To: Town Hall, Watford WD17 3EX  
Email: developmentcontrol@watford.gov.uk (include home address)  
  
Dear Sir,   
  
Planning application: 17/00048/FULM  
We wish to make objections to the proposed high rise development to the east of Ascot Road, making reference to key Watford Borough Council planning documents.  
The height and massing of the development is on an unprecedented scale for Watford and its hinterland and will have a devasting effect on the surrounding area.  
Given the enormity of the application there is a wide range of Planning policy issues to consider. We have grouped objections under key topics. Pertinent Council Policy is contained primarily within 1) The Local Plan 2006 to 2031, 2) Local Plan part 2. (Currently under examination) which includes a chapter (11) on Tall Buildings and refers to 3) Skyline - Watford's Approach to Taller Buildings Supplementary Planning Document.   
  
Supply of dwellings in excess of Policy requirements  
The Local Plan part 2 hones in on a mixed development site, referenced MXD4, located at Ascot Road and allots a dwelling capacity of 400 units. Within the Local plan 2006 to 2031 Watford BC included Special Policy Areas, one of which was the Western Gateway (which includes the Ascot Road area) for which it originally planned for only 300 homes within the totality of the Western Gateway. Clearly the number of units contained within this application is 20% in excess of policy requirements.   
  
Inappropriate scale/design/street scene:  
The application comprises four blocks, ranging in height from 6 to 24 storeys. The Tower rises to 134.5 metres, which is the same height as the top of the London Eye for comparison. There will be a 25 storey tower with annex (6 storeys), Street Corner (7 storeys) , Townhouse (6 storeys), and Urban Apartment (9 storeys) presenting a close cluster of buildings with a mass and height unprecedented in Watford and on the periphery of its boundary line.

This scale and mass is starkly out of keeping and character with the local environment, which would i) tower over the whole locality and ii) present a massing of cramped high rise living space. Skyline policy states that poorly sited and badly considered elevated structures can have significant adverse impacts if poorly planned and designed. The Local Plan Pt2 (11) states: Height in relation to context - which considers that it is not just about the height of a building but the context in which the building sits. Croxley Green residents value their community assets and village atmosphere, which would be compromised and overshadowed by such City style architecture.

Watford’s Local Plan Core Strategy (2006-2031) states that any development should “knit well into the existing urban fabric” which this fails to do.

HS2 housing mix- “high density developments will be focused around the town centre and to a LIMITED extent around the proposed station at Ascot Road.” This is not a limited development and is unprecedented in the area and is comparative only to the London skyline.

Local Plan Part 2 – Site Allocations and Development Management Policies – “need to comply with TB1 and TB2 in the Taller building statement. TB1 (Location) says: “heights of up to 50 metres MAY be considered. Not all sites and proposals will be suitable for tall buildings development. This development therefore fails to comply with this requirement.   
  
Inappropriate design  
Policy TB2 (Design) states that it is vitally important that any applications which do not demonstrate in the Taller Building Approach document that the 8 (Policy TB2) Criteria have been met, will not be considered suitable.

Primary concerns are:  
Criterion 1: Skyline, views and townscape  
Appendix 1 of the Approach document states that Watford has a number of important views and landmark buildings that need consideration when proposals for taller buildings are submitted and that proposals will need to take account of the setting of historic buildings, landscapes and skylines to ensure that taller buildings are sensitively sited and appropriately designed resulting in a sympathetic integration with their immediate and nearby surroundings.

Strategic Viewpoint 10 - from Sandy Lodge , in relatively close proximity to the Moor Park Conservation Area in Three Rivers District. Hampermill Lake is located to the centre of the photograph with the lands surrounding it in a Greenbelt designation. Ths application conflicts with Development Management Strategy which states that individual taller buildings may result in a significant impact on the skyline. A 25 storey (135m high) development would dominate the skyline at this point.   
Strategic View 9 (is from Watford Road approaching Rickmansworth Road. However, its caption states that Ascot Road is not viewed here. This photograph deliberately excludes the view of Ascot Road, creating a blind spot by zooming in and concentrating its view on Watford Town Centre. However, the concentration of a mass of Tall Buildings with a maximum height of 135m would dominate this skyline. There is no Strategic View looking towards Watford from Baldwins Lane (the other major road route into Watford from the west). If there was then Such a development would be prominent on the skyline.   
  
Skyline para 7.3 states that:   
a) dramatic variations and fluctuations in height across an urban grain are not supported. The preferred approach involves localised clustering of taller buildings that do not negatively impact on any important views, vista or sky views. Clearly the Tower block and cluster of associated buildings would have significant negative impact on these important views.

7.4 states that clusters of taller buildings are desirable in the right places, mainly linked to public transport interchanges. At this time, there are no close public transport interchanges. The Met Line Extension has not been confirmed for completion so this policy point is not a factor in the development application.

In relation to points on conservation areas, Skyline highlights the importance of Cassiobury Park (also a registered park) and the Colne Valley as Conservation areas - important features of Watford’s urban profile and essential to positive perceptions of its townscape. Furthermore, the tower block would be visible from Croxley Common Moor, an SSSI as well as from numerous points of the Grand Union Canal. Views into and out of these areas will be severely impaired by this development. Additionally, it is possible that the tower block could be viewed from The Grove (historic building).

7.8 states that in moving forward with future development and redevelopment involving taller buildings, care will be needed to ensure that opportunities are taken to enhance the setting of an asset and minimise harm. Presumably, restricting taller buildings to a height of 8 storeys (approx. 35m) - the maximum height of the only other tall building in the vicinity will enhance the setting and minimise harm.  
  
Criterion 3. Buildings settings  
7.13 states that new tall buildings should contribute to the quality of the surrounding area and complement the pattern of the area. They should respond positively to surrounding building heights, depths, lines, street frontages, massing, characteristic alignments, setbacks of surrounding buildings, and provide an appropriate scale compatible with their surroundings. This development tower block and associated buildings of up to 83m would be more than 3 times the height of the next tallest building on the skyline, create a huge spike on the skyline and set a precedent for this low lying area to have additional high tower blocks built nearby. There cannot be a more detrimental contribution to the quality of the surrounding area if a development on this scale was to be approved.   
  
Amazingly, in 6.6.2 of its Design and Access statement the developer states that careful consideration has been given to ensure the visual effect of the scheme is minimalised through the use of appropriate building heights and massing - the maximum building height in relation to neighbouring buildings and its view from Cassiobury Park being key considerations. This statement requires detail and evidence of the nature of care considered as a tower that is over 3 times the height of buildings in the vicinity with associated tall building height and massing; in the centre of Watford or in any other part of Watford needs clear and transparent consideration.   
  
7.14 states that all new tall buildings should give consideration to how they sit within the existing urban rhythms, architectural language, and historic setting of the area. It is essential that they make a positive contribution to their surroundings through an appropriate form, setback, massing and responds to the prevailing urban pattern. Whilst the pattern in this area is regeneration the rhythms have been set with buildings generally up to a maximum of 4 storeys with one nearby, newer building up to around 8 storeys (up to 35m high). Clearly, a 25 storey development (up to 135m high) will not accord to 7.14.  
  
Infrastructure:  
Skyline 7.67 states that all new tall building proposals should assess the current capacity of local public/social infrastructure and facilities, and their ability to absorb the impacts related to increases in urban density brought about by tall buildings. Current is the key word here. There is no Met Line Extension. There is no new nearby secondary school.   
To reiterate a prior point, Skyline 7.4 states that clusters of taller buildings are desirable in the right places, mainly linked to public transport interchanges. At this time, there are no close public transport interchanges. The Met Line Extension has not been confirmed for completion so this policy point is not a factor in the development.

Planning policies (National Planning Policy Framework NPPF) states the need for local authorities to “deliver homes, business, industrial units and sufficient infrastructure…to meet local needs.” However a development such as this will result in further pressure on school places, surgeries and public utilities. The secondary school due to be built close by at the bottom of Baldwin’s Lane is six times over-subscribed, so there will be no space to take pupils from this new build and all the local schools are full. The two surgeries are at full capacity and patients already wait for appointments. The sales pamphlet includes Park End surgery as the local surgery, but this is already oversubscribed with local people from both West Watford and Croxley Green. These are serious concerns and such over-development will result in inadequate resources for community provision.   
  
Parking:  
7.67 requires that all new tall building proposals should assess the current capacity of local public/social infrastructure and facilities, and their ability to absorb the impacts related to increases in urban density brought about by tall buildings. One issue that stands out is the provision of only 185 car parking spaces for 485 dwellings as well as for retail units. Local Plan 10.7 Car Parking Strategy states at 10.7.1 that the Council will revise its strategy and restrict the amount of car parking which is part of new development. This is all very well but at 0.39 spaces per unit, 300 dwellings will have no allocated car parking under this application. Where will the vehicles go? This practical question has to be addressed. The site is not close to a railway station or Watford Town Centre and is situated at the edge of Watford. It is not practical to consider, particularly in view of the location of the site, that 70% of dwellings will not have a vehicle and that 30% will only have 1 vehicle each.

Additionally, Local Plan pt2 Policy T6 (Car Park Provision) states that where there are 4 or more dwellings, a 25% additional provision of unallocated visitor spaces will be required, based on the number of dwellings. This provision is not included in the application.   
The Local Plan – Part 2 states “Under provision of parking can exacerbate problems of dangerous or inappropriate parking that causes congestion and inconvenience on-site and in neighbouring streets. It can undermine the commercial effectiveness of a site. “(para 7.4)

Parking pressures already are problematic in this area and Three Rivers District Council (TRDC) are currently undertaking a survey to elicit resident’s views as to how best to manage these pressures on parking. If such an application was passed with so little provision for parking then a serious situation would arise and spill over of the parking to neighbouring areas, which already are struggling to cope.   
  
Cycle storage and cycling  
7.74 Requires that a proposal should have fully appraised the required infrastructure and utility capacity to meet the demands of the development. Applicants are required to submit a car and cycle parking strategy/approach showing how the development can accommodate demand and how any reduction in provision will impact on adjacent public car parks and cycle hubs. The logic of the application is entirely based on the premise that there is major transport infrastructure in place. It is not currently in place and is unlikely to be there for a few years to come. There are no cycle lanes from the site that lead to any part of Watford and there is no evidence of commitment to create the same.  
  
Summary  
The height and relative mass of the application clearly, greatly exceeds planning policy and guidance and whilst regeneration of the area is required I would expect the Planning Authority to reject the application in order that the developer can return with an application that accords with the requirements of the Local Plan and provides an apt and sustainable development that is sympathetic to its surroundings.

Yours faithfully,  
The Croxley Green Residents' Association  
  
Signed by:  
Barry Grant (Chairman)  
4th February 2017