to the roof space, with front and side dormers visible within the streetscene, including at numbers 1, 2, 6, 7, 9, 12 and 15 Greenbury Close. Whilst some of the neighbouring bungalows have retained a hipped roof form, there are gabled roof forms within the streetscene of Greenbury Close, including a gable feature to the front elevation of No. 14 opposite the application site. Therefore, whilst the proposed hip to gable extensions would alter the appearance of the host dwelling, given the existing variation within the streetscene of Greenbury Close, it is not considered that the proposed hip to gable alterations would result in harm to the character or appearance of the host dwelling, streetscene or wider area.
- 7.1.6 The proposal would include the insertion of a front dormer. The front dormer would be of a size and scale which would be proportionate within the front roofslope of the dwelling, set down from the ridge line, set up from the eaves and set in from the flank elevations, and as such, is considered to be a subordinate addition. Furthermore, given the existence of a variety of front dormer windows within the streetscene, it is not considered that the proposed front dormer would result in harm to the character or appearance of the host dwelling, streetscene or wider area. The proposed front rooflights are of a number and scale which would be proportionate, and would not result in any harm in this regard.
- 7.1.7 The proposed rear dormer would have a flat roof form, set down from the ridge, set up from the eaves and set in from the flank elevations of the host dwelling. As such, the rear dormer would be considered to be a subordinate addition within the rear roofslope. In addition, given the siting of this element, and the orientation of the host dwelling, the proposed rear dormer would not be visible from the streetscene of Greenbury Close, thus would not appear prominent. Therefore, it is not considered that the proposed rear dormer would result in any harm to the character or appearance of the host dwelling, streetscene or wider area.
- 7.1.8 The supporting text to Policy 4 of the Chorleywood Neighbourhood Plan outlines that, to protect the retention of bungalows, the policy will both maintain the character of these areas and ensure that the stock of dwellings for older and disabled persons is maintained. Greenbury Close is identified as one of the roads to meet this criteria. The supporting text also notes "It is important to be clear that, in seeking homes that are appropriate for older persons' needs, this does not mean that they must only be appropriate for the needs of older people. They can be designed such that they provide housing to address the needs of all types of people, old and young, but they must be capable of serving the needs of older people if such people choose to live in them". Policy 4.1 states that "in areas characterised by groups of bungalows those developments which require the submission of a planning application will be carefully assessed to ensure that the supply of housing suitable for older and disabled people is not diminished. This will usually mean that suitable bungalows will not be able to be converted into multi-level dwellings". The current application would introduce first floor accommodation to an existing bungalow, resulting in the creation of a chalet-style bungalow which would provide multi-level accommodation. However, it is not considered that the introduction of this multi-level accommodation would diminish the supply of housing suitable for older or disabled people. For example, the property would retain living accommodation (including WC and facilities for cooking and sleeping) on the ground floor, and further internal adjustments could be made without planning permission should additional facilities be required. Therefore, the property would remain capable of serving the needs of older people if such people chose to live in them, as identified as important in the policy's supporting text. There is nothing to suggest that the existing dwelling is particularly suitable for older or disabled people, in the same way that there is no suggestion that the proposed internal layout would not be suitable for older or disabled people.

- 7.1.9 On this basis, it is not considered that the addition of accommodation in the roof space of the existing bungalow would result in any demonstrable harm to the character or appearance of the host building, the street scene or the wider area. Furthermore it is not considered that the proposal would demonstrably diminish the supply of housing for older or disabled people. It is therefore considered that the development would comply with Policies CP1 and CP12 of the Core Strategy, Policies DM1 and Appendix 2 of the Development Management Policies document, the Chorleywood Neighbourhood Plan (referendum version, August 2020) and the NPPF (2021).
- 7.2 Impact on Amenity of Neighbours
- 7.2.1 Policy CP12 of the Core Strategy advises that development will be expected to protect residential amenity. Appendix 2 of the DMP LDD comments that all developments are expected to maintain acceptable standards of privacy for both new and existing residential buildings and development should not result in loss of light to the windows of neighbouring properties nor allow overlooking.
- 7.2.2 The proposed single storey front extension would not extend beyond the existing front porch, and would be sited centrally to the front elevation of the host dwelling. The front facing window would face the street. As such, given the scale and siting of the proposed extension, it is not considered that this element would result in any harm to neighbouring properties.
- 7.2.3 The proposed hip to gable roof extensions would create a gable end to the eastern and western flank elevations of the dwelling. However, given the spacing maintained between the host dwelling and both neighbouring dwellings, it is not considered that the hip to gable roof extensions would appear overbearing or result in loss of light to any neighbour. A window is proposed within each of the gable ends at first floor level. Given the siting of these windows, a condition would be attached to any granted consent to require these windows to be obscurely glazed and top level opening to prevent unacceptable overlooking from occurring.
- 7.2.4 The proposed front dormer would serve a staircase and would be sited centrally within the front roofslope, and given the scale and siting of this element, facing the street, it would not result in any harm to neighbouring properties.
- 7.2.5 The proposed rear dormer would be contained within the rear roofslope of the dwelling, and would not extend beyond the existing rear elevation of the host dwelling, or neighbouring properties. Therefore, given the siting and scale of the proposed rear dormer, it is not considered that this element would result in any harm to neighbouring amenity.
- 7.2.6 In terms of overlooking, the rear dormer would contain French doors with a Juliet balcony and a window. The French doors would be sited to the western side of the rear dormer, set in 9.9m from the flank boundary with No. 12, and would therefore not result in overlooking to No. 12. This opening would face the rear garden of the application site and the neighbouring property at No. 10 and would be set a minimum of 6.4m from the boundary with No. 10 opposite the window. Whilst this distance is noted, the proposed French doors would not directly face the rear elevation or private amenity space adjacent to the rear elevation of the neighbour at No. 10, and would face towards the rear of neighbouring site. Therefore, it is not considered that the proposed French doors would result in unacceptable overlooking to No.10.
- 7.2.7 The proposed window in the rear dormer structure would be angled away from the neighbour to the east (No. 10) and would face down the garden of the application site. This arrangement has been design as a result of the proximity to the boundary and the orientation of the application plot relative to this neighbour. Given the positioning of the window, it is not considered that this window would result in unacceptable overlooking.

7.2.8 In summary, subject to conditions, the development is considered acceptable in terms of its impact on neighbouring residential amenity in accordance with Policy CP12 of the Core Strategy and Policy DM1 and Appendix 2 of the DMP LDD.

7.3 Amenity Space Provision

7.3.1 Policy CP12 of the Core Strategy states that development should take into account the need for adequate levels and disposition of amenity and garden space. Section 3 (Amenity Space) of Appendix 2 of the Development Management Policies document provides indicative levels of amenity/garden space provision.

7.3.2 The proposed extension would increase the number of bedrooms within the dwelling from two to four, thus there would be a requirement for the dwelling to retain at least 105sqm of amenity space. The application site would retain at least 315sqm of amenity space which would be ample to serve the application dwelling.

7.4 Wildlife and Biodiversity

7.4.1 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.

7.4.2 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.

7.4.3 The application has been submitted with a Biodiversity Checklist which states that no protected species or biodiversity interests will be affected as a result of the application. The Local Planning Authority is not aware of any records of protected species within the immediate area that would necessitate further surveying work being undertaken.

7.5 Trees and Landscaping

7.5.1 Policy DM6 of the DMP LDD sets out that development proposals should seek to retain trees and other landscape and nature conservation features, and that proposals should demonstrate that trees will be safeguarded and managed during and after development in accordance with the relevant British Standards.

7.5.2 The site is not within a conservation area and does not contain any protected trees. No trees of public amenity value would be harmed or removed by virtue of the proposal and the development is considered acceptable in this regard.

7.6 Highways, Access and Parking

7.6.1 Policy DM13 of the DMP LDD requires development to make provision for parking in accordance with the parking standards set out at Appendix 5 of the same document. The existing dwelling has 2 bedrooms and there is space for 2 cars to park on hardstanding to the frontage.

7.6.2 The proposed development would not alter the existing parking provision serving the host dwelling, however the proposal would facilitate the creation of two additional bedrooms, making the host dwelling a four bedroom dwelling. Appendix 5 of the Development Management Policies document outlines that a four or more bedroom dwelling should provide onsite parking provision for three vehicles.

- 7.6.3 The existing hardstanding to the application frontage can accommodate two vehicles, and there is sufficient space within the application site frontage to create an additional parking space if this is required in the future. It is noted that there is an existing garage, however the garage has an internal width of 2.5m, thus is not considered of a sufficient size to accommodate a vehicle. Therefore, whilst it is acknowledged that the proposal would result in an onsite shortfall of one parking space, it is not considered given the potential for additional spaces to be provided on site and the presence of existing parking controls in this cul-de-sac that the proposed development would result in demonstrable harm to highway safety so as to justify the refusal of planning permission in this regard.

8 Recommendation

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

- C1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

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: TRDC 001 (Location Plan), TRDC 002 (Block Plan), 1 Rev B, 2 Rev D, 3, 4 Rev C, 5 and 6 Rev D.

Reason: For the avoidance of doubt and in the proper interests of planning in accordance with Policies CP1, CP9, CP10 and CP12 of the Core Strategy (adopted October 2011), Policies DM1, DM6 and DM13 and Appendices 2 and 5 of the Development Management Policies LDD (adopted July 2013) and the Chorleywood Neighbourhood Plan (Referendum Version, August 2020).

- C3 Before the first occupation of the building/extension hereby permitted the windows at first floor level in the flank elevations shall be fitted with purpose made obscured glazing and shall be top level opening only at 1.7m above the floor level of the room in which the window is installed. The windows shall be permanently retained in that condition thereafter.

Reason: To safeguard the amenities of the occupiers of neighbouring residential properties 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).

- C4 Unless specified on the approved plans, all new works or making good to the retained fabric shall be finished to match in size, colour, texture and profile those of the existing building.

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).

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. Fees are £116 per request (or £34 where the related permission is for extending or altering a dwellinghouse or other development in the curtilage of a dwellinghouse). Please note that requests made without the appropriate fee will be returned unanswered.

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. If your development is CIL liable, even if you have been granted exemption from the levy, please be advised that before commencement of any works it is a requirement under Regulation 67 of The Community Infrastructure Levy Regulations 2010 (As Amended) that CIL form 6 (Commencement Notice) must be completed, returned and acknowledged by Three Rivers District Council before building works start. Failure to do so will mean you lose the right to payment by instalments (where applicable), and a surcharge will be imposed. However, please note that a Commencement Notice is not required for residential extensions IF relief has been granted.

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 applicant is hereby advised to remove all site notices on or near the site that were displayed pursuant to the application.
- 14 Bats are protected under domestic and European legislation where, in summary, it is an offence to deliberately capture, injure or kill a bat, intentionally or recklessly disturb a bat in a roost or deliberately disturb a bat in a way that would impair its ability to survive, breed or rear young, hibernate or migrate, or significantly affect its local distribution or abundance; damage or destroy a bat roost; possess or advertise/sell/exchange a bat; and intentionally or recklessly obstruct access to a bat roost.

If bats are found all works must stop immediately and advice sought as to how to proceed from either of the following organisations:

The UK Bat Helpline: 0845 1300 228
Natural England: 0300 060 3900
Herts & Middlesex Bat Group: www.hmbg.org.uk

or an appropriately qualified and experienced ecologist.

(As an alternative to proceeding with caution, the applicant may wish to commission an ecological consultant before works start to determine whether or not bats are present).

- 15 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 Local Planning Authority suggested modifications to the development during the course of the application and the applicant and/or their agent submitted amendments which result in a form of development that maintains/improves the economic, social and environmental conditions of the District.