

PART A	
Report of: Head of Development Management	
Date of committee:	13th June 2018
Site address:	149a, 149b and land to the rear of 149 St Albans Road
Reference Number:	18/00542/FULM
Description of Development:	Redevelopment of the site to provide a mixed use scheme comprising of 146 residential units (Class C3), flexible commercial units (Classes A1/A2/B1/D1/D2) and associated cycle parking, car parking, play space, landscaping and associated works.
Applicant:	Watford Development Limited
Date Received:	9th May 2018
13 week date (major):	8th August 2018
Ward:	Callowland

1.0 Site and surroundings

- 1.1 The application site occupies approximately half of a triangular plot of land, the borders of which are the West Coast Mainline railway (which lies in a cutting), Bedford Street and the St Albans Road. Currently this area is dominated by vehicles: being occupied by several businesses that sell used cars, or that repair and service cars, or that hire vans.
- 1.2 The applicants have purchased several plots of land to make up the application site, including the yard behind 149 St Albans Road, but not including the building at 149 itself, which is a tyre fitting garage called Tyre City. The application site does not include any of Network Rail's land, which covers approximately half of the triangle: this includes operational land for track access and storage and the site of the former Railway Social Club (now demolished).
- 1.3 Unlike the previous application under ref. 17/01413/FULM, the site does not include the listed former station building at 147a, St Albans Road, which was granted listed building consent under ref. 17/01414/LBC. This building remains within the applicant's ownership and remains part of the overall development

scheme, but is not part of the current application. A separate planning application has been submitted for the change of use of the building (ref. 18/00586/FUL).

- 1.4 The site is part of the *Watford Junction Special Policy Area* (SPA2) although it is separated from the main part of the SPA by the St Albans Road. This site is also part of the Nascot Conservation Area; albeit it is separated from most of the conservation area by the mainline railway. The Conservation Area's northern edge is the houses and back gardens of Bedford Street, and it also includes The Prince George pub, Dunnings Bar, and the former Leavesden Road bus station which has recently been redeveloped as flats.

2.0 Proposed development

- 2.1 To demolish all of the existing buildings on the site and to redevelop the site for a residential led, mixed-use development comprising 146 dwellings and 346m² of flexible commercial floorspace (Classes A1/A2/B1/D1/D2). The development includes 4 distinct buildings varying in height from 3 to 11 storeys. The residential dwellings include 62 x 1 bed units, 68 x 2 bed units and 16 x 3 bed units with a 22% provision of affordable housing units (25% of habitable rooms).
- 2.2 The application is a revised development scheme for the site following the refusal of planning permission for a previous scheme under ref. 17/01413/FULM (see below). The sole reason for refusal related to the height of Block B fronting St Albans Road, which was proposed at 13 storeys. The current proposal retains the same site layout, access arrangements, building footprints, design and materials as the refused scheme but has incorporated various amendments in order to address the sole reason for refusal.
- 2.3 The main changes that have been incorporated into the current scheme are as follows:
- Reduction in the tower element of Block B facing St Albans Road from 13 storeys to 9 storeys.
 - Addition of 1 storey to lower part of Block A (maximum height unchanged).
 - Addition of 1 storey to lower part of Block D (maximum height unchanged).
 - Removal of basement from Block B.
 - Reduction in number of dwellings from 150 to 146.
 - Reduction in number of parking spaces on site by 12.
 - Change to the affordable housing provision (see Section 6.5).
- 2.4 In summary, the massing of the scheme has been redistributed. The comparison of the main changes to the proposed buildings compared to the previous scheme is

summarised in the table below:

	17/01413/FULM	18/00542/FULM
Block	Storey heights	Storey heights
A (adj. railway line)	7-11	8-11
B (fronting St Albans Rd)	6-13	6-9
C (centre of site)	7	7
D (fronting Bedford St)	2-4	3-4

2.5 The housing mix has changed as follows:

	17/01413/FULM	18/00542/FULM
Unit size		
1 bedroom	57	62
2 bedroom	75	68
3 bedroom	18	16
Total	150	146

2.6 The scheme now includes 16 car parking spaces which includes 10 spaces allocated for car club vehicles only.

3.0 Relevant planning history

3.1 The following planning history is relevant to this application:

17/01413/FULM - Redevelopment of the site to provide a mixed use scheme comprising 150 residential units (Class C3), flexible commercial units (Classes A1/A2/A3/B1 and D2) and use of the Old Station building as an artisan beer tap room and/or community space (Classes A4/D1/D2/B2), alterations to the listed building, associated cycle parking, car parking, play space and landscaping and associated works. The application was recommended for approval by officers but was refused planning permission at the committee meeting on 31st January 2018 for the following reason:

The height, bulk and design of the tall buildings in the development fail to conserve or enhance the character and appearance of the Nascot conservation area, and will have an unacceptably harmful effect on the surrounding area. As such, it is contrary to saved Policies U18 and U19 of the Watford District Plan 2000, and Policies SS1, UD1 and UD2 of the Watford Local Plan Core Strategy 2006-2031, and requirements in the National

Planning Policy Framework for good design.

17/01414/LBC - Alterations to the Old Station building associated with its conversion to an artisan tap-room and/or community space. Listed building consent granted 31st January 2018.

4.0 Planning policies

Development plan

4.1 In accordance with s.38 of the Planning and Compulsory Purchase Act 2004, the Development Plan for Watford comprises:

- (a) *Watford Local Plan Core Strategy 2006-31;*
- (b) *the continuing “saved” policies of the Watford District Plan 2000;*
- (c) *the Hertfordshire Waste Core Strategy and Development Management Policies Document 2011-2026; and*
- (d) *the Hertfordshire Minerals Local Plan Review 2002-2016.*

4.2 Supplementary Planning Documents

The following Supplementary Planning Documents are relevant to the determination of this application, and must be taken into account as a material planning consideration.

Residential Design Guide
Watford Character of Area Study
Nascot Conservation Area Appraisal

5.0 Consultations

5.1 Neighbour consultations

Letters were sent to 124 properties in the surrounding area and all those who commented on the previous application. At the time of preparing this report, 13 representations have been received with 10 in support, 6 objections (1 from the Nascot Residents Association) and 2 neutral comments. The objections raised by local residents are as follows:

Points Raised	Officer's Response
Because only 22 parking spaces are proposed for 146 dwellings, insufficient off-street parking is proposed, and it is feared that the	The aim of the development is to be essentially car free with car clubs providing vehicles for the use of residents. The site is in a sustainable

other residents will have to park on neighbouring streets, exacerbating problems of parking congestion there.	location with good access to public transport, local facilities and the town centre. Furthermore, consultations will be undertaken in surrounding areas to the north in respect of new controlled parking zones (see Section 6.7 of the report).
Impact of additional traffic on Bedford Street and other roads.	The site will be accessed directly from St Albans road and will not utilise Bedford Street, other than to service the 10 dwellings in Block D. The essentially car free nature of the development will minimize the number of traffic movements generated.
The buildings will not be in keeping with the character of the Nascot Conservation Area because of their height and appearance. Out of place and will tower over existing properties.	The site is also within the Watford Junction Special Policy area which promotes higher density redevelopment of the poor quality, underused site. The proposal has been assessed with regard to its potential impact on the Nascot Conservation Area (see Section 6.3 of the report).
Does Watford have the infrastructure in place to support these new units?	Due to its essentially car free nature, the proposal will have an overall net reduction in peak time traffic generation. Health and school facilities are the responsibility of other providers although in this case the site is exempt from CIL contributions.
Impacts from construction, especially noise. Impacts on shallow foundations of existing properties.	These are not a material planning considerations but are covered under environmental protection legislation and the Building Regulations.
Insufficient affordable housing provision.	See Section 6.5 of the report.
Potential impacts on the railway line – access and land slippage.	Access to the railway lines will be maintained through the site, as existing. The applicant will need to liaise directly with Network Rail regarding works adjoining the railway line.

5.2 The comments from the Nascot Residents Association are as follows:

“The new application (18/00542/FULM) shows very few changes from the previous application refused by the Council in January 2018. These changes do not get to the heart of our objections and, we suggest, are still far short of the Council’s own planning policies and aspirations.

“Our objections, in brief, are:

- The major physical change from the earlier submission is a further reduction of two storeys (to 9 storeys) to the block nearest the St Albans Road. However this has been achieved by increasing the heights of two other blocks (one overlooking Bedford Street which comprises two storey houses) Thus, there are now 11, 9 and 7 storey blocks in an area of two-storey, mainly residential buildings.
- The applicants dishonestly claim that there are fewer units (at 146) - yet the application refused in January had 144 units. Questions therefore arise about the accuracy of other claims in the application.
- The Council’s own adopted “Taller Buildings” policy sets out the very reasonable case that *“clusters of tall buildings primarily focused around Watford Junction station”* should step down *“to create a smooth transition with the surrounding context”*. These multi-storey blocks are not a smooth transition!
- We are very concerned that the proposed development sets a very dangerous precedent for future developments in and around the Nascot Conservation Area.
- The design of the development is still inadequate – displaying, on the St Albans Road frontage, an incongruous tower block alongside a single-storey tyre-fitting dealer. Hardly a good advertisement for the town for those entering by road or rail and certainly inappropriate in a conservation area.
- With 32 “affordable” units proposed, this is still well below the Council’s own policy requirement of 35% affordable units.
- Although the NRA is fully supportive of the redevelopment of Bedford Street triangle, this proposal is clearly a piecemeal development which precludes any chance of the Tyre City site ever being developed, resulting in a most unsatisfactory development.

“The Nascot Residents Association’s recommendation is that this application should also be refused for the reasons cited above. Again, we suggest that the Committee resolve to ask the relevant portfolio holder to investigate the use of CPO powers to avoid the piecemeal redevelopment of the area; and to offer a partnership to the

current applicant to progress this to achieve a high-density but low-rise residential development of which the community, the Council and, yes, the developer can be proud.”

- 5.3 The letters of support are in favour of the application for the following reasons: support bringing Pope’s Yard Brewery to Watford, sympathetic rejuvenation of the area, well considered plans, need for extra housing and benefit of affordable housing.
- 5.4 Supporting comments from 8 nearby businesses have also been forwarded by the applicant. Five are standard letters stating they support the application. The other 3 are in the form of a short petition stating “The proposal will regenerate this run-down site, deliver much needed housing and improve the vision of St Albans Road, creating an active frontage and improved public realm.”
- 5.5 The previous application under ref. 17/01413/FULM received 86 representations in support, 3 objections and 1 neutral comment.
- 5.6 **Statutory publicity**
Two site notices were placed outside the site on 11th May 2018. A public notice was also published in the Watford Observer on 18th May 2018. The overall expiry date for these notices is 8th June 2018.
- 5.7 **Technical consultations**
The same technical consultees were consulted as for application ref. 17/01413/FULM. As the only material changes are to the heights of the buildings and the mix of units, the previous responses (excluding those specific to the listed building) can be taken as material considerations in this case.
- 5.7.1 Housing Team
“We have compared the affordable housing proposed to what policy requires and have looked at both number of units (table 1) and the habitable room (table 2). Neither meets policy requirements of 35%.

Table 1 Units

Units	Social Rented	Affordable Rented	LCHO	Private Rented	Total
1 bed	0	4	1	56	61
2 bed	3	12	3	51	69
3 bed	3	6	0	7	16
Total proposed	6	22	4	114	146

Units required to be policy compliant	10	33	8
Difference in scheme and policy requirements	-4	-11	-4

Table 2 Habitable Rooms

Habitable rooms	Social Rented	Affordable Rented	LCHO	Private Rented	Total
1 bed	0	8	2	112	122
2 bed	9	36	9	153	207
3 bed	12	24	0	28	64
Total	21	68	11	293	393
Habitable room required to be policy compliant	28.0	89.0	21.0		
Difference in scheme and policy requirements	-7.0	-21.0	-10.0		

“From 146 units, 51 units should be affordable housing, whereas the application has 32, so 19 units below policy and only 22% of the site.

“From 393 habitable rooms, 138 habitable rooms should be affordable housing, whereas the application has 100, so 38 below policy and only 25% of the site.

“We appreciate that there is an ongoing viability appraisal being completed, after which, if the Council are in agreement that there are viability issues preventing the provision of a policy compliant affordable housing mix (33 x Affordable rented, 10 x social rented 8 x LCHO), we would prefer any reduction in units to come from the LCHO units. We need to maintain as many affordable housing rented units as viable, especially the 2 and 3 bedroom units.” *[The viability appraisal has been completed and is discussed in paragraph 6.5.2]*

5.7.2 Environmental Health

Raised no objections subject to appropriate conditions to address issues of potential noise and fumes to the flats from the railway line, proposed beer tap room and Dunnings Bar on St Albans Road.

5.7.3 Contaminated Land Officer

No objection subject to appropriate conditions to deal with land contamination.

5.7.4 Hertfordshire County Council (Highways Authority)

No objection subject to requested conditions and a s.106 planning obligation to secure payments towards the monitoring of a Travel Plan for the development and local highways improvements.

5.7.5 Hertfordshire County Council (Lead Local Flood Authority)

No objection subject to appropriate conditions.

5.7.6 Hertfordshire County Council (Fire and Rescue Service)

Has requested fire hydrants be secured to serve the development.

5.7.7 Thames Water

No objections with regard to surface water or foul water network infrastructure capacity.

6.0 Appraisal

6.1 Main issues

The main issues to be considered in the determination of this application are:

- (a) Principle of uses.
- (b) Scale, design and impact on heritage assets.
- (c) Quality of residential accommodation.
- (d) Housing mix and affordable housing provision.
- (e) Impact on surrounding properties.
- (f) Transport and parking.
- (g) Development potential for adjoining land.

- 6.1.1 Application ref. 17/01413/FULM was the subject of 2 very detailed reports to the Committee on 3rd January and 31st January 2018 (The full agenda and minutes are respectively available at <http://watford.moderngov.co.uk/ieListDocuments.aspx?CId=292&MId=1933&Ver=4> and <http://watford.moderngov.co.uk/ieListDocuments.aspx?CId=292&MId=1934&Ver=4>). Given that the application was refused for a single reason and that decision is a significant material consideration, it is not proposed to reiterate the detailed discussion of the application in this case but to focus primarily on the changes made to the application in order to address the reason for refusal.

6.2 (a) Principle of uses

The site is located within Special Policy Area 2: Watford Junction in the Core Strategy where mixed-use redevelopment is promoted. This includes a significant amount of housing (1,500 units or more) at high density comprising tall buildings of various scales. Although the application site is at the western end of the SPA, separated from the main site by St Albans Road, it is nevertheless identified for residential development. The current site comprises various poor quality, low level commercial buildings in vehicle related uses that do not exploit the potential of the site. It is a typical brownfield site suitable for redevelopment with significant regeneration potential.

6.2.1 There is no objection in principle to the loss of the existing commercial uses or to the redevelopment of the site with high density housing. This is in accordance with Policy SPA2 and the merging masterplan for the development of the land surrounding Watford Junction. In considering the previous application under ref. 17/01413/FULM, the Committee raised no objections to the principle of the residential led, mixed-use development proposed or to the overall scale of buildings. The only concern related to the height of Block B on the St Albans Road frontage (see paragraph 6.3 below).

6.2.2 The overall mix of uses and scale of development is very similar to that previously proposed and remains acceptable, subject to the consideration of the amendments made to overcome the previous reason for refusal.

6.3 (b) Scale, design and impact on heritage assets

The site falls within the Nascot Conservation Area, the main part of which lies to the south and is separated from the site by the railway cutting; but the Conservation Area also includes Bedford Street with its single side of terraced two storey Victorian houses and extends to Leavesden Road and Copsewood Road to the north. In the main part of the conservation area bricks are the predominant material, and most of the buildings are two, three or four storeys tall. Within the conservation area, the whole site and adjoining land in the ownership of Network Rail is identified as having a neutral impact. This appears to be a somewhat generous assessment given that the recently built terrace of houses at the end of Bedford Street are considered to be harmful, despite their design and materials reflecting the terraced housing in Bedford Street. It would not be unreasonable to consider the condition of the buildings and open land on the application site, and their uses, to be harmful to the overall character and appearance of the conservation area given it is characterised by largely Victorian, suburban housing.

6.3.1 In addition to being within the conservation area, the site and adjoining land also falls within the Watford Junction Special Policy Area and is identified for residential

development (up to 6 storeys) within the Watford Junction draft development brief. Although not adopted, the draft development brief recognises the opportunity the site presents for regeneration and identifies the site for higher density residential development. It is a brownfield site of poor quality buildings and open land in a highly sustainable location. As such, national planning policy encourages the efficient and effective use of such land to meet current housing needs. Furthermore, the site fronts on to St Albans Road, a busy main distributor road leading to the town centre and Watford Junction station.

- 6.3.2 The current scheme (and previous scheme) seeks to address these differing designations and the context of the site in a way that will maximise the use of the land (and the provision of housing) whilst preserving or enhancing the character and appearance of the conservation area. Clearly blocks of flats that are up to 11 storeys high do not resemble Victorian houses that are typical of the conservation area but the aim is not to reproduce or to pastiche historic buildings, but rather to produce new buildings that acknowledge heritage assets, and which do not detract from them.
- 6.3.3 In considering the previous application, notwithstanding the reason for refusal, the committee was supportive of the overall approach to the development of this site, to provide high density housing as part of the wider redevelopment of the land around Watford Junction. The current application retains this approach which involves staggering the heights of the buildings so that they step down where they approach sensitive neighbours, such as the listed building or the houses on Bedford Street; by creating clear breaks between the buildings and the introduction of soft landscaping within the site; and the use of facing bricks as the main finishing material, proposing subdued tones of brown or grey that respect their Victorian surroundings.
- 6.3.4 In this immediate context, the proposed buildings varying in height from 3 to 11 storeys across the site is considered an appropriate and reasonable response to the constraints and opportunities afforded by the site. Within the wider context, buildings of a similar scale have been granted along St Albans Road to the south of the site. A building up to 14 storeys has been approved on the site of Clarendon House, Bridle Path, opposite the site to the south-east (ref. 16/01245/FULM); a building up to 8 storeys was granted on appeal at Caledonian House, St Albans Road (at the junction with West Street) (ref. 15/01532/FULM), backing on to the Nascot Conservation Area; and opposite this latter site, at 16-18, St Albans Road, two buildings of 8 and 10 storeys have been approved (ref. 17/01367/FULM).
- 6.3.5 The current application has reduced the height of the tallest building, Block B fronting St Albans Road, from 13 to 9 storeys compared to the previous scheme,

with the tallest building at 11 storeys, being Block A to the rear of the site adjoining the railway line. These buildings are now directly comparable in height to those referenced above. The tallest elements of these buildings are set furthest away from individual heritage assets, namely the listed Old Station building and the locally listed buildings on St Albans Road and Bedford Street. Whilst any new development will have some visual impact on the setting of these buildings, overall it is not considered that their setting, within a dense urban environment and adjoining a brownfield site identified for higher density development, would be caused any significant harm.

- 6.3.6 In terms of the wider conservation area, the vast majority of the area lies to the south beyond the railway lines. The Victorian suburban form is largely intact and illustrates the gradual development of the town around the original railway station (now the Old Station building). This is an important part of its significance. The application site does not have this character or appearance despite adjoining the Old Station building. Historically, this land has been more directly associated with the railway and its associated industrial uses. In this respect, the development of the application site will not result in the loss of any features or buildings that contribute to the significance of the conservation area.
- 6.3.7 A visual townscape assessment submitted with the application shows that views of the proposed buildings will be very limited from the conservation area, even from Church Road, the closest road to the west of the site. Whilst it will be clearly visible from the rear of properties in Church Road and from Bedford Street, it is not considered that the proposal would cause any significant harm to the overall character and appearance of the conservation area. Given the degraded nature of the existing site and the high quality of the design and materials proposed, it is considered the proposal will provide an enhancement to this part of the conservation area.
- 6.3.8 The NPPF gives guidance on the assessment of harm to heritage assets. The proposal could not give rise to any substantial harm as there is no loss of buildings or features of heritage value and the area is, at best, of neutral impact. Where a proposal would give rise to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal. Although the scale of the proposed buildings up to 11 storeys is significantly different to the existing buildings and the conservation area as a whole, and may be considered to give rise to less than substantial harm, this harm needs to be weighed against the significant benefits the scheme delivers. In this case, it is considered that any less than substantial harm to the conservation area is outweighed by the benefits of regenerating this degraded site and delivering significant numbers of market and affordable housing in this sustainable location.

6.3.9 The listed former Station building is not part of this application but sits adjacent to Block B. The lower, 6 storey element of Block B remains unchanged from the previous application and the relationship between the two buildings and the impact of Block B on the setting of the listed building also remains unchanged. This is acceptable.

6.4 (c) Quality of residential accommodation

All of the proposed dwellings will meet or exceed the nationally described space standard as before. Many of the flats will be dual aspect and all will have good levels of natural light, outlook and privacy given the high density, urban nature of the development. All upper floor flats will have access to private balconies and all residents will have access to the communal, landscaped areas of open space.

6.4.1 A noise assessment has been submitted with the application which assesses the potential noise impacts on the proposed residential units from both the railway line and St Albans Road (road traffic). This identifies the need for noise mitigation measures, including enhanced double glazing and mechanical ventilation, on the different facades of the proposed buildings to ensure acceptable internal noise levels are achieved to the units. These mitigation measures can be secured by condition.

6.5 (d) Housing mix and affordable housing provision

The housing mix has changed slightly but still comprises a good mix of 1, 2 and 3 bed dwellings with the majority (84 units, 58%) being larger 2 and 3 bed units. This remains an acceptable mix of units for this sustainable location and will make a significant contribution to the housing needs of the borough.

6.5.1 Despite the loss of 4 units from the scheme, the number and percentage of affordable units has increased slightly from the previous scheme. However, the option of an additional commuted payment of £383,000, or the provision of 14 additional units for shared ownership, is no longer proposed. The previously proposed and current provisions are detailed below:

	17/01413/FULM	18/00542/FULM
Tenure	No. of units	No. of units
Social rent		
1 bedroom	0	0
2 bedroom	0	3
3 bedroom	5	3
Total	5	6

Affordable Rent		
1 bedroom	4	4
2 bedroom	11	12
3 bedroom	2	6
Total	17	22
Shared Ownership		
1 bedroom	5	1
2 bedroom	3	3
3 bedroom	0	0
Total	8	4
Overall Total	30	32
Overall %	20%	22%
Commuted sum	£383,000	£0

6.5.2 The current proposed provision of 22% affordable housing by units equates to 25% provision by habitable rooms as the applicant has sought to provide larger units as requested by the Housing team.

6.5.3 As with the previous scheme, this level of affordable provision has been informed by a viability appraisal submitted by the applicant. This appraisal has been reviewed by GL Hearn on behalf of the Council which included a detailed cost analysis. Their conclusions are as follows:

“Adopting the above assumptions for the revised scheme comprising 32 on-site affordable units, DS2 arrive at a scheme profit margin of 16.60% compared to the blended benchmark profit target of 18.55% based on the agreed profit margins above. This demonstrates a scheme deficit of -1.95% but despite the projected deficit, DS2 has stated that the Applicant is willing to proceed on this basis.

“As we have stated above the revised scheme is largely based on a number of previously agreed assumptions and with the exception of the build cost estimate we do not take issue with the revised scheme assumptions.

“As per our original analysis, we have run a new appraisal based on the Johnson Associates build cost estimate which arrives at a blended projected profit margin of 16.95% which compared to the agreed profit benchmark this still demonstrates a scheme deficit of -1.62%.

“Therefore, having considered the revised scheme and improved affordable housing provision we consider the current provision represents the maximum

level which can viably be supported by the scheme.”

6.5.4 This level of affordable housing provision proposed, which is below the 35% sought by Policy HS3 of the Core Strategy, is therefore considered to be justified in this case.

6.5.5 The applicant has also offered an alternative affordable housing option; a policy compliant affordable housing provision of 35% by units (51 units) through an amended tenure mix. This comprises the following:

	Social Rent	Affordable Rent	Shared Ownership
1 bedroom	0	4	17
2 bedroom	2	11	8
3 bedroom	0	6	3
Totals	2	21	28

6.5.6 This alternative provision is not supported by officers as it reduces the number of social and affordable rented units which are the most urgently required tenures to meet housing need.

6.6 (e) Impact on surrounding properties

The relationship of the proposed buildings on the site to surrounding properties remains unchanged. The 2 changes that are relevant relate to the increase in height of Block A (alongside the railway line) and Block D (fronting Bedford Street).

6.6.1 Block A

This block comprises 2 elements, originally of 7 storeys and 11 storeys. The nearest properties are in Church Road, on the opposite side of the railway lines, with Block A sited 45m from the rear windows of these properties. The proposed amended block includes an additional storey on the 7 storey element, increasing this to 8 storeys. Given the distance between this block and the properties in Church Road, and the fact that the 11 storey element also faces these properties, it is not considered that the proposed 8 storey element will have any greater impact on these properties.

6.6.2 Block D

This block faces 3 properties on the opposite side of Bedford Street. This was originally proposed as 2 storey houses (with a flat roof) facing the existing 2 storey houses across the road, with a 4 storey element adjoining the rear of the Tyre City building. The site of Block D has an existing extant permission for a 2 storey block of flats, designed to have the appearance of a terrace of houses, with a pitched roof. The proposed 3 storey block will not be any higher than the approved building and

is not considered to have any significant adverse impact on the existing properties.

6.7 (f) Transport and parking

The site is in a sustainable location, within walking distance of Watford Junction station, North Watford Shopping Centre and the town centre. Reduced parking provision is therefore acceptable in principle. The previous scheme provided 26 car parking spaces, including 10 spaces for car club vehicles. Under the current proposal, this provision has been reduced to 16 spaces with 10 of these still proposed for car club vehicles. Of the remaining spaces, 2 are allocated for people with disabilities and 6 allocated as private parking spaces for the future residents. The development will, therefore, effectively be car-free. The removal of the basement area to Block B and the reduction in parking spaces has been made to maintain the viability of the scheme and maximise the delivery of affordable housing.

6.7.1 This approach is considered acceptable in this sustainable location close to public transport, local facilities and the town centre. The submitted transport assessment has demonstrated that the vehicle trips generated by the proposed development will result in an overall net reduction compared to the existing site.

6.7.2 As with the previous application, the applicant has agreed to a series of transport and parking related measures to minimise travel and parking impacts and to promote sustainable modes of travel:

- To secure an agreement with a car-club operator to provide a car club operating on the site for at least three years from the first occupation of the development. The agreement is to include free car club membership for 3 years for residents of the development and a £50 drive credit for each resident.
- A financial contribution of £2,000 towards the amendment of local Traffic Regulation Order in the streets to the south of the site, and also in Bedford Street, to exclude the residents of the development from entitlement to residents' permits to park in those Controlled Parking Zones.
- A financial contribution of £45,000 towards 2 public consultations (one to be held during construction of the development and the other to be held after occupation of the development) into a proposal to introduce a new Controlled Parking Zone to the north of the site, and, in the event that the public response is favourable, towards the implementation of such a Controlled Parking Zone. In the event that the public responses are both negative the developer will be entitled to a 10% rebate.
- A financial contribution of £10,000 towards the installation of modern LED lighting in the nearby pedestrian underpass beneath St Albans Road, linking

to Watford Junction station, to improve public safety and amenity.

- A financial contribution of £6,000 to Hertfordshire County Council's for the monitoring of the proposed Travel Plan.

6.7.3 The proposal will also include 176 secure cycle spaces with 162 secure, long-term spaces for the use of residents and 14 short-term spaces at ground level for the use of visitors.

6.7.4 As with the previous scheme, servicing will take place from within the development with no servicing taking place directly on St Albans Road. This is acceptable and provides a highway benefit.

6.8 (g) Development potential for adjoining land

The developers have assembled the application site by purchasing several plots of land, but they have not been able to buy 149 St Albans Road (Tyre City) or any of Network Rail's land. However, they have indicated how further buildings could be added in future if any of that land were to become available, and this is shown in section 6.3 of the Design and Access Statement. As such, the proposals would not prevent these adjoining parcels of land from coming forward for development in the future.

7.0 Conclusion

7.1 The proposed scheme is considered to overcome the previous reason for refusal and deliver the regeneration benefits sought by its designation as part of a Special Policy Area. The significant planning benefits of the scheme are considered to outweigh any harm to the Nascot Conservation Area, which is considered less than substantial, and to offer an overall enhancement to the appearance of the site and the character and appearance of the wider conservation area. For these reasons the application is recommended for approval.

8.0 Human Rights implications

8.1 The Local Planning Authority is justified in interfering with the applicant's human rights in order to alleviate any adverse effect on adjoining properties and their occupiers and on general public amenity. With regard to any infringement of third party human rights, these are not considered to be of such a nature and degree as to override the human rights of the applicant and therefore warrant refusal of planning permission.

9.0 Recommendation

That, pursuant to a planning obligation under section 106 of the Town and Country Planning Act 1990 having been completed to secure the following Heads of Terms, planning permission be granted, subject to the conditions listed below:

Section 106 Heads of Terms

- i) To secure the affordable housing units in Building C comprising 6 units for social rent (3 x 2 bed and 3 x 3 bed), 22 units for affordable rent (4 x 1 bed, 12 x 2 bed and 6 x 3 bed) and 4 units for intermediate tenures (1 x 1 bed and 3 x 2 bed).
- ii) To secure an agreement with a car-club operator to provide car clubs operating on the site for at least three years from the first occupation of the development. The agreement is to include free car club membership for 3 years for residents of the development and a £50 drive credit for each resident.
- iii) A financial contribution of £2,000 towards the amendment of the local Traffic Regulation Order in the streets to the south of the site, and also in Bedford Street, to exclude the residents of the development from entitlement to residents' permits to park in those Controlled Parking Zones.
- iv) A financial contribution of £45,000 towards 2 public consultations (one to be held during construction of the development and the other to be held after occupation of the development) into a proposal to introduce a new Controlled Parking Zone to the north of the site; and, in the event that the public response is favourable, towards the implementation of such a Controlled Parking Zone. In the event that the public responses are both negative the developer will be entitled to a 10% rebate.
- v) The provision of such fire hydrants as may be required by Hertfordshire Fire and Rescue Service to serve the proposed development.
- vi) A financial contribution towards the planting of street trees outside the site on St Albans Road, subject to the agreement of Hertfordshire County Council (the Highway Authority) and subject to the locations not conflicting with immovable subterranean services. The contribution to be £1,000 per tree, up to a maximum of £4,000 in total.

- vii) A financial contribution of £10,000 towards the installation of LED lighting in the neighbouring public pedestrian underpass beneath St Albans Road, to improve public safety and amenity.
- viii) A financial contribution of £6,000 to Hertfordshire County Council for monitoring of the Travel Plan for the site.

Conditions

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

Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development shall be carried out in accordance with the following drawings, unless otherwise approved in writing by the Local Planning Authority:

Drawing L/S/001/71757/PGA01 by BBUK
Drawing L/S/002/71757/PGA02 by BBUK
Drawing L/S/003/71757/PH03 by BBUK
Drawing L/S/004/71757/PH04 by BBUK
Drawing L/S/005/71757/PP05 by BBUK
Drawing L/S/006/71757/PP06 by BBUK
Drawing L/S/007/71757/PTR07 by BBUK
Drawing L/DE/401/71757/D01 by BBUK
Landscape Statement L/RPT/71757/LS by BBUK
Drawing 1624-LS-S-XX-DR-A-000 by Lynas Smith
Drawing 1624-LS-S-XX-DR-A-001 by Lynas Smith
Drawing 1624-LS-S-LG-DR-A-1100 by Lynas Smith
Drawing 1624-LS-S-00-DR-A-1100-P2 by Lynas Smith
Drawing 1624-LS-S-05-DR-A-1100 by Lynas Smith
Drawing 1624-LS-S-10-DR-A-1100 by Lynas Smith
Drawing 1624-LS-S-20-DR-A-1100 by Lynas Smith
Drawing 1624-LS-S-30-DR-A-1100 by Lynas Smith
Drawing 1624-LS-S-40-DR-A-1100 by Lynas Smith
Drawing 1624-LS-S-50-DR-A-1100 by Lynas Smith
Drawing 1624-LS-S-60-DR-A-1100 by Lynas Smith
Drawing 1624-LS-S-70-DR-A-1100 by Lynas Smith
Drawing 1624-LS-S-80-DR-A-1100 by Lynas Smith

Drawing 1624-LS-S-90-DR-A-1100 by Lynas Smith
Drawing 1624-LS-S-100-DR-A-1100 by Lynas Smith
Drawing 1624-LS-S-RP-DR-A-1100 by Lynas Smith
Drawing 1624-LS-S-XX-DR-A-1200 by Lynas Smith
Drawing 1624-LS-S-XX-DR-A-1201 by Lynas Smith
Drawing 1624-LS-S-XX-DR-A-1202 by Lynas Smith
Drawing 1624-LS-S-XX-DR-A-1300 by Lynas Smith
Drawing 1624-LS-S-XX-DR-A-1301 by Lynas Smith
Drawing 1624-LS-S-XX-DR-A-1302 by Lynas Smith
Drawing 1624-LS-A-XX-DR-A-1500-P2 by Lynas Smith
Drawing 1624-LS-A-XX-DR-A-1501-P2 by Lynas Smith
Drawing 1624-LS-A-XX-DR-A-1502 by Lynas Smith
Drawing 1624-LS-A-XX-DR-A-1503 by Lynas Smith
Drawing 1624-LS-A-XX-DR-A-1504 by Lynas Smith
Drawing 1624-LS-A-XX-DR-A-1505 by Lynas Smith
Drawing 1624-LS-A-XX-DR-A-1506 by Lynas Smith
Drawing 1624-LS-B-XX-DR-A-1500-P2 by Lynas Smith
Drawing 1624-LS-B-XX-DR-A-1501-P2 by Lynas Smith
Drawing 1624-LS-B-XX-DR-A-1502 by Lynas Smith
Drawing 1624-LS-B-XX-DR-A-1503 by Lynas Smith
Drawing 1624-LS-B-XX-DR-A-1504 by Lynas Smith
Drawing 1624-LS-C-XX-DR-A-1500 by Lynas Smith
Drawing 1624-LS-C-XX-DR-A-1501 by Lynas Smith
Drawing 1624-LS-C-XX-DR-A-1502 by Lynas Smith
Drawing 1624-LS-D-XX-DR-A-1500 by Lynas Smith
Drawing 1624-LS-D-XX-DR-A-1501 by Lynas Smith
Drawing 1624-LS-A-XX-DR-A-1800 by Lynas Smith
Drawing 1624-LS-A-XX-DR-A-1801 by Lynas Smith
Drawing 1624-LS-A-XX-DR-A-1802 by Lynas Smith
Drawing 1624-LS-B-XX-DR-A-1800 by Lynas Smith
Drawing 1624-LS-B-XX-DR-A-1801 by Lynas Smith
Drawing 1624-LS-B-XX-DR-A-1802 by Lynas Smith
Drawing 1624-LS-B-XX-DR-A-1803 by Lynas Smith
Drawing 1624-LS-C-XX-DR-A-1800 by Lynas Smith
Drawing 1624-LS-C-XX-DR-A-1801 by Lynas Smith
Drawing 1624-LS-D-XX-DR-A-1800 by Lynas Smith
Schedule 1624-LS-S-XX-SH-A-501 by Lynas Smith
Schedule 1624-LS-S-XX-SH-A-504 by Lynas Smith
Schedule 1624-LS-S-XX-SH-A-505 by Lynas Smith
Schedule 1624-LS-S-XX-SH-A-506 by Lynas Smith

Reason: For the avoidance of doubt and in the interests of proper planning.

3. No development shall commence (unless such other date or stage in development as may be agreed in writing with the Local Planning Authority), until the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:
- i) A preliminary risk assessment which has identified:
 - all previous uses
 - potential contaminants associated with those uses
 - a conceptual model of the site indicating sources, pathways and receptors
 - potentially unacceptable risks arising from contamination at the site.
 - ii) A site investigation scheme, based on (i) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site. This should include an assessment of the potential risks to: human health, property (existing or proposed) including buildings and service lines and pipes, adjoining land, ground waters and surface waters, and ecological systems.
 - iii) The site investigation results and the detailed risk assessment (ii) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
 - iv) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (iii) are complete and identifying any requirements for longer term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local Planning Authority. The scheme shall be implemented as approved.

The above must be undertaken in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

4. No construction works shall commence until a verification report demonstrating completion of the works set out in the approved remediation strategy (see Condition 3 above) and the effectiveness of the remediation has been submitted to and approved, in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason: This is a pre-commencement condition to verify that all contamination has been successfully removed from site following all remediation works in the interests of the health of the future occupiers of the site, in accordance with Policy SE24 of the Watford District Plan 2000.

5. In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of Condition 5, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of Condition 5, which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing by the Local Planning Authority in accordance with Condition 5.
6. The development permitted by this planning permission shall be carried out in accordance with the approved Drainage Strategy and SuDS Statement (Job Number 2170485, Revision P4, dated 27/04/2018) prepared by Elliottwood, and the following mitigation measures detailed within the drainage strategy:
 - i) Providing attenuation to ensure no increase in surface water run off volumes for all rainfall events up to and including the 1 in 100 year + climate change event.
 - ii) Implementing appropriate drainage strategy based on attenuation and discharge into Thames Water surface water sewer including SuDS features as indicated on drawing No. 2170485-EW-00-L00-DR-C-1002 Rev.P3 – Proposed Below Ground Drainage Strategy – Northern Site, drawing No. 2170485-EW-00-L00-DR-C-1000 Rev.P5 – Proposed Below Ground Drainage Strategy – Main Site Sheet 1 of 2 and No. 2170485-EW-00-L00-DR-C-1001 Rev.P3 – Proposed Below Ground Drainage Strategy – Main Site Sheet 2 of 2.

- iii) Limiting surface water discharge off the site at a maximum allowable rate of 5.0 l/s for the 1 in 100 year plus 40% for climate change event.

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing/phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the Local Planning Authority.

Reason: To prevent flooding by ensuring the satisfactory disposal and storage of surface water from the site; and to reduce the risk of flooding to the proposed development and future occupants.

- 7. No development shall take place above the level of the damp-courses until the final design of the drainage scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include:
 - i) Detailed engineered drawings of the proposed SuDS features including their, size, volume, depth and any inlet and outlet features including any connecting pipe runs and all corresponding calculations/modelling.

Reason: To prevent an increased risk of flooding, both on and off the site.

- 8. No construction work shall take place above the level of the damp-course until full details of the bricks and window frames for the new buildings shall have been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that high quality materials are used, which are sympathetic to the character of the Nascot Conservation Area in which the site is located, pursuant to Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

- 9. No construction work shall take place above the level of the damp-course until a noise mitigation scheme for each of the residential dwellings, based upon the recommendations of the Noise Exposure Assessment (Report 12653-NEA-01 RevB dated 20 April 2018) by Clement Acoustics, has been submitted to and approved by the Local Planning Authority. The scheme shall include the details and specifications of the sound reduction performance of all glazed and non-glazed elements of the building facades, acoustic ventilators and mechanical ventilation systems. An updated noise assessment shall be submitted to demonstrate that the proposed measures achieve the required internal noise levels. No dwelling shall be occupied until

the approved mitigation measures have been installed in full, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure good indoor ambient noise levels are achieved in accordance with BS 8233:2014 for the future occupiers of the dwellings.

10. No occupation of any dwelling or commercial unit forming part of the development shall take place until the existing vehicular access on St Albans Road has been upgraded, and all other pedestrian accesses in to the development site have been provided, as indicated in principle on the approved drawings.

Reason: To ensure safe and convenient access into the site for vehicles, cyclists and pedestrians in the interests of public safety.

11. No part of the development shall be occupied until a detailed Travel Plan for the development, based upon the Hertfordshire County Council document 'Hertfordshire Green Travel Plan Guidance', has been submitted to and approved in writing by the Local Planning. The approved plan shall be implemented as approved at all times, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the development offers a wide range of travel choices to reduce the impact of travel and transport on the environment, in accordance with Policy T3 of the Watford Local Plan Core Strategy 2006-31.

12. The residential units shall not be occupied until the landscaping scheme, including the roof garden on Building B and the children's play-space with its equipment, has been installed, as shown on the plans that are hereby approved; unless otherwise approved in writing by the Local Planning Authority. Thereafter the landscaping and the children's play space shall be retained. Any trees or plants, whether new or existing, which within a period of five years die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, or in accordance with such other details as shall have been approved in writing by the Local Planning Authority.

Reason: In the interests of the visual amenity of the site, in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31, and to ensure that residents of the new dwellings will have the use of suitable space for outdoor recreation.

13. The development shall not be occupied until the proposed car parking spaces (including those which are to serve car club vehicles) and the bicycle storage spaces (sufficient for a minimum of 146 cycles) have been provided as shown on the approved drawings. The 4 surface level parking spaces and at least 6 of the basement car parking spaces shall be reserved specifically for electrically powered car club vehicles, and they shall be equipped with active charging posts. Of the approved car parking spaces, at least 2 shall be reserved for the vehicles of residents or staff of the development who are registered disabled. No parking spaces shall be installed other than those that are shown on the approved plans, unless approved in writing by the Local Planning Authority.

Reason: The development is essentially car-free and to ensure residents have access to environmentally friendly vehicles for personal use and to encourage cycling as a sustainable mode of travel. The provision of additional parking spaces is likely to compromise the quality of the open spaces within the development.

14. The development shall not be occupied until the refuse stores to serve the development have been provided as shown on the approved drawings.

Reason: To ensure that adequate facilities are provided for the hygienic storage of waste, and that no harm will be caused to the visual amenity of the site, pursuant to saved Policy SE7 of the Watford District Plan 2000 and Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

15. The development shall not be occupied until a dedicated office has been provided on the ground floor of Block B, as shown on the approved plans, or in such other location as has been agreed in writing by the Local Planning Authority, for a concierge service. No dwelling shall be occupied until the concierge service has been provided. The concierge service shall be retained thereafter, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the orderly management of the development, to deter and prevent antisocial behaviour, crime, noise nuisance, and inappropriate parking; for the proper storage and collection of refuse, receipt of deliveries on behalf of residents, and management of the two car clubs that are to be operated within the site.

16. No dwellings in Building D shall be occupied, and no dwellings on the ground floor, mezzanine or first floor of Building B shall be occupied, until full details

have been submitted to and approved in writing by the Local Planning Authority setting out how their amenity is to be protected from nuisances that might arise from noise and vibrations emanating from the Old Station building, from the ground floor commercial unit in Building B, and from the existing tyre fitting establishment at 149 St Albans Road; and also in the case of Building D how those dwellings will be protected from fumes or odours emanating from the neighbouring public house at 151 St Albans Road.

Reason: To safeguard the amenities and quiet enjoyment of neighbouring residential properties pursuant to saved Policies SE20 (Air Quality) and SE22 (Noise) of the Watford District Plan 2000.

17. No part of the development shall be occupied until a detailed Travel Plan for the development, based upon the Hertfordshire County Council document 'Hertfordshire Green Travel Plan Guidance', has been submitted to and approved in writing by the Local Planning. The approved plan shall be implemented as approved at all times, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the development offers a wide range of travel choices to reduce the impact of travel and transport on the environment, in accordance with Policy T3 of the Watford Local Plan Core Strategy 2006-31.

18. No dwelling shall be occupied until details of a communal terrestrial television aerial(s) and satellite dish(es) for each building have been submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of the character and appearance of the building, in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

19. For the avoidance of doubt, no communications development permitted by Class B or Class C of Part 16 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 shall be undertaken on the building.

Reason: In the interests of the character and appearance of the building, in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

20. The ground floor commercial unit shall only be used for purposes within Classes A1, A2, B1(a), D1 and D2 of the Town and Country Planning (Use Classes) Order 1987 (as amended) and for no other purposes, unless otherwise approved in writing by the Local Planning Authority.

Reason: In the interests of the functioning and appearance of the site and the amenities of residents within the development.

21. All plant and equipment shall only be sited within the designated plant rooms shown on the approved drawings. No plant or equipment shall be installed externally within the site or on the external facades of the buildings unless details have been submitted to and approved in writing by the Local Planning Authority. Details to be submitted for approval shall include siting, size, appearance and technical specifications relating to noise.

Reason: In the interests of the visual appearance of the site and the amenities of the residential occupiers, in accordance with Policy UD1 of the Watford Local Plan Core Strategy 2006-31.

Informatives

1. In dealing with this application, Watford Borough Council has considered the proposal in a positive and proactive manner having regard to the policies of the development plan as well as paragraphs 186 and 187 of the National Planning Policy Framework and other material considerations, and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015.
2. This permission does not remove the need to obtain any separate consent, which may be required under the Buildings Act 1984 or other building control legislation. Nor does it override any private rights which any person may have relating to the land affected by this decision. To find more information and for advice as to whether a Building Regulations application will be required please visit www.watfordbuildingcontrol.com.
3. This planning permission does not remove the need to obtain any separate consent of the owner of the adjoining property prior to commencing building works on, under, above or immediately adjacent to their property (e.g. foundations or guttering). The Party Wall Etc Act 1996 contains requirements to serve notice on adjoining owners of property under certain circumstances, and a procedure exists for resolving disputes. This is a matter of civil law between the two parties, and the Local Planning Authority are not involved in such matters. A free guide called "The Party Wall Etc Act 1996: Explanatory Booklet" is available on the website of the Department for Communities and Local Government at

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/393927/Party_Wall_etc__Act_1996_-_Explanatory_Booklet.pdf

4. You are advised of the need to comply with the provisions of The Control of Pollution Act 1974, The Health and Safety at Work Act 1974, The Clean Air Act 1993 and The Environmental Protection Act 1990. In order to minimise impact of noise, any works associated with the development which are audible at the site boundary should be restricted to the following hours: Monday to Friday 8am to 6pm, Saturdays 8am to 1pm. Noisy work is prohibited on Sundays and bank holidays. Instructions should be given to ensure that vehicles and plant entering and leaving the site comply with the stated hours of work. Further details for both the applicant and those potentially affected by construction noise can be found on the Council's website at:
https://www.watford.gov.uk/info/20010/your_environment/188/neighbour_complaints_%E2%80%93_construction_noise
5. This planning permission is accompanied by a planning obligation in the form of a Section 106 agreement, which is binding upon the owners and their successors in title.
6. The applicants are reminded that works affecting the public highway, including any alterations to the existing vehicular access to the site, will require a separate agreement with Hertfordshire County Council (the Highway Authority) under Section 278 of the Highways Act 1980.
7. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures
<https://developers.thameswater.co.uk/Developing-a-largesite/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB
8. The developer is advised to meet the standards of the Secured By Design scheme, which can reduce levels of burglary and other crime in new

developments. Further information is available from Hertfordshire Constabulary's Crime Prevention Design Service.

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