

Appendix B: Summary of consultation responses and changes made to the document

A total of six responses were received. These consisted of 8 comments. In addition there were 6 “no comment” responses from Transport for London, Hertfordshire County Council, Network Rail, Historic England, Highways England and the Canal and River Trust which are not included in the following table.

A second table sets out officer changes made to the consultation document. These are in addition to changes made in response to submitted representations.

Reference	Respondent	Organisation	Summary of comments	Relevant paragraph in the amended document	Change
1	Lucy Bird	St Williams	Have an interest in brownfield site in SPA4, the former Gas Works site located on Lower High Street, to the south of Watford town centre & the opportunity to conserve and enhance listed Grade II building Frogmore house located there.	29-38	Text amended to clarify the need for viability appraisals and the information required.
			<p>Viability</p> <p>Recognise the need for transparency in the viability process but given the complex and sensitive nature of viability appraisals, it is important that viability is addressed at the right time, in a sensitive manner and flexibly to reflect the uniqueness of each development site.</p>		
2			Disclosure of viability - information and	Text box, p.9	Viability assessments would only be published when they form part of a planning application, not

		<p>assessment</p> <p>Notes that discussions will evolve over time during the pre-application stage of proposals given the nature, mix and scale of development therefore this will make proposals subject to change which may limit the extent to which viability can be discussed at pre-app stages.</p> <p>Also requests confidentiality in having to disclose commercially sensitive information publicly as not to compromise an applicant's commercial position.</p>		<p>during pre-application discussions. The Government's general approach is to increase transparency in the planning process. This clarification informs potential applicants the submitted information will be published. Much of the information is available publicly through other avenues such as build costs, land purchase costs etc. Where clearly justified, the viability appraisal can have parts that deemed commercially sensitive redacted.</p>
3		<p>Benchmark Land Value:</p> <p>Recognises the council's preference for EUV 'plus' premium approach when determining land value and asks that market evidence should be use to advise on the premium as recommended in NPPG.</p> <p>Suggests AUV approach should also be considered to take into account specific site considerations, constraints or any specific development/investment cost associated within the sites. Also to be compliant with NPPF and accompanying NPPG: NPPG (para 024) recognises that the alternative use value approach offers more incentive for land owner to sell and for land owner to seek the highest sale price.</p> <p>Take into account site specific considerations and constraints – gives example of the Gas Works sites which is unique in both use and</p>	56-62	<p>The SPD does indicate the EUV as an aspect to be considered "amongst others". In line with the NPPF site specific considerations such as the cost of remediation would be taken into account where relevant.</p>

			character.		
4			<p>Review Mechanism:</p> <p>Advanced stage review (60% of sales) should be exceptional rather than applied across the board.</p> <p>Single phased smaller schemes should be treated differently to larger multi-phased scheme.</p> <p>Is there evidence to justify the choice of a 60% figure</p> <p>Where growth assumptions are included in assessment it is not reasonable to include a review mechanism as this would effectively be double counting.</p>	N/A	The SPD refers to the review mechanism applying to particularly large schemes involving site wide infrastructure. It would not apply to smaller schemes. Paragraph requiring a viability reappraisal after 60% of a single phased development has been completed has been deleted.
5	Alex Macgregor Mason	Nascot Residents Association	<p>Support the objective of creating mixed and balanced communities” so that no area becomes a quarter or enclave of any one type of housing; defined by tenure or wealth.</p> <p>Notes that the mixture of the housing stock (particularly in the southern area of Nascot) is a key factor not only in maintaining the unique physical character of the area but helps to add considerably to the social character as well.</p> <p>Also recognise that there may well be circumstances when a consolidation of affordable houses has other and competing priorities, so there may be a case for exceptions in order to take account of key worker requirements (around hospitals, for instance).</p>	N/A	Comments noted – no change to document required.
6	Mary Forsyth		Supports the SPD overall and understands the pressures of council to provide more	N/A	Comments noted – no change to document required.

			affordable homes for people. Comments that irrespective of calculations in terms of revenue generated there will still be considerable constraints to deliver enough homes due to the scarcity of the land. Also notes issues with the limited scope the council has to make more effective use of existing housing stock.		
7	Stephanie Mizen (Jones Lang Lasalle) on behalf of:	Orion (Cassiobridge) Limited, Berkshore Limited, Addison Investment Properties Limited	Agree that the SHMA should be used to inform the overall housing mix. The SPD says the housing mix should remain in accordance with Core Strategy Policy HS3 - instead it should be negotiated on a site by site basis based on viability of the site and the level of identified need for such provision in the local market area.	43-49	The SPD says that the type of affordable housing will be considered on a site by site basis – in discussion with the Council’s Housing Strategy team. Additional paragraphs provided for clarity.
8			Viability Review mechanisms should only apply in special circumstances for major large scale phased developments. Agree that if it is found that a higher percentage of on-site affordable housing can viably be provided, this higher amount will only be applied to subsequent phases of the development and will not be applied retrospectively to those already completed. Agree the Council should accept a change in tenure for later phases to better meet local needs.	40-42	The SPD refers to the review mechanism applying to particularly large schemes involving site wide infrastructure. It would not apply to smaller schemes. Paragraph requiring reassessment when 60% of a single phase development has been removed.

Officer Changes			
Reference	Change	Reason for change	Relevant paragraph within amended document
OC1	Amend text on cover page.	Clarity.	Front cover.
OC2	Table of contents added.	Clarity.	Page 2
OC3	General formatting of text and tables.	Clarity and presentation.	General
OC4	General text amendments.	Clarity	General
OC5	Consultation and feedback section deleted.	N/A	Included as part of the consultation statement when adopted.
OC6	Amend text to set out how the document fits in with national planning guidance.	16	Clarity and context.
OC7	Provide text about eligibility for affordable housing.	18	Clarity and context.
OC8	Delete section titled 'Changes to definitions'.	N/A	Paragraph does not support the implementation of Policy HS3.
OC9	Add paragraph to require an applicant to state what they consider to be 'exceptional circumstances'.	26	Provide clarity to enable the planning officer to consider the reasons for altering the affordable housing requirement and if these are justified. Increases transparency.
OC10	Added text about pre-application advice.	27-28	Encourage early engagement with applicants to reduce the potential for future delays.
OC11	Amend text to provide more flexibility about the affordable housing requirement.	33	Circumstances are different for different sites and schemes and flexibility is needed to enable delivery.
OC12	Formula amended to use acronyms rather than being text based.	40-41	To simplify the equation.
OC13	Add text about how a commuted sum applies to a partial dwelling.	56	Reduce the potential for disagreements about how a partial dwelling (as calculated using the formula) would be provided for.

OC14	Amend the postcode areas used to calculate commuted sums. For simplicity, small areas along the periphery of the Borough have been included within the larger postcode area located adjacent.	Figure 1	Clarify commuted sum charging areas.
OC15	Tables and examples amended.	Appendix 1	Provide clarity about how the affordable housing requirement and commuted sums are calculated.
OC16	Amend and add definitions as appropriate.	Glossary	Text amended to clarify terminology.